

## **CORPORATE GOVERNANCE REPORT FOR THE YEAR 2018-19**

### **I. COMPANY'S PHILOSOPHY ON CODE OF GOVERNANCE :**

Your Company is committed to good corporate governance and adheres to the tenets of integrity, accountability, fairness and transparency in all its operations. The Company continuously endeavors to improve upon these aspects on an ongoing basis and adopts innovative approaches for leveraging resources, converting opportunities into achievements through proper empowerment and motivation, fostering a healthy growth and development of human resources to take the Company forward. Your Company pursues growth by adopting best corporate practices and timely disclosures, which will enhance the long term value to all stakeholders and also inspires us to follow best practices which not only meet applicable legislation but go beyond in many areas of our functioning. We are committed to doing things the right way that is ethical and is in compliance with applicable legislation. Our code of corporate governance is an extension of our values and reflects our continued commitment to ethical business practices across our operations.

### **II. BOARD OF DIRECTORS**

- i. As on March 31, 2019, the Company has 4 directors. Of the 4 Directors, 1 (i.e. 25%) is executive director and 2 (i.e. 50.00 %) are independent directors and 1 Director (i.e 25.00%) is a non executive non independent director.
- ii. None of the directors on the board hold directorships in more than ten public Companies. Further, none of them is a member of more than ten committees or chairman of more than five committees across all the public companies in which he is a director. Necessary disclosures regarding committee positions in other public companies as on March 31, 2019 have been made by the directors. None of the directors are related to each other.
- iii. Independent Directors are non-executive directors as defined under Regulation 16(1)(b) of the SEBI Listing Regulations read with Section 149(6) of the Act. The maximum tenure of independent directors is in compliance with the Act. All the Independent Directors have confirmed that they meet the criteria as mentioned under Regulation 16(1)(b) of the SEBI Listing Regulations read with Section 149(6) of the Act.
- iv. The names and categories of the directors on the board, their attendance at board meetings held during the year and the number of directorships and committee chairmanships / memberships held by them in other public companies as on March 31, 2019 are given herein below. Other directorships do not include directorships of private limited companies, Section 8 companies and of companies incorporated outside India. Chairmanships / memberships of board committees shall include only audit committee and stakeholders' relationship committee.

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NAME OF THE DIRECTOR	CATEGORY	NUMBER OF BOARD MEETINGS DURING THE YEAR 2018-19		WHETHER ATTENDED LAST AGM HELD ON SEPTEMBER 25TH , 2017	NUMBER OF DIRECTORSHIPS IN OTHER PUBLIC COMPANIES		NUMBER OF COMMITTEE POSITIONS HELD IN OTHER PUBLIC COMPANIES	
		Held	Attended		Chairman	Member	Chairman	Member
Sagar Mal Nahata	Executive	6	2*	Yes	1	-	-	-
Sandip Kumar Bej	Independent Director	6	6	Yes	-	1	1	1
Sujit Kumar Panda	Non Executive	6	6	Yes	-	1	1	1
Anushri Pal	Independent Director	6	6	Yes	-	1	-	1

- Resigned on 02/07/2018 and reappointed on 02/05/2019

The Chairmanship of Committees are as on 31<sup>st</sup> March, 2019

- v. Six (6) board meetings were held during the year and the gap between two meetings did not exceed one hundred twenty days. The dates on which the said meetings were held:  
30<sup>th</sup> May, 2018; 30<sup>th</sup> June, 2018; 14<sup>th</sup> August, 2018; 14<sup>th</sup> November,2018; 14<sup>th</sup> February, 2019 & 30<sup>th</sup> March, 2019.

The necessary quorum was present for all the meetings.

During the year 2018-19, information as mentioned in Schedule II Part A of the SEBI Listing Regulations, has been placed before the Board for its consideration.

- vi. During the year under review, the Independent Directors met on March 31, 2019, inter alia, to discuss:
- Evaluation of performance of Non-Independent Directors and the Board of Directors as a whole;
  - Evaluation of performance of the Chairman of the Company, taking into account the views of the Executive and Non-Executive Directors;
  - Evaluation of the quality, content and timelines of flow of information between the Management and the Board that is necessary for the Board to effectively and reasonably perform its duties. All the Independent Directors were present for this Meeting.
- vii. The Board periodically reviews compliance reports of all laws applicable to the Company, prepared by the Company.

