

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

Format of Holding of Specified Securities

: TOWER INVESTMENT & TRADING CO. LTD.

1 Name of the Listed entity

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

030092

3 Share Holding Pattern filed under Reg 31(1)(b) for Quarter ended

30-Sep-20

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 ?
- 2 Whether the Listed Entity has issued any Convertible Securities or Warrants ?
- 3 Whether the Listed Entity has any shares against which Depository receipts are issued ?
- 4 Whether the Listed Entity has any shares in locked-in ?
- 5 Whether any shares held by Promoters are pledged or otherwise encumbered ?
- 6 Whether the Listed entity has issued any differential voting rights?

NO  
NO  
NO  
NO  
NO  
NO

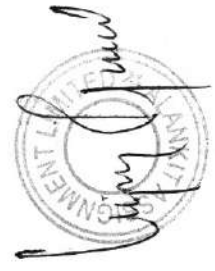


TABLE I : Summary Statement of holding of Specified Securities

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

Quarter ended: 30.09.2020

Face Value 10.00

| Category     | Category of Shareholder        | (i)        | (ii)          | (iii)    | (iv)     | (v)           | (vi)     | (vii) = (iv)+(v)+(vi) | (viii)        | (ix)                               |                   |  | Total as a % of A+B+C | (x)      | (xi) = (vii)+(x) | (xii)               |          | (xiii)      |               | (xiv)    |
|--------------|--------------------------------|------------|---------------|----------|----------|---------------|----------|-----------------------|---------------|------------------------------------|-------------------|--|-----------------------|----------|------------------|---------------------|----------|-------------|---------------|----------|
|              |                                |            |               |          |          |               |          |                       |               | No of shares underlying securities | No of shares held | Shareholding as a % of total no of shares (as a % of A+B+C2) |                       |          |                  | No of voting rights | Class    | Class       | Total         |          |
| A            | Promoter & Promoter Group      | 8          | 288404        | 0        | 0        | 288404        | 0        | 288404                | 69.98         | 0                                  | 288404            | 69.98  | 0                     | 0        | 69.98            | 0                   | 0        | 0.00        | 288404        | 0        |
| B            | Public                         | 181        | 123726        | 0        | 0        | 123726        | 0        | 123726                | 30.02         | 0                                  | 123726            | 30.02  | 0                     | 0        | 30.02            | 0                   | 0        | 0.00        | 500           | 0        |
| C            | Non Promoter -Non Public       | 0          | 0             | 0        | 0        | 0             | 0        | 0                     | 0.00          | 0                                  | 0                 | 0.00   | 0                     | 0        | 0.00             | 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          | 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          | NA            | NA       |
| <b>Total</b> |                                | <b>189</b> | <b>412130</b> | <b>0</b> | <b>0</b> | <b>412130</b> | <b>0</b> | <b>412130</b>         | <b>100.00</b> | <b>0</b>                           | <b>412130</b>     | <b>100.00</b>  | <b>0</b>              | <b>0</b> | <b>100.00</b>    | <b>0</b>            | <b>0</b> | <b>0.00</b> | <b>288904</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

