

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-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 ? | 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 |

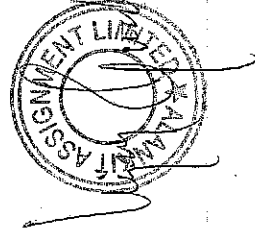


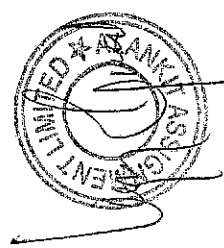
TABLE I : Summary Statement of holding of Specified Securities

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

Quarter ended: 31.12.2020

Face Value 10.00

Category	(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii) = (iv)+(v)+(vi)	(viii)	(ix)			(x)	(xi) = (vii)+(x)	(xii)		(xiii)	(xiv)
									No of voting rights					No of shares underlying convertible securities (including securities assuming full conversion as a % of diluted share)	As a % of Total shares held (b)		
Number of Voting Rights held in each class of securities			Class	Total	Total as a % of A+B+C		No of shares underlying securities (including securities assuming full conversion as a % of diluted share)	As a % of Total shares held (a)	As a % of Total shares held (b)	No (a)	As a % of Total shares held (b)	Number of shares pledged or otherwise encumbered	Number of equity shares held in dematerialised form				
A	Promoter & Promoter Group	8	288404	0	288404	0								288404	69.98	288404	0
B	Public	181	123726	0	123726	0	123726	30.02	123726	0	30.02	0	0	0.00	0	500	
C	Non Promoter-Non Public	0	0	0	0	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	
C2	Shares held by Employee Trusts	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	
Total		189	412130	0	412130	0	412130	100.00	412130	0	100.00	0	0	0.00	0	288904	



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: 31.12.2020
 Face Value 10.00

Category and Name of the Shareholders	PAN	(I)	(II)	(III)	(IV)	(V)	(VI)	Total No of shares held (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)	Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share)	(XII) Number of Locked in shares	(XIII) Number of shares pledged or otherwise encumbered	(XIV) Number of equity shares held in dematerialised form
										% of total voting rights						
										No of voting rights	Total					
		Class X	Class Y													
1 Indian																
(a) Individuals/ HUF																
a) RAKESH HIMATSIINGKA	AARPH8054L	1	20100	0	0	0	20100	4.88	4.88	4.88	0	4.88	0	0	0.00	20100
b) ANITA HIMATSIINGKA	AATPH7918M	1	100	0	0	0	100	0.02	0.02	0.02	0	0.02	0	0	0.00	100
c) MAALIKA HIMATSIINGKA	AASPH3214R	1	12500	0	0	0	12500	3.03	3.03	3.03	0	3.03	0	0	0.00	12500
e) SHAURYA VEER HIMATSIINGKA	ABAPH9832J	1	63092	0	0	0	63092	15.31	15.31	15.31	0	15.31	0	0	0.00	63092
g) RAKESH KR. SHAURYA VEER (HUF)	AADHR9607P	1	23800	0	0	0	23800	5.77	5.77	5.77	0	5.77	0	0	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	0	64138	15.56	15.56	15.56	0	15.56	0	0	0.00	64138
b) New Look Investment Bengal Ltd.	AABCN0486F	1	74104	0	0	0	74104	17.98	17.98	17.98	0	17.98	0	0	0.00	74104
c) Burlington Investments Pvt. Ltd.	AABCB0767F	1	30570	0	0	0	30570	7.42	7.42	7.42	0	7.42	0	0	0.00	30570
Sub-Total (A)(1)		8	288404	0	0	0	288404	69.98	69.98	69.98	0	69.98	0	0	0.00	288404
2 Foreign																
(a) Individuals (NR/Foreign)																
(b) Government																
(c) Institutions																
(d) Foreign Portfolio Investor																
(e) Any other																
Sub-Total (A)(2)		0	0	0	0	0	0	0.00	0.00	0.00	0	0.00	0	0	0.00	0
Total Shareholding of Promoter and Promoter Group																
(A) = (A)(1) + (A)(2)		8	288404	0	0	0	288404	69.98	69.98	69.98	0	69.98	0	0.00	0.00	288404

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

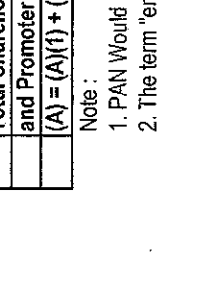


TABLE III : Statement showing Shareholding Pattern of Public shareholder

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

Quarter ended: 31.12.2020

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 % 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
								% of total voting rights					As a % of shares held (b)	As a % of shares held (a)	As a % of shares held (b)	As a % of shares held (a)	
								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)		0	0	0	0	0	0.00	0	0	0	0	0.00	0	0.00	0	0.00	0
2 Central/State Government/ President of India																	
Sub-Total (B)(2)		0	0	0	0	0	0.00	0	0	0	0	0.00	0	0.00	0	0.00	0
3 Non-Institutions																	
(i) Individual shareholders holding nominal share capital upto Rs 2 lakhs		181	123726	0	0	123726	30.02	123726	0	123726	0	30.02	0	0.00	0	0.00	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	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																	
Non Resident Indian																	
Investor Education & Protection Fund																	
Trust																	
Sub-Total (B)(3)		181	123726	0	0	123726	30.02	123726	0	123726	0	30.02	0	0.00	0	0.00	500
Total Public Shareholding																	
(B) = (B)(1)+(B)(2)+(B)(3)		181	123726	0	0	123726	30.02	123726	0	123726	0	30.02	0	0.00	0	0.00	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. :

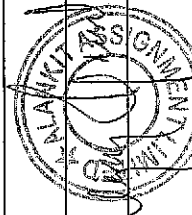


TABLE IV : Statement showing Shareholding Pattern of Non Promoter - Non Public Shareholder

Name of the Company: Tower Investment & Trading Co. Ltd.
 Quarter ended: 31.12.2020
 Face Value 10.00

Category and Name of the Shareholders	(i)	PAN	(ii)	No of shareholders	No of fully paid up equity shares held	(iv)	No of partly paid-up shares held	(v)	No of shares underlying Depository Receipts	(vi)	VII = (IV+V+VI)	Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2)	(ix)		Total as a % of total voting	(x)	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 equity shares held in dematerialised form
													No of voting rights Class	Total				As a % of	Total shares held (b)		As a % of	Total shares held (b)	

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)													

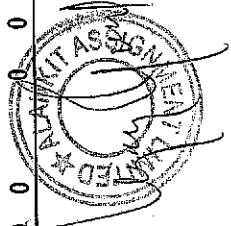


Table V - Statement showing details of significant beneficial owners (SBOs)

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

Quarter ended: 31.12.2020

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	Maailka 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.

