

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 Scrip/ Class of Security : 030092

3 Share Holding Pattern filed under Reg 31(1)(b) for Quarter ended : 30-Sep-19

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 ? : 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 pledged or otherwise encumbered ? : NO
- 6 Whether the Listed entity has issued any differential voting rights? : NO

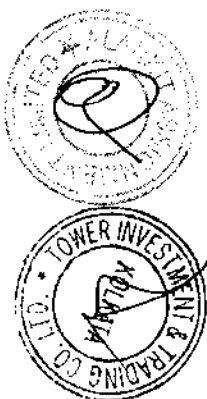


TABLE I - Summary Statement of holding of Specified Securities

Name of the Company: Tower Investment & Trading Co. Ltd

Quarter ended: 30.09.2019

Face Value 10.00

Category	(i)	(ii) Category of Shareholder	(iii) No of shareholders	(iv) No of fully paid up equity shares held	(v) No of partly paid-up shares held	(vi) No of shares underlying depository Receipts	(vii) Total No of shares held (vii) = (iv)+(v)+(vi)	(viii) Shareholding as a % of total no of shares (as a % of A+B+C2)	(ix) Number of Voting Rights held in each class of securities			(x) No of shares underlying outstanding convertible securities (including	(xi) Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share (xi) = (vii)+(x)	(xii) Number of Locked in shares		(xiii) Number of shares pledged or otherwise encumbered		(xiv) Number of equity shares held in dematerialised form
									Class	Class	Total			Total as a % of A+B+C	No (a)	As a % of Total shares held (b)	No (a)	
A	Promoter & Promoter Group	8	288404	0	0	0	288404	69.98	288404	0	288404	69.98	0	0	0	0.00	0	0
B	Public	181	123726	0	0	0	123726	30.02	123726	0	123726	30.02	0	0	0	0.00	0	0
C	Non Promoter - Non Public	0	0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	0	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
Total		189	412130	0	0	0	412130	100.00	412130	0	412130	100.00	0	0	0	0.00	0	0

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
 Name of the Company: Tower Investment & Trading Co. Ltd
 Quarter ended: 30.09.2019
 Face Value 10.00

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 VII = (IV+V+VI)	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) XI = (VII+X) as a % of (A+B+C2)	Number of Locked in shares	Number of shares pledged or otherwise encumbered	Number of equity shares held in dematerialised form
								(IX)	(X)					
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)	No of voting rights Class X Class Y Total		(ix)	XI = (VII+X) as a % of (A+B+C2)	(xii)	(xiii)	(xiv)
								Total as a % of total voting rights				AS a % of Total shares held (b)	AS a % of Total shares held (b)	
1 Indian														
(a) Individuals/ HUF														
a) RAKESH HIMATSINGKA	AARPH8054L	1	20100	0	0	20100	4.88	20100	0	20100	4.88	0	0	0.00
b) ANITA HIMATSINGKA	AA1PH7918M	1	100	0	0	100	0.02	100	0	100	0.02	0	0	0.00
c) MAALIKA HIMATSINGKA	AA5PH3214R	1	12500	0	0	12500	3.03	12500	0	12500	3.03	0	0	0.00
e) SHAURYA VEER HIMATSINGKA	ABAP98832J	1	63092	0	0	63092	15.31	63092	0	63092	15.31	0	0	0.00
g) RAKESH KR. SHAURYA VEER (HUF)	AAHDR9607P	1	23800	0	0	23800	5.77	23800	0	23800	5.77	0	0	0.00
(b) Central/State Governments														
(c) Financial Institutions/Banks														
(d) Any Other (specify)														
(i) Bodies Corporate														
a) Khatu Investment & Trading Co. Ltd.	AABCK0786D	1	64138	0	0	64138	15.56	64138	0	64138	15.56	0	0	0.00
b) New Look Investment Bengal Ltd.	AABCM0486F	1	74104	0	0	74104	17.98	74104	0	74104	17.98	0	0	0.00
c) Burlington Investments Pvt. Ltd.	AABCB0767F	1	30570	0	0	30570	7.42	30570	0	30570	7.42	0	0	0.00
Sub-Total (A)(1)		8	288404	0	0	288404	69.98	288404	0	288404	69.98	0	0	0.00
2 Foreign														
(a) Individuals (NRI/Foreign)														
(b) Government														
(c) Institutions														
(d) Foreign Portfolio Investor														
(e) Any other														
Sub-Total (A)(2)		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0.00
Total Shareholding of Promoter and Promoter Group		8	288404	0	0	288404	69.98	288404	0	288404	69.98	0	0	0.00
(A) = (A)(1) + (A)(2)		8	288404	0	0	288404	69.98	288404	0	288404	69.98	0	0	0.00