**III COMMITTEES OF THE BOARD**

**A. AUDIT COMMITTEE**

1. The audit committee of the Company is constituted in line with the provisions of Regulation 18 of SEBI Listing Regulations, read with Section 177 of the Act.
2. The terms of reference of the audit committee are broadly as under:
  - a. Oversight of the Company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible.
  - b. Recommending the appointment and removal of external auditor, fixation of audit fee and also approval for payment for any other services.
  - c. Reviewing with management the annual financial statements before submission to the Board, focusing primarily on:
    - i. Major accounting entries based on exercise of judgment by management;
    - ii. Qualifications in draft audit report;
    - iii. Significant adjustments arising out of audit; and
    - iv. Disclosure of any related party transactions.
  - d. Reviewing with the management, performance of statutory and internal auditors, external and internal auditors, the adequacy of internal control systems, risk management systems.
  - e. Reviewing the adequacy of internal audit function including the structure of the internal audit department, reporting structure coverage and frequency of internal audit.
  - f. Discussion with internal auditors on any significant findings and follow up thereon.
  - g. Reviewing the findings of any internal investigations by the internal auditors and external consultants into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board.
  - h. Discussion with statutory auditors before the audit commences, nature and scope of audit as well as post audit discussions to ascertain any area of concern.
3. The previous annual general meeting (AGM) of the Company was held on September , 30<sup>TH</sup> , 2019 and was attended by Mr. Sandip Kumar Bej, Chairman of the audit committee.
4. The composition of the audit committee and the details of meetings attended by its members are given below:

NAME	CATEGORY	NUMBER OF MEETINGS DURING THE FINANCIAL YEAR 2018-19	
		HELD	ATTENDED
Sandip Kumar Bej	Chairman	4	4
Sujit Kumar Panda	Member	4	4
Anushri Pal	Member	4	3

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5. Four (4) audit committee meetings were held during the year and the gap between two meetings did not exceed four months. The dates on which the said meetings were held are as follows:  
30<sup>th</sup> May, 2018; 14<sup>th</sup> August,, 2018; 14<sup>th</sup> November, 2018; and 14<sup>th</sup> February, 2019.

The necessary quorum was present for all the meetings.

**B. NOMINATION AND REMUNERATION COMMITTEE**

- i. The nomination and remuneration committee of the Company is constituted in line with the provisions of Regulation 19 of SEBI Listing Regulations, read with Section 178 of the Act.
- ii. The broad terms of reference of the nomination and Remuneration Committee are as under:
  - a. Assist the Board of Directors of the Company to:
    - i. determine, review and propose compensation principles and policy of the Company
    - ii. assess and review compensation plans recommended by the management;
    - iii. recommend the compensation packages of the Company's Executive Directors.
  - b. Identify persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, recommend to the Board of Directors their appointment and removal and shall carry out evaluation of every director's performance.
  - c. Approve and recommend matters relating to compensation by way of salary, perquisites, benefits, etc., to the Managing/Whole Time/ Executive Directors of the Company.
  - d. Formulate the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board of Directors a policy, relating to the remuneration for the directors including Independent directors, key managerial personnel and other employees. The policy shall, inter alia, cover termination payments to the Executive Committee members and other Senior Executives and oversight of the same by the Committee. The remuneration policy shall set guidelines for the Executive Committee/ Managing Director to approve remuneration to the Managing Committee members and their direct reports and other executives.
  - e. Review and recommend to the Board of Directors for approval any mandatory disclosures of the Management compensation.
  - f. Review and reassess the adequacy of the charter and perform annual self evaluation of the performance of the Committee.

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g. Carry out any other acts and deeds as may be delegated by the Board of Directors and deal with such other matters as may be prescribed under the Companies Act, the SEBI (LODR) Regulations and other statutory enactments.

h. Approve any share incentive or other plans for the employees of the Company.

The composition of the nomination and remuneration committee and the details of meetings attended by its members are given below:

NAME	CATEGORY	NUMBER OF MEETINGS DURING THE FINANCIAL YEAR 2018-19	
		HELD	ATTENDED
Sandip Kumar Bej	Chairman	3	3
Sujit Kumar Panda	Member	3	3
Anushri Pal	Member	3	3

During the year, Three (3) meetings of the nomination and remuneration committee were held on ; 14<sup>th</sup> August, 2018, 14<sup>th</sup> November, 2018 & 30<sup>th</sup> March, 2019

- i. The Company does not have any employee stock option scheme.
- ii. Remuneration policy:

Remuneration policy in the Company is designed to create a high performance culture. It enables the Company to attract, retain and motivate employees to achieve results. Our business model promotes customer centricity and requires employee mobility to address project needs. The remuneration policy supports such mobility through pay models that are compliant to local regulations. Annual increments are decided by the nomination and remuneration committee (NRC) within the salary scale approved by the members of the Company and are effective April 1 each year.

