



# ANUP MALLEABLES LIMITED

Works & Corporate : G.T. Road, Kandra, P.O. Bhitia, Govindpur, Dhanbad-828 109, Jharkhand (India)

Tel.: 91 - 6540 - 283002, 283176, Fax : 91-6540-283163

http://www.anupmalleables.com, E-mail : sales@anupmalleables.com



ISO : 9001 - 2000

## Directors' Report

To the Members,

Your Directors have pleasure in submitting their Annual Report of the Company together with the Audited Statements of Accounts for the year ended 31st March, 2016.

### 1. FINANCIAL SUMMARY

(Amount in `)

Particulars	As at the end of current reporting period	As at the end of previous reporting period
Total Revenue	26,80,88,322	17,92,52,079
Total Expenses	26,31,51,647	17,59,52,409
<b>Profit or Loss before Exceptional and Extraordinary items and Tax</b>	<b>49,36,675</b>	<b>32,99,670</b>
Less: Exceptional Items	--	--
Less: Extraordinary Items	--	--
<b>Profit or Loss before Tax</b>	<b>49,36,675</b>	<b>32,99,670</b>
Less: Current Tax	<b>9,40,683</b>	<b>6,28,752</b>
MAT Credit	<b>(9,40,683)</b>	<b>(6,28,752)</b>
Deferred Tax	14,54,304	(21,997)
<b>Profit or Loss After Tax</b>	<b>34,82,371</b>	<b>33,21,667</b>
Add: Balance as per last Balance Sheet	1,03,04,158	95,07,493
Less: Transfer to Reserves	--	--
Less: Adjustment relating to Fixed Assets	--	(25,25,002)
<b>Balance Transferred to Balance Sheet</b>	<b>1,37,86,530</b>	<b>1,03,04,158</b>

### 2. COMPANY'S OPERATIONAL PERFORMANCE

#### Total Revenue

Total income of the Company for the financial year 2015-16 comprises of Net Sales, work contract receipt and other income amounts to Rs. 2680.88 Lac which is increase of 49.56% over last year's figure.

#### Profit Before Tax

Profit before tax for the year under review is Rs.49.37 Lacs, an increase of 49.61% over the last year's figure.

#### Profit after Tax

Profit after tax for the year under review is profit of Rs. 34.82 Lacs, an increase of 4.84% over the last year's figure.

#### Earnings per Share

Earnings per share for the year under review are Rs 0.74 as compared to Rs. 1.27 for the last year.

#### Net worth

Net worth of the Company for the financial year 2015-16 is Rs 1701.77 Lac as against Rs. 416.94 Lac of the last year.

### 3. DIVIDEND

Your Directors do not recommend any dividend for the year because of requirement of funds for future expansion. No Dividend was declared for the current financial year.







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#### 4. TRANSFER TO GENERAL RESERVE

No amount was transferred to reserves during the financial year ended 31<sup>st</sup> March, 2016.

#### 5. CORPORATE GOVERNANCE

A Report on the compliance of Corporate Governance Code along with certificate from Secretarial Auditor thereon as stipulated under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015 is annexed to this Report.

#### 6. TRANSFER OF UNCLAIMED DIVIDEND TO INVESTOR EDUCATION AND PROTECTION FUND

The provisions of Section 125(2) of the Companies Act, 2013 do not apply as there was no dividend declared and paid last year.

#### 7. REVIEW OF BUSINESS OPERATIONS AND FUTURE PROSPECTS

Your Directors are optimistic about company's business and hopeful of better performance with increased revenue in next year. There was no change in the nature of business of company.

