

# Pali Commercial Company Limited

32, EZRA STREET, ROOM NO.-755, 7TH FLOOR, KOLKATA - 700 001,  
CIN : L51909WB1981PLC034414 E.mail : pali@khaitanwire.com  
Website : www.palicommercial.com

Date: 15<sup>th</sup> April, 2021

To,  
**The Calcutta Stock Exchange Limited,**  
7, Lyons Range,  
Kolkata- 700 001

Dear Sir/Madam,

**Sub: Regulation 31 of SEBI (LODR) Regulations, 2015: Shareholding Pattern for the Quarter ended 31<sup>st</sup> March, 2021**

Pursuant to Regulation 31 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find the enclosed herewith the Shareholding pattern of the Company for the Quarter ended 31st March, 2021.

Thanking You.

Yours faithfully,  
For **PALI COMMERCIAL CO LTD**

**PALI COMMERCIAL COMPANY LIMITED**

*Vinita Khaitan*  
Director

**Vinita Khaitan**  
**Managing Director**  
**DIN: 07168477**

Encl: As Above

**Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

1. Name of Listed Entity: **PALL COMMERCIAL CO LTD (CIN: L51909WB1981PLC034414)**

2. Scrip Code/Name of Scrip/Class of Security Equity:

3. Share Holding Pattern Filed under : Reg: 31(1)(a)/Reg: 31(1)(b)/Reg: 31(1)(c)  
a. If under 31(1)(a) then indicate the date of report one day prior to listing: NA  
b. If under 31(1)(b) then indicate the report for Quarter ending: **31st March, 2021**  
c. If under 31(1)(c) then indicate date of allotment/extinguishment: NA

4. Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:

| Particulars  | Yes* | No* |
|--|------|-----|
| 1 Whether the Listed Entity has issued any partly paid up shares?                        |      | No  |
| 2 Whether the Listed Entity has issued any Convertible Securities or Warrants?           |      | No  |
| 3 Whether the Listed Entity has any shares against which depository receipts are issued? |      | No  |
| 4 Whether the Listed Entity has any shares in Locked-in?                                 |      | No  |
| 5 Whether any shares held by promoters are pledge or otherwise encumbered?               |      | No  |

\* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

5. The tabular format for disclosure of holding of specified securities is as follows:

**PALL COMMERCIAL COMPANY LIMITED**

*Vidya Prashar*  
Director

PALI COMMERCIAL CO LTD

Table 1 - Summary Statement holding of specified securities as on 31.03.2021

| Category (I) | Category of shareholder (II)   | Nos. of shareholders (III) | No. of fully paid up equity shares held (IV) | No. of Partly paid up equity shares held (V) | No. of underlying Depository Receipts (VI) | Total no of shares held (VII)=(IV)+(V)+(VI) | Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2) | Number of Voting Rights held in each class of securities (X) |             |       | Total as a % of (A+B+C) | No of shares underlying convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of (A+B+C2) | Number of Locked in shares (XII) |                                 | Number of shares pledged or otherwise encumbered (XIII) |                                 | Number of equity shares held in dematerial form (XIV) |
|--------------|--------------------------------|----------------------------|--|--|--|---|---|--|-------------|-------|-------------------------|---|---|----------------------------------|---------------------------------|---|---------------------------------|---|
|              |                                |                            |  |  |  |   |   | Class eg: x  | Class eg: y | Total |                         |   |   | No. (a)                          | As a % of total shares held (b) | No. (a)   | As a % of total shares held (b) |   |
| (A)          | Promoter & Promoter group      | 2                          | 10010  | 0  | 0  | 10010                                       | 1.01%   | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |
| (B)          | Public                         | 28                         | 979990                                       | 0  | 0  | 979990                                      | 98.99%  | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |
| (C)          | Non Promoter - Non Public      | 0                          | 0  | 0  | 0  | 0   | 0%  | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |
| (C1)         | Shares underlying DRS          | 0                          | 0  | 0  | 0  | 0   | 0%  | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |
| (C2)         | Shares held by Employee Trusts | 0                          | 0  | 0  | 0  | 0   | 0%  | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |
|              | Total                          | 30                         | 990000                                       | 0  | 0  | 990000                                      | 100%  | 0  | 0           | 0     | 0                       | 0   | 0   | 0                                | 0                               | 0   | 0                               | 0   |

