



ANUP MALLEABLES LIMITED

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

Phone : 06540 - 283311, Fax : 06540 - 283312

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, 2017.

1. FINANCIAL SUMMARY

(Amount in `)

Particulars	As at the end of current reporting period	As at the end of previous reporting period
Total Revenue	31,27,48,759	26,80,88,322
Total Expenses	30,75,78,635	26,31,51,649
Profit or Loss before Exceptional and Extraordinary items and Tax	51,70,124	49,36,673
Less: Exceptional Items	--	--
Less: Extraordinary Items	--	--
Profit or Loss before Tax	51,70,124	49,36,673
Less: Current Tax	9,85,167	9,40,683
MAT Credit	(9,85,167)	(9,40,683)
Deferred Tax	15,76,091	14,54,308
Previous Year Taxes	22,159	--
Profit or Loss After Tax	35,71,874	34,82,365
Add: Balance as per last Balance Sheet	1,37,86,530	1,03,04,165
Balance Transferred to Balance Sheet	1,73,58,404	1,37,86,530

2. COMPANY'S OPERATIONAL PERFORMANCE

Total Revenue

Total income of the Company for the financial year 2016-2017 comprises of Net Sales, work contract receipt and other income amounts to Rs. 3127.49 Lac which is increase of 16.66 % over last year's figure.

Profit Before Tax

Profit before tax for the year under review is Rs 51.70 Lacs, an increase of 4.73 % over the last year's figure.

Profit after Tax

Profit after tax for the year under review is profit of Rs.35.72 Lacs, an increase of 2.57.% over the last year's figure.

Earnings per Share

Earnings per share for the year under review are Rs 0.51 as compared to Rs 0.74 for the last year.

Net worth

Net worth of the Company for the financial year 2016-17 is Rs.1737.48 Lac as against Rs 1701.77 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.

4. TRANSFER TO GENERAL RESERVE

No amount was transferred to reserves during the financial year ended 31st March, 2017.





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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, Complete 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 2017-2018 and we have great pleasure to inform you that sincere efforts of management and workers we achieve the target of 80 bogies manufacture per month till date and following products successfully developed till date –

1. Bogie Frame for LHB Coaches
2. Bogie Bolster for LHB Coaches
3. Bogie Bolster for LHB Air spring Coaches
4. Air Jig Machine for Allminerals Asia Pvt Ltd
5. Side Sill Assly for WAP/WAG-9

Currently company got development order of front Part, Roof assembly, Under frame for LHB Coaches. Company has started business with Railways Coach manufacturing division i.e. Modern Coach Factory, Rail Coach Factory and Integral Coach factory to manufacture extra large fabrication items of LHB Coaches, 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 all the product of LHB Coches for Indian Railways, 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 2016-17, 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

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.





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Foreign Exchange Outgo:

Nature of Expense	(Amount in `)	
	2017-18	2016-17
Purchase of Stores & Spares	11,28,675.00	1,00,420.00

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, 2017 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.

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.





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

The Company has conducted 15 (fifteen) 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

The Board consist of optimum number of Executive and Non- Executive Director including Independent director who have vide and varied experience in the field of business, finance. Education, Pursuant to provision of Section 152(6)(d) of Companies Act, 2013, Mrs. Nikeeta Agarwalla and Mr.Sanjeev Choudhary retires by rotation and being eligible offers himself for reappointment.

24. DECLARATION OF INDEPENDENT DIRECTORS

Company received declaration from each independent directors under the provisions of Section 149(7) of Company Act 2013 that he/she meets

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.





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26. STATUTORY AUDITOR

M/s Ashok Kedia & Company, Chartered Accountants were appointed as Statutory Auditors of the Company 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. SECRETARIAL AUDITOR

During the year, the Company has appointed Mr. rahul Goel, Practicing Company Secretary as Secretarial Auditor of the Company. The Secretarial Audit Report for the Financial year 2016-2017 is annexed herewith to this report, The Secretarial Audit Report does not contain any reservation, qualification or adverse comment.

28. 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.

29. 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.

30. AUDIT COMMITTEE

The composition and terms of reference of the Audit Committee are in accordance with the requirements mandated under section 177 of the Companies Act, 2013 read with the rules made thereunder and Regulation 18 of SEBI (LODR) Regulations, 2015 has been furnished in the Corporate Governance report forming a part of this Annual report.

31. NOMINATION AND REMUNERATION COMMITTEE

The composition and terms of reference of the Audit Committee are in accordance with the requirements mandated under section 178(1) of the Companies Act, 2013 read with the rules made thereunder and Regulation 19 of SEBI (LODR) Regulations, 2015 has been furnished in the Corporate Governance report forming a part of this Annual report.

32. STAKEHOLDER RELATIONSHIP COMMITTEE

The composition and terms of reference of the Audit Committee are in accordance with the requirements mandated under section 178(5) of the Companies Act, 2013 read with the rules made thereunder and Regulation 20 of SEBI (LODR) Regulations, 2015 has been furnished in the Corporate Governance report forming a part of this Annual report.

33. 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.

34. 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





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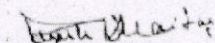
35. LISTING WITH STOCK EXCHANGES

The Company confirms that it has paid the Annual Listing Fees for the year 2016-2017 to BSE and CSE where the Company's Shares are listed.

36. 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


Suyash Khaitan
Director
DIN: 03349868




Ashok Khaitan
Managing Director
DIN: 00293871



Place: Kolkata
Date: 29.05.2017

1/1/1 Sri Mani Bagan Lane, Salkia, Howrah - 711 106

Form No. MR-3
SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED MARCH 31, 2017

(Pursuant to section 204(I) of the Companies Act, 2013 and Rule no. 9 of (Appointment & Remuneration of Managerial Personnel) Rules, 2014)

To,
The Members,
M/s Anup Malleables Limited
46B Rafi Ahmed Kidwai Road
2nd Floor
Kolkata-700 016

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by ANUP MALLEABLES LIMITED (hereinafter called 'the Company'). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that in our opinion, the Company has, during the audit period covering the financial year ended on March 31, 2017, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter.

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on March 31, 2017 and made available to me, according to the provisions of:

- i. The Companies Act, 2013 ('the Act') and the Rules made there under;
- ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the Rules made there under;
- iii. The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- iv. Foreign Exchange Management Act, 1999 and the Rules and Regulations made there under to the extent of Foreign Direct Investment and Overseas Direct Investment and;
- v. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') to the extent applicable to the Company :-
 - a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - c) The Securities and Exchange Board of India (Share based Employee Benefits) Regulations, 2014;
 - d) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - e) The Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015; and



- f) The Company has complied with the requirements under the Equity Listing Agreements entered into with BSE Limited.

I have also examined compliance with the applicable clauses of the Secretarial Standards issued by The Institute of Company Secretaries of India.

I report that, during the year under review, the Company has complied with the provision of the Acts, Rules, Regulations and Guidelines mentioned above.

I further report that there were no events/actions in pursuance of:

- The Securities and Exchange Board of India (Issue of capital and Disclosure Requirements) Regulations, 2009
- The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008
- The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 and
- The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998

requiring compliance thereof by the Company during the audit period.

I further report that the compliance by the Company of applicable financial laws like direct and indirect tax laws and maintenance of financial records and books of accounts has not been reviewed in the Audit since the same have been subject to review by statutory financial audit and other designated professionals.

I further report that the Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

As per the minutes of the meeting duly recorded and signed by the chairman, the decisions of the Board were unanimous and no dissenting views have been recorded.

I further report that based on the information received and records maintained there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that during the audit period there was no event/action having a major bearing on the Company's affairs in pursuance of the above referred laws, rules, regulations guidelines etc.

Rahul Goel
CS RAHUL GOEL
Practicing Company Secretary
Mem. No. 40829/C.P No. 15223



Place: Howrah

Date: 29/05/2017



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FORM NO. MGT 9



ISO : 9001 - 2000

EXTRACT OF ANNUAL RETURN

As on financial year ended on 31.03.2017

Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & 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 th 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-2016]				No. of Shares held at the end of the year [As on 31-March-2017]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(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%
Sub Total (A) (1)	18,93,850	-	18,93,850	72.15%	50,86,958	-	50,86,958	74.90%	2.75%
(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%
Sub Total (A) (2)			-	0.00%			-	0.00%	0.00%
TOTAL (A)	18,93,850	-	18,93,850	72.15%	50,86,958	-	50,86,958	74.90%	2.75%

Regd. Office : 46B, Rafi Ahmed Kidwai Road, 2nd Floor, Kolkata - 700 016 TELEFAX : 91-33-30224544

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B. Public Shareholding									
1. Institutions									
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%	
Sub-total (B)(1):-	-	-	-	0.00%	-	-	-	0.00%	0.00%
2. Non-Institutions									
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	13650	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%
Sub-total (B)(2):-	7,31,150	-	7,31,150	27.85%	16,73,559	31,150	17,04,709	25.10%	-2.75%
Total Public (B)	7,31,150	-	7,31,150	27.85%	16,73,559	31,150	17,04,709	25.10%	-2.75%
C. Shares held by Custodian for GDRs & ADRs			-	0.00%				0.00%	0.00%
Grand Total (A+B+C)	26,25,000	-	26,25,000	100.00%	67,60,517	31,150	67,91,667	100.00%	0.00%

(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	9.00%	0.00%	6,11,538	9.00%	0.00%	0.00%
2	Manoj Agarwalla Huf	6,50,000	9.57%	0.00%	6,50,000	9.57%	0.00%	0.00%
3	Gajanand Khaitan Huf	6,32,312	9.31%	0.00%	6,32,312	9.31%	0.00%	0.00%
4	Ayush Agarwalla	7,47,083	11.00%	0.00%	7,47,083	11.00%	0.00%	11.00%
5	Suyash Khaitan	4,21,075	6.20%	0.00%	4,21,075	6.20%	0.00%	6.20%
6	Dhansar Engg. Co. Pvt. Ltd	16,91,125	24.90%	0.00%	16,91,125	24.90%	0.00%	24.90%
7	Alexcy Tracon Private Limited	3,33,825	4.92%	0.00%	3,33,825	4.92%	0.00%	4.92%

Regd. Office : 46B, Rafi Ahmed Kidwai Road, 2nd Floor, Kolkata - 700 016 TELEFAX : 91-33-30224544

CIN : L27310WB1981PLC033923

