

**TOWER INVESTMENT & TRADING CO. LTD.**

Format of Holding of Specified Securities

1 Name of the Listed entity : **TOWER INVESTMENT & TRADING CO. LTD.**

2 Scrip Code /Name of Scri/ Class of Security : **030092**

3 Share Holding Pattern filed under Reg 31(1)(b) for Quarter ended : **31-Dec-17**

4 **DECLARATION** : The Listed Entity is required to submit the following declaration to the extent of Submission of information :

**Particulars**

- |   |   |           |
|---|---|-----------|
| 1 Whether the Listed Entity has issued any partly paid up shares ?                        | : | <b>NO</b> |
| 2 Whether the Listed Entity has issued any Convertible Securities or Warrants ?           | : | <b>NO</b> |
| 3 Whether the Listed Entity has any shares against which Depository receipts are issued ? | : | <b>NO</b> |
| 4 Whether the Listed Entity has any shares in locked-in ?                                 | : | <b>NO</b> |
| 5 Whether any shares held by Promoters are pledged or otherwise encumbered ?              | : | <b>NO</b> |
| 6 Whether the Listed entity has issued any differential voting rights?                    | : | <b>NO</b> |

**TABLE I : Summary Statement of holding of Specified Securities**

| Category | Category of Shareholder        | No of shareholders | No of fully paid up equity shares held | No of partly paid-up shares held | No of shares underlying depository Receipts | Total No of shares held | Shareholding as a % of total no of shares (as a % of A+B+C2) | Number of Voting Rights held in each class of securities |          |               | No of Shares underlying outstanding convertible securities (including warrants) | Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital A+B+C2) | Number of Locked in shares |                                 | Number of shares pledged or otherwise encumbered | Number of equity shares held in dematerialised form |             |          |
|----------|--------------------------------|--------------------|--|----------------------------------|---|-------------------------|--|--|----------|---------------|---|---|----------------------------|---------------------------------|--|---|-------------|----------|
|          |                                |                    |  |                                  |   |                         |  | (i)  | (ii)     | (iii)         |   |   | (xii)                      | (xiii)                          |  |   |             |          |
| (i)      | (ii)                           | (iii)              | (iv)                                   | (v)                              | (vi)  | (vii) =(iv)+(v)+(vi)    | (viii)   | (ix)   |          |               | (x)   | (xi)=(vii)+(x)  | (xii)                      | (xiii)                          | (xiv)  |   |             |          |
|          |                                |                    |  |                                  |   |                         |  | No of voting rights                                      |          |               |   |   | No (a)                     | As a % of Total shares held (b) | No (a)   | As a % of Total shares held (b)                     |             |          |
|          |                                |                    |  |                                  |   |                         |  | Class  | Class    | Total         | Total as a % of A+B+C   |   |                            |                                 |  |   |             |          |
| A        | Promoter & Promoter Group      | 5                  | 119592                                 | 0                                | 0   | 119592                  | 29.02  | 119592   | 0        | 119592        | 29.02   | 0   | 29.02                      | 0                               | 0  | 0   | 0.00        | 0        |
| B        | Public                         | 184                | 292538                                 | 0                                | 0   | 292538                  | 70.98  | 292538   | 0        | 292538        | 70.98   | 0   | 70.98                      | 0                               | 0  | 0   | 0.00        | 0        |
| C        | Non Promoter -Non Public       | 0                  | 0                                      | 0                                | 0   | 0                       | 0.00   | 0  | NA       | 0             | 0.00  | 0   | 0.00                       | 0                               | 0  | 0   | 0.00        | 0        |
| C1       | Shares underlying DRs          | NA                 | NA                                     | NA                               | NA  | NA                      | NA   | NA   | NA       | NA            | NA  | NA  | NA                         | NA                              | NA   | NA  | NA          | NA       |
| C2       | Shares held by Employee Trusts | NA                 | NA                                     | NA                               | NA  | NA                      | NA   | NA   | NA       | NA            | NA  | NA  | NA                         | NA                              | NA   | NA  | NA          | NA       |
|          | <b>Total</b>                   | <b>189</b>         | <b>412130</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>412130</b>           | <b>100.00</b>  | <b>412130</b>  | <b>0</b> | <b>412130</b> | <b>100.00</b>   | <b>0</b>  | <b>100.00</b>              | <b>0</b>                        | <b>0</b>   | <b>0</b>  | <b>0.00</b> | <b>0</b> |