PALI COMMERCIAL COMPANY LIMITED

Vishal Kapoor  
Director



Table II - Statement Showing shareholding pattern of the Promoter and Promoter Group as on 31.03.2021

| (1) | Category & Name of the Shareholders (I) | PAN (II) | Nos. of shares held (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of shares underlying Depository Receipts (VI) | Total no of shares held (VII)=(IV)+(V)+(VI) | Shareholding % as per SCRR, 1957) As a % of (VIII) | Number of Voting Rights held in each class of securities (IX) |       | Total as a % of Total Voting rights | No of shares Underlying outstanding convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of (A+B+C2) | Number of Locked in shares (XII) | Number of shares pledged or otherwise encumbered (XIII) | Number of equity shares held in dematerialized form (XIV) |
|-----|---|----------|---------------------------|--|---------------------------------------|--|---|--|---|-------|-------------------------------------|---|---|----------------------------------|---|---|
|     |   |          |                           |  |                                       |  |   |  | No of Voting Rights Class Y                                   | Total |                                     |   |   |                                  |   |   |
| (1) | Indian                                  |          | 30                        | 990000                                       | 0                                     | 0  | 990000                                      | 100%   | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| (a) | Individuals/Hindu Undivided Family      |          |                           |  |                                       |  |   |  |   |       |                                     |   |   |                                  |   |   |
| 1   | Narendra Dev Narayan                    |          |                           | 10   | 0                                     | 0  | 10  | 0.00%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 2   | Pramod Kumar Saragol                    |          |                           | 10   | 0                                     | 0  | 10  | 0.00%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 3   | Deek Nandan Dhanuka                     |          |                           | 10   | 0                                     | 0  | 10  | 0.00%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 4   | Radhe Shyam Sinha                       |          |                           | 10   | 0                                     | 0  | 10  | 0.00%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 5   | Binod Kumar Jalan                       |          |                           | 10   | 0                                     | 0  | 10  | 0.00%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 6   | Shiv Kumar Dikwanla                     |          |                           | 20010  | 0                                     | 0  | 20010                                       | 2.02%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 7   | Suresh Kumar Dhanuka                    |          |                           | 10000  | 0                                     | 0  | 10000                                       | 1.01%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 8   | Shi Bam Bansari                         |          |                           | 46900  | 0                                     | 0  | 46900                                       | 4.74%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 9   | Ajit Kumar Khaitan                      |          |                           | 46200  | 0                                     | 0  | 46200                                       | 4.67%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 10  | Sunil Kumar Khaitan                     |          |                           | 44600  | 0                                     | 0  | 44600                                       | 4.51%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 11  | Kamala Devi Khaitan                     |          |                           | 46550  | 0                                     | 0  | 46550                                       | 4.70%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 12  | Bhairav Dutta Khaitan & Sons (HUF)      |          |                           | 46300  | 0                                     | 0  | 46300                                       | 4.68%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 13  | Anjana Khaitan                          |          |                           | 46350  | 0                                     | 0  | 46350                                       | 4.68%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 14  | Mrs. Udra Khaitan                       |          |                           | 46300  | 0                                     | 0  | 46300                                       | 4.68%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 15  | Pradeep Kumar Khaitan                   |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 16  | Chirag Khaitan                          |          |                           | 44280  | 0                                     | 0  | 44280                                       | 4.47%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 17  | Priyal Chowdhury                        |          |                           | 20000  | 0                                     | 0  | 20000                                       | 2.02%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 18  | Ashok Kumar Agarwal                     |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 19  | P. K. Khaitan & Sons(HUF)               |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 20  | Suresh Kumar Murarka                    |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 21  | Ankit Murarka                           |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 22  | S. K. Murarka & Sons                    |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 23  | Nidhi Murarka                           |          |                           | 35000  | 0                                     | 0  | 35000                                       | 3.54%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 24  | Nirunj Khaitan                          |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 25  | Sunil Kumar Khaitan & Sons              |          |                           | 40000  | 0                                     | 0  | 40000                                       | 4.04%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 26  | Nitesh Khaitan                          |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 27  | Shivani Murarka                         |          |                           | 45000  | 0                                     | 0  | 45000                                       | 4.55%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 28  | Sneha Khaitan                           |          |                           | 46600  | 0                                     | 0  | 46600                                       | 4.71%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 29  | Vinita Khaitan                          |          |                           | 46600  | 0                                     | 0  | 46600                                       | 4.71%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |
| 30  | Pallavi Khaitan                         |          |                           | 46600  | 0                                     | 0  | 46600                                       | 4.71%  | 0   | 0     | 0                                   | 0   | 0   | 0                                | 0   | 0   |