During the last Financial Year your Company had invested huge amount to procure automatic machines and lot of Jigs, Fixtures & Dies for development of extra large fabricated items such as Bogie Frame Assembly, Side Wall Assembly, Roof Assembly, Under frame Assembly etc. of different Diesel & Electric Locomotives and Coaches. Your company had assured to develop all the pending products by the end of the year 2016-2017 and we have great pleasure to inform you that sincere efforts of management and workers we achieve the target of 50 bogies manufacture per month till date and following products successfully developed till date –

1. Roof Asssly for WAG-9 locomotives
2. Central Sill WAG-9 locomotives
3. Central Under Frame WAG-9 locomotives
4. Bogie frame assembly for WAP-5 Locomotives
5. Started repairing works for VOLVO Korea

Currently company got development order of LHB Bogies Frame and Bolster asssembly. Company has enter into an long term agreemnt with Hazemag India Pvt. Ltd. to manufacture machines, to maintain its current dominance in the domestic market and to meet the future challenges, your Company is working on a long term strategic plan, which will steer the Company towards a target of manufacture 80 Bogies frame per month , thereby meeting the strategic objectives of achieving leadership in market.

#### 8. OPPORTUNITIES & THREATS

There is a huge demand for machined castings and fabricated items in Domestic as well as International Market. However, threats from small firms as well as Wagon manufacturers are still continuing. As their prices are very low, developed and established firms are not able to match their prices. In line with the aspirations of ongoing growth in the fiscal year 2015-16, company is integrating its resources and investing in new technologies to achieve greater performance and long term growth. Now Company got electrical power from DVC and to re-start its Foundry Division by end of this Financial Year. Once Steel Foundry Division gets started, your company is bound to take a quantum jump from its existing position.

#### 9. MATERIAL CHANGES AND COMMITMENT IF ANY AFFECTING THE FINANCIAL POSITION OF THE COMPANY OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR TO WHICH THIS FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT

No material changes and commitments affecting the financial position of the Company occurred between the end of the financial year to which this financial statements relate on the date of this report

#### 10. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO







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The provisions of Section 134(m) of the Companies Act, 2013 do not apply to our Company as far as Conservation of Energy or Technology Absorption are concerned.

## Foreign Exchange Outgo:

Nature of Expense	(Amount in `)	
	2015-16	2014-15
Purchase of Stores & Spares	1,00,420.00	4,93,181.00

## 11. STATEMENT CONCERNING DEVELOPMENT AND IMPLEMENTATION OF RISK MANAGEMENT POLICY OF THE COMPANY

The Company does not have any Risk Management Policy as the elements of risk threatening the Company's existence are very minimal.

## 12. DETAILS OF POLICY DEVELOPED AND IMPLEMENTED BY THE COMPANY ON ITS CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

The Company has not developed and implemented any Corporate Social Responsibility initiatives as the said provisions are not applicable

## 13. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS MADE UNDER SECTION 186 OF THE COMPANIES ACT, 2013

Details of loans, guarantee and investment covered under the provisions of 186 of the Companies Act, 2013 are given in the notes to Financial Statements.

## 14. PARTICULARS OF CONTRACTS OR ARRANGEMENTS MADE WITH RELATED PARTIES

All related party transactions that were entered into during the financial year ended 31st March, 2016 were on an arm's length basis and were in the ordinary course of business and that the provisions of section 188 of Companies Act, 2013 and rules made thereunder are not attracted. However, disclosure in Annexure I in form AOC-2 is enclosed. Further, there are no materially significant related party transactions made by the Company with Promoters Directors Key Managerial Personnel or other designated persons which may have a potential conflict with the interest of the Company at large.

All RPTs are placed before the Audit Committee for approval. Prior omnibus approval of Audit Committee is obtained on a yearly basis for the transactions which are of a foreseen and repetitive nature. The transactions entered into pursuant to the omnibus approval so granted are audited and a statement giving details of all related party transactions is placed before the Audit Committee and the Board of Directors for their approval.

None of the Directors has any pecuniary relationships or transactions vis--vis the Company..

## 15. EXPLANATION OR COMMENTS ON QUALIFICATIONS, RESERVATIONS OR ADVERSE REMARKS OR DISCLAIMERS MADE BY THE AUDITORS AND THE PRACTICING COMPANY SECRETARY IN THEIR REPORTS

There are no qualifications, reservations or adverse remarks made by the Auditors in their report.

## 16. COMPANY'S POLICY RELATING TO DIRECTORS APPOINTMENT, PAYMENT OF REMUNERATION AND DISCHARGE OF THEIR DUTIES

Your Company was in compliance of composition of Nomination and Remuneration Committee.