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

Quarter ended: 30.09.2020

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) | Number of Locked in shares |          | Number of shares pledged or otherwise encumbered |             | Number of equity shares held in dematerialised form |               |
|--|------------|--------------------|--|----------------------------------|---|---|---|--|----------|---|--|----------------------------|----------|--|-------------|---|---------------|
|  |            |                    |  |                                  |   |   |   | Class X  | Class Y  |   |  | (a)                        | (b)      | (a)  | (b)         |   | (X)           |
| <b>1 Indian</b>  |            |                    |  |                                  |   |   |   |  |          |   |  |                            |          |  |             |   |               |
| (a) Individuals/ HUF                                     |            |                    |  |                                  |   |   |   |  |          |   |  |                            |          |  |             |   |               |
| a) RAKESH HIMATSINGKA                                    | AARPH8054L | 1                  | 20100                                  | 0                                | 0   | 20100                                     | 4.88  | 20100  | 0        | 20100   | 4.88   | 0                          | 0        | 0  | 0.00        | 0.00  | 20100         |
| b) ANITA HIMATSINGKA                                     | AATPH7918M | 1                  | 100                                    | 0                                | 0   | 100                                       | 0.02  | 100  | 0        | 100   | 0.02   | 0                          | 0        | 0  | 0.00        | 0.00  | 100           |
| c) MAALIKA HIMATSINGKA                                   | AASPH3214R | 1                  | 12500                                  | 0                                | 0   | 12500                                     | 3.03  | 12500  | 0        | 12500   | 3.03   | 0                          | 0        | 0  | 0.00        | 0.00  | 12500         |
| e) SHAURYA VEER HIMATSINGKA                              | ABAPH9832J | 1                  | 63092                                  | 0                                | 0   | 63092                                     | 15.31   | 63092  | 0        | 63092   | 15.31  | 0                          | 0        | 0  | 0.00        | 0.00  | 63092         |
| g) RAKESH KR. SHAURYA VEER (HUF)                         | AADHR9607P | 1                  | 23800                                  | 0                                | 0   | 23800                                     | 5.77  | 23800  | 0        | 23800   | 5.77   | 0                          | 0        | 0  | 0.00        | 0.00  | 23800         |
| (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  | 0.00        | 0.00  | 64138         |
| b) New Look Investment Bengal Ltd.                       | AABCN0486F | 1                  | 74104                                  | 0                                | 0   | 74104                                     | 17.98   | 74104  | 0        | 74104   | 17.98  | 0                          | 0        | 0  | 0.00        | 0.00  | 74104         |
| c) Burlington Investments Pvt. Ltd.                      | AABCB0767F | 1                  | 30570                                  | 0                                | 0   | 30570                                     | 7.42  | 30570  | 0        | 30570   | 7.42   | 0                          | 0        | 0  | 0.00        | 0.00  | 30570         |
| <b>Sub-Total (A)(1)</b>                                  |            | <b>8</b>           | <b>288404</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>288404</b>                             | <b>69.98</b>  | <b>288404</b>  | <b>0</b> | <b>288404</b>   | <b>69.98</b>   | <b>0</b>                   | <b>0</b> | <b>0</b>   | <b>0</b>    | <b>0</b>  | <b>288404</b> |
| <b>2 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</b>      |
| <b>Total Shareholding of Promoter and Promoter Group</b> |            | <b>8</b>           | <b>288404</b>                          | <b>0</b>                         | <b>0</b>                                    | <b>288404</b>                             | <b>69.98</b>  | <b>288404</b>  | <b>0</b> | <b>288404</b>   | <b>69.98</b>   | <b>0</b>                   | <b>0</b> | <b>0</b>   | <b>0.00</b> | <b>0.00</b>   | <b>288404</b> |
| <b>(A) = (A)(1) + (A)(2)</b>                             |            |                    |  |                                  |   |   |   |  |          |   |  |                            |          |  |             |   |               |

Note :

- PAN Would not be displayed on website of stock exchanges
- 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: 30.09.2020