PALI COMMERCIAL COMPANY LIMITED

Vinita Khaitan

Director

Table II - Statement Showing shareholding pattern of the Promoter and Promoter Group as on 31.03.2021

| Category & Name of the Shareholders (I)                                | PAN (II) | Nos. of shares held (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of underlying Depository Receipts (VI) | Total no of shares held (VII)=(IV)+(V)+(VI) | Shareholding as per SCRR, 1957 as a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) |          |          | No of shares outstanding convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of A+B+C2 | Number of Locked in shares (XII) |                           | Number of shares pledged or otherwise encumbered (XIII) |          | Number of equity shares held in dematerialized form (XIV) |
|--|----------|---------------------------|--|---------------------------------------|---|---|--|---|----------|----------|--|---|----------------------------------|---------------------------|---|----------|---|
|  |          |                           |  |                                       |   |   |  | Class X   | Class Y  | Total    |  |   | (a) Total shares held (b)        | (a) Total shares held (b) |   |          |   |
| (b) Central Government/State Government(s)                             |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (c) Financial Institutions/Banks                                       |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (d) Any Other (Specify) Bodies Corporate                               |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| <b>Sub Total (A1)</b>  |          | <b>30</b>                 | <b>990000</b>                                | <b>0</b>                              | <b>0</b>                                    | <b>990000</b>                               | <b>100%</b>  | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0</b>   | <b>0</b>  | <b>0</b>                         | <b>0</b>                  | <b>0</b>  | <b>0</b> |   |
| (2) Foreign Individuals (Non-Resident Individuals/Foreign)             |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (b) Government   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (c) Institutions   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (d) Foreign Portfolio Investor   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| (e) Any Other (Specify)  |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0   | 0        | 0        | 0  | 0   | 0                                | 0                         | 0   | 0        |   |
| <b>Sub Total (A2)</b>  |          | <b>0</b>                  | <b>0</b>                                     | <b>0</b>                              | <b>0</b>                                    | <b>0</b>                                    | <b>0%</b>  | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0</b>   | <b>0</b>  | <b>0</b>                         | <b>0</b>                  | <b>0</b>  | <b>0</b> |   |
| <b>Total Shareholding of Promoter and Promoter Group (A)=(A1)+(A2)</b> |          | <b>30</b>                 | <b>990000</b>                                | <b>0</b>                              | <b>0</b>                                    | <b>990000</b>                               | <b>100%</b>  | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0</b>   | <b>0</b>  | <b>0</b>                         | <b>0</b>                  | <b>0</b>  | <b>0</b> |   |