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## 17. PARTICULARS OF EMPLOYEES

There is no employee in the Company drawing monthly remuneration of Rs.500000/- per month or Rs.6000000/- per annum. Hence the Company is not required to disclose any information as per Rule 5(2) of The Companies (Appointment and Remuneration of Managerial Personnel) Rules 2014.

## 18. EXTRACT OF ANNUAL RETURN

The extracts of Annual Return pursuant to the provisions of Section 92 read with Rule 12 of the Companies (Management and Administration) Rules, 2014 is furnished in Annexure II and is attached to this Report.

## 19. NUMBER OF BOARD MEETINGS CONDUCTED DURING THE YEAR UNDER REVIEW

The Company has conducted 21 Board Meetings during the financial year under review. The intervening gap between any two meetings was within the period prescribe by Companies Act, 2013

## 20. DIRECTORS' RESPONSIBILITY STATEMENT:

In accordance with the provisions of Section 134(5) of the Companies Act, 2013 the Board hereby submits its responsibility Statement:

- in the preparation of the annual accounts, the applicable accounting standards have been followed along with proper explanation relating to material departures;
- the directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit and loss of the company for that period;
- the directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
- the directors have prepared the annual accounts on a going concern basis;
- the Company being unlisted, sub clause (e) of section 134(3) of the Companies Act, 2013 pertaining to laying down internal financial controls is not applicable to the Company; and
- the directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

## 21. SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES

The Company does not have any Subsidiary, Joint venture or Associate Company during the year under review.

## 22. DEPOSITS

The Company has neither accepted nor renewed any deposits during the year under review.

## 23. DIRECTORS AND KEY MANAGERIAL PERSONNEL

Pursuant to the Provisions of Section 149 of the Act, Mr. Amit Agarwal was appointed as Independent Director during the year and he has submitted a declaration that he meets the criteria of independence as provided in the Section 149(6) of the Act.

The Board of Director at its meeting held on 22.01.2016 appointed Mr. Navin Kumar Tulsyan (DIN: 00304819) as an Additional Director of the Company categorized as Independent Director for a period of five consecutive years, subject to the approval of the Members of the Company at the ensuing Annual General Meeting.







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Pursuant to the Provisions of Section 203 of the Act, Miss Poonam Khiria was appointed as the Company Secretary of the Company with effect from May 02, 2015.

## 24. DECLARATION OF INDEPENDENT DIRECTORS

Company received declaration from independent director under the provisions of Section 149 of Company Act 2013.

## 25. ADEQUACY OF INTERNAL FINANCIAL CONTROLS WITH REFERENCE TO FINANCIAL STATEMENTS

The company has adequate Internal Control System commensurate with the size and nature of the business. The system has been designed to ensure that, all assets are acquired economically, used efficiently and protected against loss, destruction or unauthorized use. All resources are used efficiently and effectively. Accounting, Financial and other operational information are accurate, reliable and provided timely and all applicable laws and internal policies are complied with true spirit.

## 26. STATUTORY AUDITOR

M/s Ashok Kedia & Company Chartered Accountants were appointed as Statutory Auditors for a period of 5 years in the Annual General Meeting held in the year 2015 and are eligible for reappointment, subject to ratification of members at ensuing Annual General Meeting of the company.

## 27. DISCLOSURE OF COMPOSITION OF AUDIT COMMITTEE AND PROVIDING VIGIL MECHANISM

The provisions of Section 177 of the Companies Act, 2013 read with Rule 6 and 7 of the Companies (Meetings of the Board and its Powers) Rules, 2013 regarding the Audit Committee and Vigil Mechanism are formed and works as per the provision of act.

## 28. AUDITORS' REPORT AND SECRETARIAL AUDITORS' REPORT

The auditors' report and secretarial auditors' report does not contain any qualifications, reservations or adverse remarks. Report of the secretarial auditor is given as an annexure which forms part of this report.

## 29. DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS, COURTS AND TRIBUNALS

No significant and material order has been passed by the regulators, courts, tribunals impacting the going concern status and Company's operations in future.