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

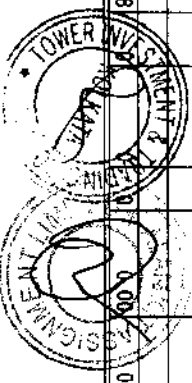


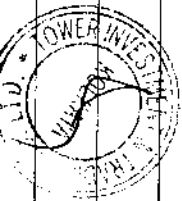
TABLE III : Statement showing Shareholding Pattern of Public shareholder

Name of the Company: Tower Investment & Trading Co. Ltd
 Quarter ended: 30.09.2019
 Face Value 10.00

(i) Category and Name of the Shareholders	(ii) PAN	(iii) No of shareholders	(iv) No of fully paid up equity shares held	(v) No of partly paid-up shares held	(vi) No of shares underlying Depository Receipts	(vii) Total No of shares held $VII = (IV+V+VI)$	(viii) Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2)	(ix) Number of Voting Rights held in each class of securities			(x) No of shares underlying outstanding convertible securities (including warrants)	(xi) Total Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital)	(xii) Number of Locked in shares	(xiii) Number of shares pledged or otherwise encumbered	(xiv) Number of equity shares held in dematerialised form
								No of voting rights	Total as a % of total voting rights	Total					
								Class X	Class Y	Total					
1 Institutions															
(a) Mutual Funds															
(b) Venture Capital Funds															
(c) Alternate Investment funds															
(d) Foreign Venture Capital Investors															
(e) Foreign Portfolio Investors															
(f) Financial Institutions/Banks															
(g) Insurance Companies															
(h) Provident/Pension Funds															
(i) Any Other (specify)															
Sub-Total (B)(1)															
2 Central/State Government/ President of India															
Sub-Total (B)(2)															
3 Non-Institutions															
(a) Individual shareholders holding nominal share capital upto Rs 2 lakhs		181	123726	0	0	123726	30.02	123726	0	123726	30.02	0	0	0.00	
(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	0.00	
(b) NBFCs registered with RBI		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0.00	
(c) Employee Trusts		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0.00	
(d) Overseas Depositories		0	0	0	0	0	0.00	0	0	0	0.00	0	0	0.00	
(e) Any other															
Bodies Corporate															
Non Resident Indian															
Investor Education & Protection Fund															
Trust															
Sub-Total (B)(3)		181	123726	0	0	123726	30.02	123726	0	123726	30.02	0	0	0.00	
Total Public Shareholding		181	123726	0	0	123726	30.02	123726	0	123726	30.02	0	0	0.00	
(B) = (B)(1)+(B)(2)+(B)(3)		181	123726	0	0	123726	30.02	123726	0	123726	30.02	0	0	0.00	

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/undelivered suspense account, voting rights which are frozen etc.



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Table V - Statement showing details of significant beneficial owners (SBOs)

Name of the Company: Tower Investment & Trading Co. Ltd.

Quarter ended: 30.09.2019

Face Value 10.00

Sr. No.	Details of the Significant Beneficial Owner (SBO)		Details of the Registered Owner		Details of holding/ exercise of right of the SBO in the reporting Company, whether direct or indirect *					Date of creation/ acquisition of significant beneficial interest #
	Name	Nationality	Name	Nationality	Shares %	Voting Rights %	Rights on Distributable (%) Dividend or any other Distribution	Exercise of Control	Exercise of Significant Influence	
1	Rakesh Himatsingka	Indian	Direct Holding	Indian	4.88	4.88	NO	YES	YES	
2	Anita Himatsingka	Indian	Direct Holding	Indian	0.02	0.02	NO	YES	YES	
3	Shaurya Veer Himatsingka	Indian	Direct Holding	Indian	15.31	15.31	NO	YES	YES	
4	Rakesh Kumar Shaurya Veer HUF		Direct Holding		5.77	5.77	NO	YES	YES	
5	Maalika Himatsingka	Indian	Direct Holding	Indian	3.03	3.03	NO	YES	YES	

* In case the nature of the holding/ exercise of the right of a SBO falls under multiple categories specified under (a) to (e) under Column III, multiple rows for the same SBO shall be inserted accordingly for each of the categories.

This column shall have the details as specified by the listed entity under Form No. BEN-2 as submitted to the Registrar.