PALI COMMERCIAL COMPANY LIMITED

*Vishva Prakash*

Director



Table III - Statement Showing shareholding pattern of the Promoter and Promoter Group as on 31.03.2021

| Category & Name of the Shareholders (I)                           | PAN (II) | Nos. of shares held (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of underlying Depository Receipts (VI) | Total no of shares held (VII)=(IV)+(V)+(VI) | Shareholding % calculated as per SCRR, 1957) As a % of (A+B+C2) (VIII) | Number of Voting securities (IX) |       | Total of Voting rights as a % of Total Voting rights | No of shares outstanding convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of (A+B+C2) | Number of Locked in shares (XII) |     | Number of shares pledged or otherwise encumbered (XIII) |     | Number of equity shares held in dematerialized form (XIV) |
|---|----------|---------------------------|--|---------------------------------------|---|---|--|----------------------------------|-------|--|--|---|----------------------------------|-----|---|-----|---|
|   |          |                           |  |                                       |   |   |  | Class                            | Total |  |  |   | (a)                              | (b) | (a)   | (b) |   |
| (1) Institutions  |          |                           |  |                                       |   |   |  |                                  |       |  |  |   |                                  |     |   |     |   |
| (a) Mutual Funds /UTI   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (b) Venture Capital Funds   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (c) Alternate Investment Funds                                    |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (d) Foreign Venture Capital Investors                             |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (e) Foreign Portfolio Investors                                   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (f) Financial Institutions / Banks                                |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (g) Insurance Companies   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (h) Provident Funds / Pension Funds                               |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (i) Any Other (Specify)   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| Sub Total   |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |
| (2) Central Government / State Government(s) / President of India |          | 0                         | 0  | 0                                     | 0   | 0   | 0%   | 0                                | 0     | 0  | 0  | 0   | 0                                | 0   | 0   | 0   | 0   |

PALI COMMERCIAL COMPANY LIMITED

Vineta Bhatnagar  
Director

Table III – Statement Showing Shareholding pattern of the Promoter and Promoter Group as on 31.03.2021

| (3) Non-Institutions | Category & Name of the Shareholders (I)  | PAN (II)    | Nos. of shareholders (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of shares underlying Depository Receipts (VI) | Total no. of shares held (VII)=(IV)+(V)+(VI) | Shareholding % calculated as per SCRR, 1957) As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) |              |                               | No of shares underlying convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of A+B+C2) | Number of Locked in shares (XII) | Number of shares pledged or encumbered otherwise (XIII) | Number of equity shares held in dematerialized form (XIV) |
|----------------------|--|-------------|----------------------------|--|---------------------------------------|--|--|--|---|--------------|-------------------------------|---|--|----------------------------------|---|---|
|                      |  |             |                            |  |                                       |  |  |  | Class   | No of Voting | Total of Voting rights as a % |   |  |                                  |   |   |
| (a)                  | Individuals-   |             |                            |  |                                       |  |  |  | x   | Y            | Total                         |   |  | (a)                              | (a)   | (a)   |
|                      | <b>I. Individual shareholders holding nominal share capital upto Rs.2 lakhs</b>          |             | <b>8</b>                   | <b>30060</b>                                 | <b>0</b>                              | <b>0</b>   | <b>30060</b>                                 | <b>3%</b>  | <b>0</b>  | <b>0</b>     | <b>0</b>                      | <b>0</b>  | <b>0</b>   | <b>0</b>                         | <b>0</b>  | <b>0</b>  |
|                      | 1 Narendra Dey Narayan   |             |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 2 Pramod Kumar Saragol   |             |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 3 Deeki Nandan Dhanuka   |             |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 4 Radhe Sivam Sinha  |             |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 5 Bindu Kumar Jalan  |             |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 6 Shiy Kumar Didwania  | AGRPD710AM  |                            | 10   | 0                                     | 0  | 10   | 0.00%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 7 Sita Ram Pansari   | AFSPPT64SD  |                            | 10000  | 0                                     | 0  | 10000  | 1.01%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 8 Ashok Kumar Agarwal  |             |                            | 20000  | 0                                     | 0  | 20000  | 2.02%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | <b>ii. Individual shareholders holding nominal share capital in excess of Rs.2 lakhs</b> |             | <b>22</b>                  | <b>959940</b>                                | <b>0</b>                              | <b>0</b>   | <b>959940</b>                                | <b>97%</b>   | <b>0</b>  | <b>0</b>     | <b>0</b>                      | <b>0</b>  | <b>0</b>   | <b>0</b>                         | <b>0</b>  | <b>0</b>  |
|                      | 1 Suresh Kumar Dhanuka   |             |                            | 20010  | 0                                     | 0  | 20010  | 2.02%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 2 AGDPK8955E   | AGDPK8955E  |                            | 46900  | 0                                     | 0  | 46900  | 4.74%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 3 Sunil Kumar Khaitan  | AEUPK3192H  |                            | 46200  | 0                                     | 0  | 46200  | 4.67%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 4 Kamala Devi Khaitan  | AFZPK5429F  |                            | 44600  | 0                                     | 0  | 44600  | 4.51%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 5 Bhairav Dutta Khaitan & Sons (HUF)   | AAACHB0892D |                            | 46550  | 0                                     | 0  | 46550  | 4.70%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 6 Anjana Khaitan   | AFQPK5101D  |                            | 46300  | 0                                     | 0  | 46300  | 4.68%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 7 Mrs. Udita Khaitan   | AFCHK2533F  |                            | 46350  | 0                                     | 0  | 46350  | 4.68%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 8 Pradeep Kumar Khaitan  | AERPK31086P |                            | 46300  | 0                                     | 0  | 46300  | 4.68%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 9 Chirag Khaitan   | ALYPK3681J  |                            | 45000  | 0                                     | 0  | 45000  | 4.55%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |
|                      | 10 Priyal Chowdhury  | AKKPK0356K  |                            | 44280  | 0                                     | 0  | 44280  | 4.47%  | 0   | 0            | 0                             | 0   | 0  | 0                                | 0   | 0   |