## 30. LISTING AGREEMENT

The Securities and Exchange Board of India (SEBI) on September 02, 2015 issued SEBI (Listing Obligation and Disclosure Requirements, 2015) with the aim to consolidate and streamline the provisions of Listing Agreements

## 31. LISTING WITH STOCK EXCHANGES

The Company confirms that it has paid the Annual Listing Fees for the year 2015-2016 to BSE and CSE where the Company's Shares are listed





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## 32. ACKNOWLEDGEMENT

Your Directors place on record their sincere thanks to bankers, business associates, consultants, and various Government Authorities for their continued support extended to your Companies activities during the year under review. Your Directors also acknowledges gratefully the shareholders for their support and confidence reposed on your Company.

For and on behalf of the Board of Directors

Ashok Khaitan  
Managing Director  
DIN: 00293871

Suyash Khaitan  
Director  
DIN: 03349969

Place: Kolkata  
Date: 30<sup>th</sup> May 2016



Annexure I: Particulars of contracts / arrangements made with related parties

Form No. AOC-2

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

This Form pertains to the disclosure of particulars of contracts / arrangements entered into by the Company with related parties referred to in Sub-section (1) of Section 188 of the Companies Act, 2013 including certain arm's length transaction under third proviso thereto.

Details of contracts or arrangements or transactions not at arm's length basis

There were no contracts or arrangements or transactions entered into during the year ended March 31, 2016, which were not at arm's length basis.

Details of material contracts or arrangement or transactions at arm's length basis

The details of material contracts or arrangement or transactions at arm's length basis for the year ended March 31, 2016 are as follows:

Name of Related Party	Nature of Relationship	Duration of Contract	Salient terms	Amount (Rs.)
<u>Sale</u>				
Hilltop Hirise Pvt Ltd	Associate	1 year	As per RPT Policy	1,92,957.00
Black Diamond Explosive (P) Ltd	Associate	1 year	As per RPT Policy	3,04,10,206.00
<u>Loan/Advances repaid</u>				
Ayush Agarwalla	KMP	1 year	As per RPT Policy	3,33,19,006.00
<u>Receipt toward loans and advances</u>				
Suyash Khaitan	KMP	1 year	As per RPT Policy	59,37,620.00
Ayush Agarwalla	KMP	1 year	As per RPT Policy	6,00,000.00

For and on behalf of the Board of Directors

  
Ashok Khaitan  
Managing Director  
DIN: 00293871

  
Suyash Khaitan  
Director  
DIN: 03349969



## FORM NO. MGT 9

## EXTRACT OF ANNUAL RETURN

As on financial year ended on 31.03.2016

Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management &amp; Administration) Rules, 2014.

I. REGISTRATION & OTHER DETAILS:		
1	CIN	L27310WB1981PLC033923
2	Registration Date	July 29, 1981
3	Name of the Company	ANUP MALLEABLES LTD
4	Category/Sub-category of the Company	Public Company Company Limited by Shares
5	Address of the Registered office	46B, Rafi Ahmed Kidwai Road, 2nd Floor, Kolkata-700016
6	Telephone No.	0326-2306851
	Whether listed company	Yes
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	M/s. Niche Technologies Pvt. Ltd. D-511, Bagree Market, 5 <sup>th</sup> Floor, 71, B.R.B. Basu Road Kolkata- 700001

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY			
(All the business activities contributing 10 % or more of the total turnover of the company shall be stated)			
S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacturing of locomotives	302	100

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES					
SN	Name and address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of shares held	Applicable Section
1	Nil	Nil	Nil	Nil	Nil

## IV. SHARE HOLDING PATTERN

(Equity share capital breakup as percentage of total equity)