NRC decides on the commission payable to the managing director and the executive directors out of the profits for the financial year and within the ceilings prescribed under the Act based on the performance of the Company as well as that of the managing director and each executive director.

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During the year 2018-19, the Company has not paid sitting fees to its non-executive directors for attending meetings of the board and meetings of committees of the board.

- iii. Details of commission and sitting fees for the year ended March 31, 2019

No commission and sitting fees was paid to any Director for the year ended March 31, 2019

- iv. Details of equity shares of the Company held by the directors as on March 31, 2019 are given below:

<b>NAME</b>	<b>NUMBER OF EQUITY SHARES</b>
SAGAR MAL NAHATA	25275000
SAGAR MAL NAHATA (HUF)	12045000

- v. DETAILS OF REMUNERATION PAID TO DIRECTORS FOR THE YEAR ENDED MARCH 31, 2019

- NON EXECUTIVE DIRECTORS - NIL
- EXECUTIVE DIRECTORS

PARTICULARS	MR. Sagarmal Nahata
TERMS OF APPOINTMENT	2 YRS
SALARY	4,00,000
SITTING FEES	NIL
MINIMUM REMUNERATION	-
NOTICE PERIOD OF SEVERANCE	15 days

**PERFORMANCE EVALUATION**

Pursuant to the provisions of the Companies Act, 2013 and Regulations of the new Listing Agreement, the Board has carried out the annual performance evaluation of its own performance, the Directors individually as well as the evaluation of the working of its Board Committees. A structured questionnaire was prepared after circulating the draft forms, covering various aspects of the Board's functioning such as adequacy of the composition of the Board and its Committees, Board culture, execution and performance of specific duties, obligations and governance. The performance evaluation of the Chairman and Managing Director and the Non-Independent Directors was carried out by the Independent Directors, The Directors express their satisfaction with the evaluation process

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**C. STAKEHOLDERS' RELATIONSHIP COMMITTEE :**

- i. The stakeholders' relationship committee is constituted in line with the provisions of Regulation 20 of SEBI Listing Regulations read with section 178 of the Act.
- ii. The composition of the Stakeholders' Relationship Committee and the details of meetings attended by its members are given below

NAME	CATEGORY	NUMBER OF MEETINGS DURING THE FINANCIAL YEAR 2018-19	
		HELD	ATTENDED
Sujit Kumar Panda	Chairman	4	4
Sandip Kumar Bej	Member	4	4
Anushri Pal	Member	4	3

During the year, Four (4) meetings of the Stakeholders' Relationship committee were held on 30<sup>th</sup> May, 2018 ; 14<sup>th</sup> August, 2018; 14<sup>th</sup> November, 2018; and 14<sup>th</sup> February, 2019.

- iii The Board has clearly defined the terms of reference for this committee which generally meets once Quarterly. The Committee looks into the matters of shareholders :
- a. approval of transfer of shares/debentures and issue of duplicate/split/consolidation/sub-division of share/ debenture certificates
  - b. opening/modification of operation and closing of bank accounts;
  - c. grant of special/general Power of Attorney in favour of employees of the Company from time to time in connection with the conduct of the business of the Company particularly with Government and Quasi-Government Institutions
  - d. to fix record date/book closure of share/debenture transfer book of the Company from time to time; to appoint representatives to attend the General Meeting of other companies in which the Company is holding shares
  - e. to change the signatories for availment of various facility from Banks/Financial Institutions;
  - f. to grant authority to execute and sign foreign exchange contracts and derivative transactions;
  - g. to carry out any other duties that may be delegated to the Committee by the Board of Directors from time-to-time.

viii. Name, designation and address of Compliance Officer:

Mr. SUJIT KUMAR PANDA

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14, N.S. ROAD,  
2<sup>ND</sup> FLOOR,  
KOLKATA-700001  
PH : 033-40055190  
FAX : NIL  
EMAIL : SMN1098@REDIFFMAIL.COM

ix. Details of investor complaints received and redressed during the year 2018-19 are as follows:

<b>OPENING BALANCE</b>	<b>RECEIVED DURING THE YEAR</b>	<b>RESOLVED DURING THE YEAR</b>	<b>CLOSING BALANCE</b>
NIL	NIL	NIL	NIL

The above table includes Complaints received from SEBI SCORES by the Company.