PAU COMMERCIAL COMPANY LIMITED

Vidita Khaitan  
Director

Table II - Statement Showing Shareholding pattern of the Promoter and Promoter Group as on 31.03.2021

| Category & Name of the Shareholders (I) | PAN (II)    | Nos. of shares held (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of underlying Depository Receipts (VI) | Total no of shares held (VII)=(IV)+(V)+(VI) | Shareholding % calculated as per SCRR, 1957) As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) |          | Total Voting rights as a % of Total Voting rights | No of shares outstanding convertible securities (including Warrants) (X) | Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=(VII)+(X) As a % of A+B+C2) | Number of Locked in shares (XII) | Number of shares pledged or encumbered otherwise (XIII) | Number of equity shares held in dematerialized form (XIV) |
|---|-------------|---------------------------|--|---------------------------------------|---|---|--|---|----------|---|--|--|----------------------------------|---|---|
|   |             |                           |  |                                       |   |   |  | Class X   | Class Y  |   |  |  |                                  |   |   |
| 11 P.K. Khaitan & Sons(HUF)             | AAQHP2099N  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 12 Suresh Kumar Murarka                 | AJEPN256AG  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 13 Ankit Murarka                        | ALVPM4770E  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 14 S.K. Murarka & Sons                  | AAAMH54624I |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 15 Nidhi Murarka                        | ALNPM1313L  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 16 Nikunj Khaitan                       | BFXK81726   |                           | 35000  | 0                                     | 0   | 35000                                       | 3.54%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 17 Sunil Kumar Khaitan & Sons           | AAALH52378L |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 18 Nitesh Khaitan                       | CYLPK0909A  |                           | 40000  | 0                                     | 0   | 40000                                       | 4.04%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 19 Shivani Murarka                      | BOKPM8782A  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 20 Sneha Khaitan                        | AFKPA5954I  |                           | 45000  | 0                                     | 0   | 45000                                       | 4.55%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 21 Vinika Khaitan                       | AFCCK4758C  |                           | 46600  | 0                                     | 0   | 46600                                       | 4.71%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| 22 Pallavi Khaitan                      | AXOPD9891K  |                           | 45850  | 0                                     | 0   | 45850                                       | 4.63%  | 0   | 0        | 0   | 0  | 0  | 0                                | 0   | 0   |
| <b>Sub Total</b>                        |             |                           | <b>990000</b>                                | <b>0</b>                              | <b>0</b>                                    | <b>990000</b>                               | <b>100%</b>  | <b>0</b>  | <b>0</b> | <b>0</b>  | <b>0</b>   | <b>0</b>   | <b>0</b>                         | <b>0</b>  | <b>0</b>  |
| <b>Total Public Shareholding</b>        |             |                           | <b>990000</b>                                | <b>0</b>                              | <b>0</b>                                    | <b>990000</b>                               | <b>100%</b>  | <b>0</b>  | <b>0</b> | <b>0</b>  | <b>0</b>   | <b>0</b>   | <b>0</b>                         | <b>0</b>  | <b>0</b>  |
| <b>(B)=(B)(1)+(B)(2)+(B)(3)</b>         |             |                           |  |                                       |   |   |  |   |          |   |  |  |                                  |   |   |