## (i) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the beginning of the year [As on 31-March-2015]				No. of Shares held at the end of the year [As on 31-March-2016]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoters</b>									
(1) Indian									
a) Individual/ HUF	18,93,850	-	18,93,850	72.15%	30,62,008	-	30,62,008	45.08%	-27.06%
b) Central Govt			-	0.00%			-	0.00%	0.00%
c) State Govt(s)			-	0.00%			-	0.00%	0.00%
d) Bodies Corp.			-	0.00%	20,24,950		20,24,950	29.82%	29.82%
e) Banks / FI			-	0.00%			-	0.00%	0.00%
f) Any other			-	0.00%			-	0.00%	0.00%
<b>Sub Total (A) (1)</b>	<b>18,93,850</b>	<b>-</b>	<b>18,93,850</b>	<b>72.15%</b>	<b>50,86,958</b>	<b>-</b>	<b>50,86,958</b>	<b>74.90%</b>	<b>2.75%</b>
(2) Foreign									
a) NRI Individuals			-	0.00%			-	0.00%	0.00%
b) Other Individuals			-	0.00%			-	0.00%	0.00%
c) Bodies Corp.			-	0.00%			-	0.00%	0.00%
d) Any other			-	0.00%			-	0.00%	0.00%
<b>Sub Total (A) (2)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0.00%</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0.00%</b>	<b>0.00%</b>
<b>TOTAL (A)</b>	<b>18,93,850</b>	<b>-</b>	<b>18,93,850</b>	<b>72.15%</b>	<b>50,86,958</b>	<b>-</b>	<b>50,86,958</b>	<b>74.90%</b>	<b>2.75%</b>





<b>B. Public Shareholding</b>									
<b>1. Institutions</b>									
a) Mutual Funds		-	0.00%			-	0.00%	0.00%	
b) Banks / FI		-	0.00%			-	0.00%	0.00%	
c) Central Govt		-	0.00%			-	0.00%	0.00%	
d) State Govt(s)		-	0.00%			-	0.00%	0.00%	
e) Venture Capital Funds		-	0.00%			-	0.00%	0.00%	
f) Insurance Companies		-	0.00%			-	0.00%	0.00%	
g) FIs		-	0.00%			-	0.00%	0.00%	
h) Foreign Venture Capital Funds		-	0.00%			-	0.00%	0.00%	
i) Others (specify)		-	0.00%			-	0.00%	0.00%	
<b>Sub-total (B)(1):-</b>		-	0.00%		-	-	0.00%	0.00%	
<b>2. Non-Institutions</b>									
a) Bodies Corp.									
i) Indian	-	-	0.00%	643559	0	6,43,559	9.48%	9.48%	
ii) Overseas	-	-	0.00%	0	0	-	0.00%	0.00%	
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	13,650		13,650	0.52%	0	13,650	13,650	0.20%	-0.32%
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	4,90,000		4,90,000	18.67%	712500	17500	7,30,000	10.75%	-7.92%
c) Others (HUF)	2,27,500		2,27,500	8.67%	317500		3,17,500	4.67%	-3.99%
Non Resident Indians			-	0.00%			-	0.00%	0.00%
Overseas Corporate Bodies			-	0.00%			-	0.00%	0.00%
Foreign Nationals			-	0.00%			-	0.00%	0.00%
Clearing Members			-	0.00%			-	0.00%	0.00%
Trusts			-	0.00%			-	0.00%	0.00%
Foreign Bodies - D R			-	0.00%			-	0.00%	0.00%
<b>Sub-total (B)(2):-</b>	<b>7,31,150</b>	<b>-</b>	<b>7,31,150</b>	<b>27.85%</b>	<b>16,73,559</b>	<b>31,150</b>	<b>17,04,709</b>	<b>25.10%</b>	<b>-2.75%</b>
<b>Total Public (B)</b>	<b>7,31,150</b>	<b>-</b>	<b>7,31,150</b>	<b>27.85%</b>	<b>16,73,559</b>	<b>31,150</b>	<b>17,04,709</b>	<b>25.10%</b>	<b>-2.75%</b>
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>				0.00%				0.00%	0.00%
<b>Grand Total (A+B+C)</b>	<b>26,25,000</b>	<b>-</b>	<b>26,25,000</b>	<b>100.00%</b>	<b>67,60,517</b>	<b>31,150</b>	<b>67,91,667</b>	<b>100.00%</b>	<b>0.00%</b>

