

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

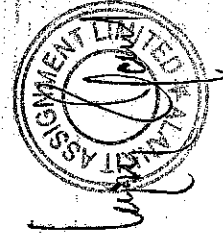
Format of Holding of Specified Securities

- 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 : 31-Dec-21

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

**Particulars**

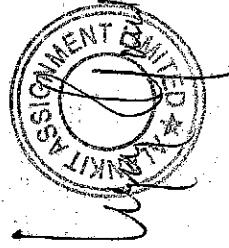
1. Whether the Listed Entity has issued any partly paid up shares ?	NO
2. Whether the Listed Entity has issued any Convertible Securities or Warrants ?	NO
3. Whether the Listed Entity has any shares against which Depository receipts are issued ?	NO
4. Whether the Listed Entity has any shares in locked-in ?	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: 31.12.2021**  
**Face Value 10.00**

(i) Category	(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	(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 securities (including	(xi) 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
								Class	Class	Total			As a % of Total	As a % of Total	No (a)	As a % of Total shares held (b)	
A.	Promoter & Promoter Group	8	288404	0	0	288404	69.98	0	288404	0	69.98	0	0	0	0	288404	
B.	Public	181	123726	0	0	123726	30.02	0	123726	0	30.02	0	0	0	0	288404	
C.	Non Promoter - Non Public	0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0	288404	
C1	Shares underlying DRs	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	288404	
C2	Shares held by Employee Trusts	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	288404	
	<b>Total</b>	<b>189</b>	<b>412130</b>	<b>0</b>	<b>0</b>	<b>412130</b>	<b>100.00</b>	<b>0</b>	<b>412130</b>	<b>0</b>	<b>100.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>288904</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: 31.12.2021**  
**Face Value 10.00**

Category and Name of the Shareholders	(i)	(ii)	(iii)	(iv)	(v)	(vi)	Total No of shares held (IV+V+VI)	(viii)	(ix)			(x)	Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share)	(xii)		(xiii)	(xiv)
									No of shares underlying Depository Receipts	No of fully paid up equity shares held	No of partly paid-up shares held			No of shares underlying Depository Receipts	No of states underlying securities (including warrants)		
PAN	(i)	(ii)	(iii)	(iv)	(v)	(vi)	Total No of shares held (IV+V+VI)	(viii)	(ix)			(x)	Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share)	(xii)		(xiii)	(xiv)
									No of shares underlying Depository Receipts	No of fully paid up equity shares held	No of partly paid-up shares held			No of states underlying securities (including warrants)	Shareholding as a % of convertible securities assuming full conversion (as a % of diluted share)		
1 Indian																	
(a) Individuals/ HUF																	
a) RAKESH HIMATSINGKA		AARPH8054L	1	20100	0	0	20100	4.88	20100	0	20100	4.88	0	0	0	0.00	20100
b) ANITA HIMATSINGKA		AATPH7918M	1	100	0	0	100	0.02	100	0	100	0.02	0	0	0	0.00	100
c) MAALIKA HIMATSINGKA		AASPH3214R	1	12500	0	0	12500	3.03	12500	0	12500	3.03	0	0	0	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	63092
g) RAKESH KR. SHAURYA VEER (HUF)		AADPH9607B	1	23800	0	0	23800	5.77	23800	0	23800	5.77	0	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	64138	15.56	64138	0	64138	15.56	0	0	0	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	74104
c) Burlington Investments Pvt. Ltd.		AABCB0767F	1	30570	0	0	30570	7.42	30570	0	30570	7.42	0	0	0	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>0.00</b>	<b>288404</b>
2 Foreign																	
(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>0.00</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>288404</b>
(A) = (A)(1) + (A)(2)			<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>288404</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

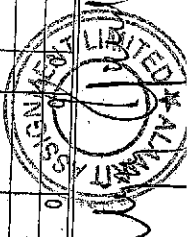


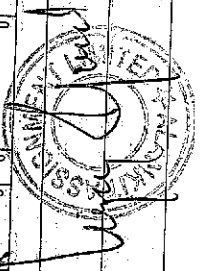
TABLE III : Statement showing Shareholding Pattern of Public shareholder

Name of the Company: Tower Investment & Trading Co. Ltd.  
 Quarter ended: 31.12.2021  
 Face Value 10.00

Category and Name of the Shareholders	PAN	(iii)	(iv)	(v)	(vi)	VII = (IV+V+VI)	Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2)	(ix)			(x)	XI total shareholding as a % of convertible securities assuming full conversion (as a % of diluted share capital)	(xii)	(xiii)	(xiv)					
								Number of Voting Rights held in each class of securities		Total as a % of total voting rights						No of shares underlying convertible securities (including warrants)	No of shares underly- ing 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
								Class X	Class Y											
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)																				
(ii) Sub-Total: (B)(1)																				
2 Central/State Government/ President of India																				
(i) Sub-Total: (B)(2)																				
3 Non-Institutions																				
(i) Individual shareholders holding nominal share capital up to Rs 2 lakhs																				
(ii) Individual shareholders holding nominal share capital in excess of Rs 2 lakhs																				
(b) NBFCs registered with RBI																				
(c) Employee Trusts																				
(d) Overseas Depositories																				
(e) Any other																				
Bodies Corporate																				
Non Resident Indian																				
Investor Education & Protection Fund Trust																				
(iii) Sub-Total: (B)(3)																				
Total Public Shareholding																				
(B) = (B)(1)+(B)(2)+(B)(3)																				

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: 31.12.2021**  
**Face Value 10.00**

1	(a)	(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)	(ix)	(x)	(xi)	(xii)		(xiii)		(xiv)						
													No of shares held	of (A+B+C2)	held in each class of securities	outstanding convertible securities (including warrants)		Total Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital)	Total No of Locked in shares	No of shares pledged or otherwise encumbered	Number of equity shares held in dematerialised form		
2	(a)	Employee Benefit Trust (under SEBI Share based employee Benefit) Regulations, 2014	No of voting rights		Total as a % of total voting	No of shares underlying securities	Shareholding % calculated as per SCRR 1957 As a % of (A+B+C2)	VII = (IV+V+VI)	No of shares held	No of shares underlying Depository Receipts	No of shares held	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)	No of shares underlying securities	Total Shareholding as a % assuming full conversion of convertible securities (as a % of diluted share capital)	Total No of Locked in shares	No of shares pledged or otherwise encumbered	Number of equity shares held in dematerialised form		
			Class	Total																			
1	Custodian/DR Holder																						
2	Employee Benefit Trust (under SEBI Share based employee Benefit) Regulations, 2014																						
<b>Total non Promoter-non-Public Shareholding (C) = (C)(1) + (C)(2)</b>																							

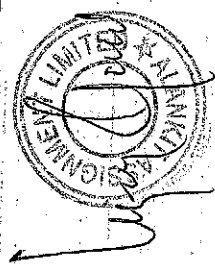


Table V - Statement showing details of significant beneficial owners (SBOs)  
 Name of the Company: Tower Investment & Trading Co. Ltd.  
 Quarter ended: 31.12.2021  
 Face Value 10.00

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.