PALI COMMERCIAL COMPANY LIMITED

Vinika Khaitan  
Director



Table IV - Statement Showing shareholding pattern of the Non Promoter - Non Public shareholder as on 31.03.2021

| (1) Category & Name of the Shareholders (I)                              | (II) PAN | (III) No of shareholders | (IV) No. of fully paid up equity shares held | (V) Partly paid-up equity shares held (V) | (VI) Nos. of shares underlying Depository Receipts (VI) | (VII)=(IV) + (V)+(VI) | (VIII) Total no of shares held (VII)=(IV) + (V)+(VI) | (IX) % calculated as per SCRR, 1957) As a % of (A+B+C2) | (X) Number of Voting Rights held in each class of securities |          |          | (XI) Total of Voting rights as a % of Total | (XII) No of underlying convertible securities (including Warrants) (X) | (XIII) Total Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (X1)=(VII)+(X) As a % of A+B+C2) | (XIV) Number of Locked in shares (XII) |                                 | (XV) Number of pledged or otherwise encumbered shares (XIII) |                                 | (XVI) Number of equity shares held in dematerialized form (XIV) |
|--|----------|--------------------------|--|---|---|-----------------------|--|---|--|----------|----------|---|--|---|--|---------------------------------|--|---------------------------------|---|
|  |          |                          |  |   |   |                       |  |   | Class  | Total    | Total    |   |  |   | No. (a)                                | As a % of total shares held (b) | No. (a)  | As a % of total shares held (b) |   |
| (1) Custodian / DR Holder  |          | 0                        | 0  | 0   | 0   | 0                     | 0  | 0   | 0  | 0        | 0        | 0   | 0  | 0   | 0                                      | 0                               | 0  | 0                               | 0   |
| (2) Employee Benefit Trust (under SEBI (Share based Regulations, 2014)   |          | 0                        | 0  | 0   | 0   | 0                     | 0  | 0   | 0  | 0        | 0        | 0   | 0  | 0   | 0                                      | 0                               | 0  | 0                               | 0   |
| <b>Total Non Promoter- Non Public Shareholding</b><br><b>(C)=(1)+(2)</b> |          | <b>0</b>                 | <b>0</b>                                     | <b>0</b>                                  | <b>0</b>  | <b>0</b>              | <b>0</b>   | <b>0</b>  | <b>0</b>   | <b>0</b> | <b>0</b> | <b>0</b>                                    | <b>0</b>   | <b>0</b>  | <b>0</b>                               | <b>0</b>                        | <b>0</b>   | <b>0</b>                        | <b>0</b>  |

PALI COMMERCIAL COMPANY LIMITED

*Vidya Kulkarni*  
Director