Complaints and other correspondence are normally attended to within seven working days except where constrained by disputes or legal impediments, No investor grievances remained unattended/pending for more than thirty days as on March 31, 2019.

The Secretarial Department of the Company and the Registrar and Share Transfer Agent NICHE TECHNOLOGIES PVT LTD attend to all grievances of the shareholders received directly or through SEBI, Stock Exchanges, Ministry of Corporate Affairs, Registrar of Companies, etc. The Minutes of the Stakeholders Relationship Committee Meetings are circulated to the Board and noted by the Board of Directors at the Board Meetings.

**AFFIRMATIONS AND DISCLOSURES**  
**COMPLIANCE WITH GOVERNANCE FRAMEWORK**

The Company is in compliance with all mandatory requirements of Regulations of the new Listing Agreement

**RELATED PARTY TRANSACTIONS**

All transactions entered into with the Related Parties as defined under the Companies Act, 2013 and regulations of the new Listing Agreement during the financial year were in the ordinary course of business and on arm's length basis and do not attract the provisions of Section 188 of the Companies Act, 2013. There were no materially significant transactions with related parties during the financial year. Related party transactions have been disclosed under the notes forming part of the financial statements in accordance with Account Standard AS – 18 . A statement in summary form of transactions with related parties in ordinary course of business and arm's



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length basis is periodically placed before the Audit Committee for review and recommendation to the Board for their approval.

None of the transactions with related parties were in conflict with the interest of the Company. All the transactions are in the normal course of business and have no potential conflict with the interest of the Company at large and are carried out on an arm's length basis or fair value

**DETAIL OF NON-COMPLIANCE BY THE COMPANY, PENALTIES, AND STRICTURES IMPOSED ON THE COMPANY BY STOCK EXCHANGES OR SEBI OR ANY STATUTORY AUTHORITY, ON ANY MATTER RELATED TO CAPITAL MARKETS, DURING THE LAST THREE YEARS**

The Company has complied with all requirements of the Listing Agreements entered into with the Stock Exchanges as well as the regulations and guidelines of SEBI. A fine of Rs. 4600/- was imposed by the Bombay Stock Exchange for the matter related to the late filing of Shareholding Pattern for the quarter ended December 2016 and Rs. 7080/- was imposed by the Bombay Stock Exchange for the matter related to the late filing of Shareholding Pattern for Corporate Governance December 2018 during the last three years.

**WHISTLE BLOWER POLICY**

The Company has adopted a Whistle Blower Policy and has established the necessary vigil mechanism as defined under Regulation 22 of SEBI Listing Regulations for directors and employees to report concerns about unethical behavior. No person has been denied access to the Chairman of the audit committee.

**DISCLOSURE OF ACCOUNTING TREATMENT**

In the preparation of the financial statements, the Company has followed the Accounting Standards referred to in Section 133 of the Companies Act, 2013. The significant accounting policies which are consistently applied are set out in the Notes to the Financial Statements

**RISK MANAGEMENT BUSINESS**

Risk evaluation and management is an ongoing process within the Company. The assessment is periodically examined by the Board.

**NON-MANDATORY REQUIREMENTS**

Adoption of non-mandatory requirements of the Listing Agreement is being reviewed by the Board from time-to-time.

**RECONCILIATION OF SHARE CAPITAL AUDIT:**

A qualified practicing Company Secretary carried out a share capital audit to reconcile the total admitted equity share capital with the national securities depository limited (NSDL) and the Central Depository Services (India) Limited (CDSL) and the total issued and listed equity share capital. The audit report confirms that the total issued / paid-up capital is in agreement with the total number of

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shares in physical form and the total number of dematerialized shares held with NSDL and CDSL.

**CODE OF CONDUCT**

The members of the board and senior management personnel have affirmed the compliance with the Code applicable to them during the year ended March 31, 2019. The Annual Report of the Company contains a Certificate by the CEO / Managing Director in terms of the SEBI listing agreement based on the compliance declarations received from Independent Directors, Non-Executive Directors and Senior Management.

**SHARE TRANSFER SYSTEM:**

100% of the equity shares of the Company are in electronic form. Transfers of these shares are done through the depositories with no involvement of the Company. As regards transfer of shares held in physical form the transfer documents can be lodged with the Company at its Registered office or with Registrar and Transfer Agent .