(ii) Shareholding of Promoter

SN	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged/ encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged/ encumbered to total shares	
1	Alok Agarwalla Huf	6,11,538	23.30%	0.00%	6,11,538	9.00%	0.00%	-14.30%
2	Manoj Agarwalla Huf	6,50,000	24.76%	0.00%	6,50,000	9.57%	0.00%	-15.19%
3	Gajanand Khaitan Huf	6,32,312	24.09%	0.00%	6,32,312	9.31%	0.00%	-14.78%
4	Ayush Agarwalla	-	-	0.00%	7,47,083	11.00%	0.00%	11.00%
5	Suyash Khaitan	-	-	0.00%	4,21,075	6.20%	0.00%	6.20%
6	Dhansar Engg. Co. Pvt. Ltd	-	-	0.00%	16,91,125	24.90%	0.00%	24.90%
7	Alexcy Tracon Private Limited	-	-	0.00%	3,33,825	4.92%	0.00%	4.92%





(iii) Change in Promoters' Shareholding (please specify, if there is no change)

SN	Particulars	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	<b>Alok Agarwalla Huf</b>						
	At the beginning of the year			6,11,538	23.30%	6,11,538	23.30%
	Changes during the year						
	At the end of the year			6,11,538	23.30%	6,11,538	23.30%
2	<b>Manoj Agarwalla Huf</b>						
	At the beginning of the year			6,50,000	24.76%	6,50,000	24.76%
	Changes during the year						
	At the end of the year			6,50,000	24.76%	6,50,000	24.76%
3	<b>Gajanand Khaitan Huf</b>						
	At the beginning of the year			6,32,312	24.09%	6,32,312	24.09%
	Changes during the year						
	At the end of the year			6,32,312	24.09%	6,32,312	24.09%
4	<b>Ayush Agarwalla</b>						
	At the beginning of the year			-	0.00%	7,47,043	11.00%
	Changes during the year		Allot				
	At the end of the year			7,47,043	11.00%	7,47,043	11.00%
5	<b>Suyash Khaitan</b>						
	At the beginning of the year			-	0.00%	4,21,075	6.20%
	Changes during the year		Allot			-	0.00%
	At the end of the year			4,21,075	6.20%	4,21,075	6.20%
6	<b>Dhansar Engg. Co. Pvt. Ltd.</b>						
	At the beginning of the year			-	0.00%	16,91,125	24.90%
	Changes during the year		Allot				
	At the end of the year			16,91,125	24.90%	16,91,125	24.90%
7	<b>Alexcy Tracon Pvt Ltd.</b>						
	At the beginning of the year			-	0.00%	3,33,825	4.92%
	Changes during the year		Allot				
	At the end of the year			3,33,825	4.92%	3,33,825	4.92%

(iv) Shareholding Pattern of top ten Shareholders

(Other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For each of the Top 10 shareholders	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	Gurupriya Housing Pvt Ltd			-		3,32,792	4.90%
2	SRD Credit Pvt Ltd			-		3,10,767	4.58%
3	Vikash Kumar Tulsyan			1,22,500	4.67%	1,97,500	2.91%
4	Chetan Kumar Tulsyan			1,22,500	4.67%	1,92,500	2.83%
5	Chandan Kumar Agarwal (HUF)			1,22,500	4.67%	1,67,500	2.47%
6	Sita Devi			1,05,000	4.00%	1,50,000	2.21%
7	Suresh Kumar Tulsyan (HUF)			1,05,000	4.00%	1,50,000	2.21%
8	Chandra Kala Tulsyan			78,750	3.00%	1,28,750	1.90%
9	Suresh Kumar Tulsyan			43,750	1.67%	45,500	0.67%
10	Gopal Sharma			-	0.00%	17,500	0.26%

(v) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	<b>Ayush Agarwalla</b>						
	At the beginning of the year			-		7,47,083	
	Changes during the year		Allot	-	0.00%	-	0.00%
	At the end of the year			7,47,083		7,47,083	
2	<b>Suyash Khaitan</b>						
	At the beginning of the year					4,21,075	
	Changes during the year		Allot	-	0.00%	-	0.00%
	At the end of the year			4,21,075		4,21,075	