**Note :** Promoter and Promoter Group shall have the same meaning as defined under SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009

**TABLE II : Statement showing Shareholding Pattern of Promoter and Promoter Group**

|          | Category and Name of the Shareholders                    | PAN        | No of shareholders | No of fully paid up equity shares held | No of partly paid-up shares held | No of shares underlying Depository Receipts | Total No of shares held | Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2) | Number of Voting Rights held in each class of securities |          |               | No of shares underlying outstanding convertible securities (including warrants) | Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital A+B+C2) | Number of Locked in shares      |                                 | Number of shares pledged or otherwise encumbered | Number of equity shares held in dematerialised form |             |
|----------|--|------------|--------------------|--|----------------------------------|---|-------------------------|---|--|----------|---------------|---|---|---------------------------------|---------------------------------|--|---|-------------|
|          |  |            |                    |  |                                  |   |                         |   | Class X  | Class Y  | Total         |   |   | No (a)                          | As a % of Total shares held (b) |  |   |             |
|          | (I)  | (II)       | (III)              | (IV)                                   | (V)                              | (VI)  | VII = (IV+V+VI)         | (VIII)  | (IX)   |          |               | (X)   | XI = (VII+X) as a % of (A+B+C2)   | (XII)                           |                                 | (XIII)   | (XIV)   |             |
|          |  |            |                    |  |                                  |   |                         |   | No of voting rights                                      |          |               | Total as a % of total voting rights   |   | As a % of Total shares held (b) | No (a)                          | As a % of Total shares held (b)                  |   |             |
|          |  |            |                    |  |                                  |   |                         | Class X   | Class Y  | Total    |               |   |   |                                 |                                 |  |   |             |
| <b>1</b> | <b>Indian</b>  |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (a)      | Individuals/ HUF   |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
|          | a) RAKESH HIMATSINGKA                                    | AARPH8054L | 1                  | 20100                                  | 0                                | 0   | 20100                   | 4.88  | 20100  | 0        | 20100         | 4.88  | 0   | 4.88                            | 0                               | 0  | 0   | 0.00        |
|          | b) ANITA HIMATSINGKA                                     | AATPH7918M | 1                  | 100                                    | 0                                | 0   | 100                     | 0.02  | 100  | 0        | 100           | 0.02  | 0   | 0.02                            | 0                               | 0  | 0   | 0.00        |
|          | c) MAALIKA HIMATSINGKA                                   | AASPH3214R | 1                  | 12500                                  | 0                                | 0   | 12500                   | 3.03  | 12500  | 0        | 12500         | 3.03  | 0   | 3.03                            | 0                               | 0  | 0   | 0.00        |
|          | e) SHAURYA VEER HIMATSINGKA                              | ABAPH9832J | 1                  | 63092                                  | 0                                | 0   | 63092                   | 15.31   | 63092  | 0        | 63092         | 15.31   | 0   | 15.31                           | 0                               | 0  | 0   | 0.00        |
|          | g) RAKESH KR. SHAURYA VEER (HUF)                         | AADHR9607P | 1                  | 23800                                  | 0                                | 0   | 23800                   | 5.77  | 23800  | 0        | 23800         | 5.77  | 0   | 5.77                            | 0                               | 0  | 0   | 0.00        |
| (b)      | Central/State Governments                                |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (c)      | Financial Institutions/Banks                             |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (d)      | Any Other (specify)                                      |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
|          | i) Bodies Corporate                                      |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
|          | <b>Sub-Total (A)(1)</b>                                  |            | <b>5</b>           | <b>119592</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>119592</b>           | <b>29.02</b>  | <b>119592</b>  | <b>0</b> | <b>119592</b> | <b>29.02</b>  | <b>0</b>  | <b>29.02</b>                    | <b>0</b>                        | <b>0</b>   | <b>0</b>  | <b>0.00</b> |
| <b>2</b> | <b>Foreign</b>   |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (a)      | Individuals (NRI/Foreign)                                |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (b)      | Government   |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (c)      | Institutions   |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (d)      | Foreign Portfolio Investor                               |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
| (e)      | Any other  |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
|          | <b>Sub-Total (A)(2)</b>                                  |            | <b>0</b>           | <b>0</b>                               | <b>0</b>                         | <b>0</b>                                    | <b>0</b>                | <b>0.00</b>   | <b>0</b>   | <b>0</b> | <b>0</b>      | <b>0.00</b>   | <b>0</b>  | <b>0</b>                        | <b>0</b>                        | <b>0</b>   | <b>0</b>  | <b>0.00</b> |
|          | <b>Total Shareholding of Promoter and Promoter Group</b> |            |                    |  |                                  |   |                         |   |  |          |               |   |   |                                 |                                 |  |   |             |
|          | <b>(A) = (A)(1) + (A)(2)</b>                             |            | <b>5</b>           | <b>119592</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>119592</b>           | <b>29.02</b>  | <b>119592</b>  | <b>0</b> | <b>119592</b> | <b>29.02</b>  | <b>0</b>  | <b>29.02</b>                    | <b>0</b>                        | <b>0</b>   | <b>0</b>  | <b>0.00</b> |