**DEMATERIALISATION OF SHARES AND LIQUIDITY:**

The Company's shares are also traded in dematerialized form. Equity shares of the Company representing 100% of the Company's equity share capital are dematerialised as on March 31, 2019.

Under the depository system, the international securities identification number (ISIN) allotted to the Company's shares is **INE909D01026**.

**OUTSTANDING GDRS / ADRS / WARRANTS OR ANY CONVERTIBLE INSTRUMENTS, CONVERSION DATE AND LIKELY IMPACT ON EQUITY:**

The Company has not issued any GDRs / ADRs / Warrants or any convertible instruments in the past and hence as on March 31, 2019, the Company does not have any outstanding GDRs / ADRs / Warrants or any convertible instruments.

**EQUITY SHARES IN THE SUSPENSE ACCOUNT:**

There are no equity shares in suspense account as on 31<sup>ST</sup> March , 2019

**TRANSFER OF UNCLAIMED / UNPAID AMOUNTS TO THE INVESTOR EDUCATION AND PROTECTION FUND (IEPF):**

Pursuant to applicable sections of the Companies Act, 2013 and other applicable provisions, if any, of the Act, all unclaimed / unpaid dividend, application money, debenture interest and interest on deposits as well as the principal amount of debentures and deposits, as applicable, remaining unclaimed / unpaid for a period of seven years from the date they became due for payment, in relation to the Company have been transferred to the IEPF established by the Central Government.

**ADDRESS FOR CORRESPONDENCE:**  
**SHARP INVESTMENTS LTD**

**SHARP INVESTMENTS LIMITED**  
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**14, N.S. Road,  
2<sup>ND</sup> FLOOR,  
Kolkata – 700 001.  
Email: SMN1098@REDIFFMAIL.COM**

**COMPLIANCE CERTIFICATE**

Compliance Certificate on Corporate Governance from the Auditors of the Company is annexed with this Report .

**GENERAL BODY MEETINGS**

The date and time of Company's Annual General Meetings during the last three years are as follows:

<b>AGM for the Financial Year</b>	<b>Date</b>	<b>Time</b>	<b>Venue for all the three AGMs</b>
2015-2016	29.09.2016	10.30 AM	Sardarshahr Prarishad, 11, Dr. Rajendra Prasad Sarani, 5th Floor, Kolkata - 700001
2016-2017	25.09.2017	10.30 AM	Sardarshahr Prarishad, 11, Dr. Rajendra Prasad Sarani, 5th Floor, Kolkata - 700001
2017-2018	28.09.2018	10.00 AM	Sardarshahr Prarishad, 11, Dr. Rajendra Prasad Sarani, 5th Floor, Kolkata - 700001

No extra-ordinary general meeting of the shareholders was held during the year.

None of the Resolution proposed at the Annual General Meeting held was required to be passed by postal ballot

**GENERAL SHAREHOLDERS INFORMATION**

Annual General Meeting	
Date and Time	: 30th September, 2019 at 10.00 A.M
Venue	: Sardarshahr Parishad, 11, Dr. Rajendra Prasad Sarani, 5 <sup>th</sup> Floor, Kolkata - 700001
Financial Calendar (Tentative) for the Financial Year 2018-2019	: 1 <sup>st</sup> April, 2018 to 31 <sup>st</sup> March, 2019 First Quarter Results 2nd week of August, 2018 Second Quarter Results 2nd week of November,

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	2018 Third Quarter Results 2nd week of February, 2019 Fourth Quarter Results 4 <sup>th</sup> week of May, 2019
Date of Book Closure	: 24 <sup>th</sup> September, 2019 to 30 <sup>th</sup> September, 2019 (both days inclusive)
Dividend payment date	: No dividend is being recommended
Listing on stock exchange	: The Calcutta Stock Exchange Ltd. Bombay Stock Exchange Limited.
The Company has paid listing fees as applicable to the stock exchange.	
Annual Issuer fees for the year 2018-19 was paid to NSDL and CDSL on receipt of the invoices.	

The ISIN Number of the Company on both NSDL and CDSL is **INE909D01026**

Total No. of Shares dematerialized up to 31.03.2019 is 2,42,09,7500.

**MARKET PRICE DATA**

**Share price Data High/Low and Volume during each month of 2018-19 at BSE & CSE**

**Company :Sharp Investments Ltd 538212**

**Period:** Apr 2018 to Mar 2019

Month	Open	High	Low	Close	No. of Shares	No. of Trades	Total Turnover	Deliverable Quantity	% Deli. Qty to Traded Qty	* Spread	
										H-L	C-O
Apr 18	0.83	0.83	0.74	0.75	107618	101	82799	107618	100.00	0.09	-0.08
May 18	0.75	0.75	0.35	0.35	84099	93	36697	84099	100.00	0.40	-0.40
Jun 18	0.34	0.34	0.27	0.27	111062	91	34958	111062	100.00	0.07	-0.07
Jul 18	0.26	0.27	0.19	0.19	288095	95	57736	288095	100.00	0.08	-0.07
Aug 18	0.19	0.19	0.19	0.19	53518	49	10166	53518	100.00	0.00	0.00
Sep 18	0.19	0.19	0.19	0.19	35928	14	6825	35928	100.00	0.00	0.00
Oct 18	0.19	0.20	0.19	0.19	39848	26	7568	39848	100.00	0.01	0.00
Nov 18	0.19	0.19	0.19	0.19	22126	14	4202	22126	100.00	0.00	0.00
Dec 18	0.20	0.26	0.20	0.26	64186	43	14544	64186	100.00	0.06	0.05
Mar 19	0.25	0.25	0.25	0.25	2000	3	500	2000	100.00	0.00	0.00

All Prices in ₹

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**REGISTRAR & SHARE TRANSFER AGENT :**

M/s Niche Technologies Pvt. Ltd.  
 3A,Auckland Place, 7<sup>th</sup> Floor, R.No. - 7A & 7B  
 Kolkata - 700 017  
 PHONE- (033) 2280 -6616/17/18

**DISTRIBUTION OF SHAREHOLDINGS:**

SRL	No. of Shares		No. of Shareholder	% to Total	Total Shares	% to Total
1.	UPTO	500	673	46.9972	58992	0.0244
2.	501	1000	76	5.3073	65155	0.0269
3.	1001	5000	86	6.0056	246789	0.1019
4.	5001	10000	29	2.0251	216562	0.0895
5.	10001	50000	111	7.7514	4339631	1.7925
6.	50001	100000	181	12.6397	17434533	7.2015
7.	100001	And Above	276	19.2737	219735838	90.7634
		<b>TOTAL</b>	<b>1432</b>	<b>100.00</b>	<b>242097500</b>	<b>100.00</b>

Categories of equity shareholders as on March 31, 2019:

SL.NO	PARTICULARS	NO OF SHARES	% OF HOLDING
<b>A</b>	<b>PROMOTER HOLDING</b>		
	<b>a ) Individual</b>	49595000	<b>20.49</b>
	<b>b ) Bodies Corporate</b>	62041130	<b>25.62</b>
	<b>Total ( A )</b>	<b>111636130</b>	<b>46.11</b>
<b>B</b>	<b>PUBLIC SHARE HOLDING</b>	<b>130461370</b>	<b>53.89</b>

Top ten equity shareholders apart from promoter/promoter group of the Company as on March 31, 201:

Sl. No.	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Shareholding at the end of the year	
		No. of shares	% of total No. of shares	No. of shares	% of total No. of shares
1	MANI MARKETING & HOLDINGS PVT LTD	13538610	5.59	13538610	5.59
2	AMARJIT BANTHIA	1500000	0.62	1500000	0.62

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3	MAMTA BANTHIA	1500000	0.62	1500000	0.62
4	IL AND FS SECURITIES PVT LTD	1420000	0.59	1420000	0.59
5	RAJEEV AGGARWAL	1350000	0.56	1350000	0.56
6	SANJAY KR AGGARWAL	1350000	0.56	1350000	0.56
7	KAMAL AGGARWAL	1350000	0.56	1350000	0.56
8	KARVA AUTOMART LIMITED	1250005	0.51	1250005	0.51
9	BHAWNA AGGARWAL	1150000	0.48	1150000	0.48
10	ALKA DOSHI	1000000	0.41	1000000	0.41

**PERMANENT ACCOUNT NUMBER :**

The Securities and Exchange Board of India has mandated the submission of Permanent Account Number ( PAN ) by every participant in securities market . Members holding shares in electronic form are therefore requested to submit there PAN to the Depository Participants with whom they are maintaining their Demat accounts . Member holding shares in physical form can submit their PAN details to the Company / Registrar and Share Transfer Agent .