Face Value 10.00

| Category and Name of the Shareholders  | 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 = (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 |
|--|-----|--------------------------|---|--------------------------------------|--|-----------------|--|---|---------|--------|---|---|----------------------------------|---------------------------------|---|---------------------------------|---|
|  |     |                          |   |                                      |  |                 |  | Total as a % of total voting rights                           |         |        |   |   | As a % of Total shares held (b)  | As a % of Total shares held (a) | As a % of Total shares held (b)                         | As a % of Total shares held (a) |   |
|  |     |                          |   |                                      |  |                 |  | Class X   | Class Y | Total  |   |   |                                  |                                 |   |                                 |   |
| <b>1 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   |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (g) Insurance Companies  |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (h) Provident /Pension Funds   |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (i) Any Other (specify)  |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| Sub-Total (B)(1)   |     | 0                        | 0   | 0                                    | 0  | 0               | 0.00   | 0   | 0       | 0      | 0   | 0.00  | 0                                | 0                               | 0   | 0                               | 0   |
| <b>2 Central/State Government/ President of India</b>                              |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| Sub-Total (B)(2)   |     | 0                        | 0   | 0                                    | 0  | 0               | 0.00   | 0   | 0       | 0      | 0   | 0.00  | 0                                | 0                               | 0   | 0                               | 0   |
| <b>3 Non-Institutions</b>  |     |                          |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (i) Individual shareholders holding nominal share capital upto Rs 2 lakhs          |     | 181                      | 123726                                      | 0                                    | 0  | 123726          | 30.02  | 123726  | 0       | 123726 | 30.02   | 30.02   | 0                                | 0                               | 0   | 0                               | 500   |
| (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  | 0.00  | 0                                | 0                               | 0   | 0                               | 0   |
| (b) NBFCs registered with RBI  |     | 0                        |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (c) Employee Trusts  |     | 0                        |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (d) Overseas Depositories  |     | 0                        |   |                                      |  |                 |  |   |         |        |   |   |                                  |                                 |   |                                 |   |
| (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   | 30.02   | 0                                | 0                               | 0   | 0                               | 500   |
| Total Public Shareholding  |     | 181                      | 123726                                      | 0                                    | 0  | 123726          | 30.02  | 123726  | 0       | 123726 | 30.02   | 30.02   | 0                                | 0                               | 0   | 0                               | 500   |
| (B) = (B)(1)+(B)(2)+(B)(3)   |     | 181                      | 123726                                      | 0                                    | 0  | 123726          | 30.02  | 123726  | 0       | 123726 | 30.02   | 30.02   | 0                                | 0                               | 0   | 0                               | 500   |

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. :



**TABLE IV : Statement showing Shareholding Pattern of Non Promoter - Non Public Shareholder**

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

Quarter ended: 30.09.2020

Face Value 10.00

| (I)<br>Category and Name of the Shareholders  | (II)<br>PAN | (III)<br>No of shareholders | (IV)<br>No of fully paid up equity shares held | (V)<br>No of partly paid-up shares held | (VI)<br>No of shares underlying Depository Receipts | VII =<br>(IV+V+VI)<br>Total No of shares held | (VIII)<br>Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2) | (IX)<br>Number of Voting Rights held in each class of securities |                     |       | (X)<br>No of shares underlying outstanding convertible securities (including warrants) | XI<br>Total Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital) | (XII)<br>Number of Locked in shares |                       | (XIII)<br>Number of shares pledged or otherwise encumbered |                       | (XIV)<br>Number of equity shares held in dematerialised form |
|---|-------------|-----------------------------|--|---|---|---|---|--|---------------------|-------|--|--|-------------------------------------|-----------------------|--|-----------------------|--|
|   |             |                             |  |   |   |   |   | Class  | No of voting rights | Total |  |  | As a % of Total                     | Total shares held (b) | As a % of Total  | Total shares held (b) |  |
| 1   |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |
| (a) Name of DR Holder   |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |
| 2   |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |
| (a) Name  |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |
| Employee Benefit Trust<br>(under SEBI Share based employee Benefit) Regulations, 2014 |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |
| Total non Promoter-non-Public Shareholding (C)= (C)(1) + (C)(2)                       |             |                             |  |   |   |   |   |  |                     |       |  |  |                                     |                       |  |                       |  |

1 Custodian/DR Holder

(a) Name of DR Holder

2 Employee Benefit Trust

(under SEBI Share based employee Benefit) Regulations, 2014

(a) Name

Total non Promoter-non-Public Shareholding (C)= (C)(1) + (C)(2)

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

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

Quarter ended: 30.09.2020

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                  |             | 4.88  | 4.88            | NO   | YES                 | YES                               |  |
| 2       | Anita Himatsingka                                 | Indian      | Direct Holding                  |             | 0.02  | 0.02            | NO   | YES                 | YES                               |  |
| 3       | Shaurya Veer Himatsingka                          | Indian      | Direct Holding                  |             | 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                  |             | 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.