Note :

1. PAN Would not be displayed on website of stock exchanges

2. The term "encumbrance" has the same meaning as assigned under Regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations,2011

TABLE III : Statement showing Shareholding Pattern of Public shareholder

|          | Category and Name of the Shareholders  | PAN        | No of shareholders | No of fully paid up equity shares held | No of partly paid-up shares held | No of shares underlying Depository Receipts | Total No of shares held | Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2) | Number of Voting Rights held in each class of securities |          |               | No of shares underlying outstanding convertible securities (including warrants) | Total Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital) | Number of Locked in shares |             | Number of shares pledged or otherwise encumbered | Number of equity shares held in dematerialised form |             |                                 |        |       |
|----------|--|------------|--------------------|--|----------------------------------|---|-------------------------|---|--|----------|---------------|---|--|----------------------------|-------------|--|---|-------------|---------------------------------|--------|-------|
|          |  |            |                    |  |                                  |   |                         |   | (IX)   |          |               |   |  | (X)                        | XI          |  |   | (XII)       |                                 | (XIII) | (XIV) |
|          |  |            |                    |  |                                  |   |                         |   | Class X  | Class Y  | Total         |   |  |                            |             |  |   | No (a)      | As a % of Total shares held (b) |        |       |
| <b>1</b> | <b>Institutions</b>  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (a)      | Mutual Funds   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (b)      | Venture Capital Funds  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (c)      | Alternate Investment funds   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (d)      | Foreign Venture Capital Investors  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (e)      | Foreign Portfolio Investors  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (f)      | Financial Institutions/Banks   |            | 0                  | 0                                      | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
| (g)      | Insurance Companies  |            | 0                  | 0                                      | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
| (h)      | Provident /Pension Funds   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (i)      | Any Other (specify)  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
|          | <b>Sub-Total (B)(1)</b>  |            | <b>0</b>           | <b>0</b>                               | <b>0</b>                         | <b>0</b>                                    | <b>0</b>                | <b>0.00</b>   | <b>0</b>   | <b>0</b> | <b>0</b>      | <b>0</b>  | <b>0.00</b>  | <b>0</b>                   | <b>0.00</b> | <b>0</b>   | <b>0.00</b>   | <b>0</b>    | <b>0</b>                        |        |       |
| <b>2</b> | <b>Central/State Government/</b>   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
|          | President of India   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
|          | <b>Sub-Total (B)(2)</b>  |            | <b>0</b>           | <b>0</b>                               | <b>0</b>                         | <b>0</b>                                    | <b>0</b>                | <b>0.00</b>   | <b>0</b>   | <b>0</b> | <b>0</b>      | <b>0.00</b>   | <b>0</b>   | <b>0.00</b>                | <b>0</b>    | <b>0.00</b>                                      | <b>0</b>  | <b>0.00</b> | <b>0</b>                        |        |       |
| <b>3</b> | <b>Non-Institutions</b>  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (a)      | (i) Individual shareholders holding nominal share capital upto Rs 2 lakhs          |            | 181                | 123726                                 | 0                                | 0   | 123726                  | 30.02   | 123726   | 0        | 123726        | 30.02   | 0  | 30.02                      | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
|          | (ii) Individual shareholders holding nominal share capital in excess of Rs 2 lakhs |            | 0                  | 0                                      | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
| (b)      | NBFCs registered with RBI  |            | 0                  |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (c)      | Employee Trusts  |            | 0                  |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (d)      | Overseas Depositories  |            | 0                  |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
| (e)      | Any other  |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
|          | Bodies Corporate   |            |                    |  | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
|          | Khatu Investment & Trading Co. Ltd.  | AABCK0786D | 1                  | 64138                                  | 0                                | 0   | 64138                   | 15.56   | 64138  | 0        | 64138         | 15.56   | 0  | 15.56                      | 0           | 0  | 0   | 0.00        | 0                               |        |       |
|          | Burlington Investments Pvt. Ltd.   | AABCB0767F | 1                  | 30570                                  | 0                                | 0   | 30570                   | 7.42  | 30570  | 0        | 30570         | 7.42  | 0  | 7.42                       | 0           | 0  | 0   | 0.00        | 0                               |        |       |
|          | New Look Investment (Bengal) Ltd.  | AABCN0486F | 1                  | 74104                                  | 0                                | 0   | 74104                   | 17.98   | 74104  | 0        | 74104         | 17.98   | 0  | 17.98                      | 0           | 0  | 0   | 0.00        | 0                               |        |       |
|          | Non Resident Indian  |            |                    |  | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
|          | Investor Education & Protection Fund   |            |                    |  | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
|          | Trust  |            |                    |  | 0                                | 0   | 0                       | 0.00  | 0  | 0        | 0             | 0.00  | 0  | 0.00                       | 0           | 0.00   | 0   | 0.00        | 0                               |        |       |
|          | <b>Sub-Total (B)(3)</b>  |            | <b>184</b>         | <b>292538</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>292538</b>           | <b>70.98</b>  | <b>292538</b>  | <b>0</b> | <b>292538</b> | <b>70.98</b>  | <b>0</b>   | <b>70.98</b>               | <b>0</b>    | <b>0</b>   | <b>0</b>  | <b>0</b>    | <b>0</b>                        |        |       |
|          | <b>Total Public Shareholding</b>   |            |                    |  |                                  |   |                         |   |  |          |               |   |  |                            |             |  |   |             |                                 |        |       |
|          | <b>(B) = (B)(1)+(B)(2)+(B)(3)</b>  |            | <b>184</b>         | <b>292538</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>292538</b>           | <b>70.98</b>  | <b>292538</b>  | <b>0</b> | <b>292538</b> | <b>70.98</b>  | <b>0</b>   | <b>70.98</b>               | <b>0</b>    | <b>0</b>   | <b>0</b>  | <b>0</b>    | <b>0</b>                        |        |       |

Details of the shareholders acting as persons in Concert including their Shareholding (No and %) :

Details of shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc :

