

CIN No. L65910DL1990PLC040705

Regd. Office: 4, MMTC/STC Market, Geetanjali, New Delhi-110017

Corp. Office: 315, Square One Mall, Saket, District Centre, New Delhi-110017

Phone No: 011-42181244, Email ID: genesis599@gmail.com, Website: [www.genesisfinance.net](http://www.genesisfinance.net)

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Date: 28<sup>th</sup> February, 2022

To,

The Manager,

Metropolitan Stock Exchange of India Limited

Vibgyor Towers, 4<sup>th</sup> floor,

Plot No C 62, G - Block, Opp. Trident Hotel,

Bandra Kurla Complex, Bandra (E),

Mumbai – 400098, India.

**Scrip Symbol: GENESISFIN**

**Subject: Outcome of meeting of the Board of Directors of Genesis Finance Company Limited (“Company”) held on Monday, February 28, 2022 in accordance with Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“SEBI Listing Regulations”)**

Dear Sir/Madam,

This is with reference to the captioned subject and in continuation of our letter dated 23<sup>rd</sup> February, 2022 in relation to convening of a meeting of the Board of Directors (“Board”) of the Company on Monday, 28<sup>th</sup> February, 2022.

As mentioned earlier, the Initial Public Announcement dated February 09, 2022 received from Mr. Naresh Garg, along with other Promoters and Promoter Group persons / entities, (hereinafter known as “Acquirer(s)”) of Genesis Finance Company Limited (“the Company”) in accordance with Regulation 8 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (“SEBI Delisting Regulations”), *inter alia* expressing the intention to voluntary delist the equity shares of the Company (“Initial Public Announcement”) to initiate the process and to express their intention to:



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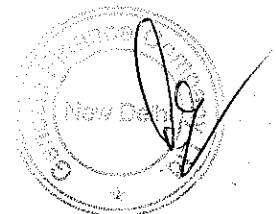
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- a) acquire all Equity Shares that are held by public shareholders (as defined under the SEBI Delisting Regulations); and
- b) consequently voluntarily delist the Equity Shares from the stock exchange where the Equity Shares are presently listed i.e., Metropolitan Stock Exchange of India Limited ("MSEI"), by making a delisting offer in accordance with the SEBI Delisting Regulations ("**Delisting Proposal**").

This is to inform you that the Board in its meeting held today (i.e., Monday, 28<sup>th</sup> February, 2022) took the following decisions:

- a) The due diligence report dated 28<sup>th</sup> February, 2022 ("Report") submitted by M/s RMG & Associates, Practicing Company Secretaries, a Peer Review Company Secretaries firm, in terms of Regulation 10(3) of SEBI Delisting Regulations, was taken on record by the Board. Please find enclosed herewith due diligence report.
- b) The Delisting Proposal was approved in accordance with Regulation 10 of the SEBI Delisting Regulations, after discussing and considering various factors including the Report and recommended the proposal to voluntarily delist the equity shares of the Company from the Metropolitan Stock Exchange of India Limited for approval of shareholders;
- c) The Board in accordance with Regulation 10(4) of the SEBI Delisting Regulations, certified that:
  - (i) The Company is in compliance with the applicable provisions of securities laws;
  - (ii) Acquirer is in compliance with the applicable provisions of securities laws in terms of the report including compliance with Regulation 4(5) of the SEBI Delisting Regulations; and
  - (iii) The Delisting Proposal is in the interest of the shareholders of the Company.



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- d) The Board approved the notice of postal ballot and explanatory statement thereto to seek approval of shareholders in accordance with Regulation 11 of the SEBI Delisting Regulations and in accordance with the provisions of Section 110 of the Companies Act, 2013 read with Rule 22 of the Companies (Management and Administration) Rules, 2014 and other applicable laws;
- e) M/s A Upadhyaya & Associates, Practicing Company Secretaries, has been appointed as the scrutinizer in terms of the Companies Act, 2013, read with the Companies (Management and Administration) Rules, 2014, to conduct the process of the postal ballot in a fair and transparent manner;

The aforesaid meeting of the Board commenced at 04:00 P.M. and concluded at 06:30 P.M.

Kindly take the above information on your record.

Thanking you

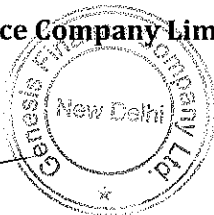
Yours truly,

For and on behalf of

**Genesis Finance Company Limited**



**Gopal Bisht**



**(Whole Time Director and Chief Financial Officer)**

**DIN:** 00597160

**Regt. Office Add.:** 4 MMTC/STC Market,

Geetanjali, New Delhi-110017

**Encl:** Due Diligence Report



# RMG & ASSOCIATES

Company Secretaries

## DUE DILIGENCE REPORT

[Pursuant to Regulation 10(3) of the SEBI (Delisting of Equity Shares) Regulations, 2021]

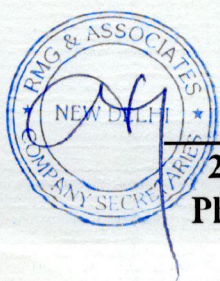
To,  
The Board of Directors  
Genesis Finance Company Limited  
(L65910DL1990PLC040705)  
4, MMTC/STC Market, Geetanjali,  
New Delhi - 110017

Dear Sir(s),

In terms of Regulation 10 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 (herein after called "**SEBI Delisting Regulations**"), we, M/s. RMG & Associates, Practicing Company Secretaries, a Peer Reviewed Practicing Company Secretaries (bearing Peer Review Certificate No. 734/2020), having been appointed by the Board of Directors of Genesis Finance Company Limited (the "**Company**"), having CIN : **L65910DL1990PLC040705**, having its registered office at **4, MMTC/STC Market, Geetanjali, New Delhi - 110017** and corporate office at 315, Third Floor Square One Mall, Saket, District Centre, New Delhi - 110 017, on February 14, 2022, to carry out the due diligence in accordance with Regulation 10(3) and other applicable provisions under SEBI Delisting Regulations and issue a Due Diligence Report (the "**DDR**").

### 1. Background

- (a) The Company has received an Initial Public Announcement dated February 09, 2022 ("**Initial Public Announcement**") from Naresh Garg, along with other Promoters and Promoter Group persons / entities, (hereinafter known as "**Acquirer(s)**"), of the Company, in accordance with Regulation 8 of the SEBI Delisting Regulations, *inter alia* expressing their intention to : (a) acquire 1,56,80,296 fully paid-up Equity Shares of the Company, having face value of Rs. 10/- each representing 33.80% of the paid up equity capital of the Company that are held by public shareholders (as defined under the SEBI Delisting Regulations and to be referred to as "Public Shareholders") either individually / collectively or together with other members of the Promoter Group or along with the persons acting in concert, as the case may be; and (b) consequently voluntarily delist the Equity Shares from the stock exchange where the Equity Shares of the Company are presently listed i.e., Metropolitan Stock Exchange of India Limited ("**MSEI**") (referred to as "**Stock Exchange**"), by making a delisting offer in accordance with the SEBI Delisting Regulations ("**Delisting Proposal**").



207, Suchet Chambers, 1224/5, Bank Street, Karol Bagh, New Delhi-110005  
Phone: 9212221110, 011 - 4504 2509; www.rmgcs.com; E-Mail: info@rmgcs.com



(b) The present structure of the capital of the Company is as under:

Particulars	Amount (Rs.)
<b>Authorized Share Capital</b>	
- 4,70,00,000 Equity Shares of face value Rs. 10/- each	47,00,00,000/-
<b>*Issued, Subscribed and Paid up Share Capital</b>	
- 4,63,97,120 Equity Shares of face value Rs. 10/- each	46,39,71,200/-

\*Entire Issued, Subscribed and Paid up Equity Share Capital is listed on the aforesaid stock exchange.

(c) Shareholding Pattern of the Company as on December 31, 2021 is as set forth below:

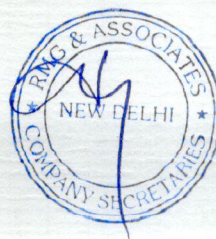
Category	No. of shares held	%age
Promoter and Promoter Group		
- Acquirer, who decides to make an offer for delisting of equity shares	35,48,480	7.65
- Other persons / entities forming part of the Promoter and Promoter Group along with persons acting in concert	2,71,68,344	58.55
Public shareholders	1,56,80,296	33.80
<b>Total</b>	<b>4,63,97,120</b>	<b>100.00</b>

## 2. Purpose and Requirement of the SEBI Delisting Regulations

2.1 In terms of Regulation 10(2) of the SEBI Delisting Regulations, the Board of Directors of the Company is required to:

- (a) obtain and furnish the details of buying, selling and dealing in the equity shares of the company by the acquirer or its related entities (including members of Promoter Group) during the period of two years prior to the date of board meeting held to consider the proposal for delisting, including the details of the top twenty-five shareholders for the said period and the details of off-market transactions of all such shareholders for a period of two years;
- (b) obtain and furnish such further details as may be sought by the Peer Review Company Secretary.

2.2 In terms of Regulation 10(3) of the SEBI Delisting Regulations, the Peer Review Company Secretary is required to carry out the due-diligence and submit a report to the Board of Directors of the Company.





2.3 This report is submitted in terms of Regulation 10 (3) of the SEBI Delisting Regulations to enable the Board of Directors of the Company to comply with the provisions of Regulations 10 of the SEBI Delisting Regulations and shall be used by the Company only for this purpose and for no other purpose whatsoever. The Company shall submit this report to the Board of Directors of the Company, the Promoter, the stock exchange, other regulatory authorities as may be required, any advisor(s) appointed by the Board of Directors specifically for the purpose of Delisting Proposal and the Manager to the Delisting Offer.

### **3. Methodology for Due Diligence**

3.1 For the purpose of our review and analysis of the details of buying, selling and dealing in the equity shares of the company by the acquirer or its related entities and top 25 public shareholders during the period of two years prior to the date of board meeting, we requested the Company to obtain the following:

- (a) details of the trading on the Stock Exchange in the Equity Shares of the Company for the period from February 13, 2020 till February 12, 2022, including the above referred period of two years, undertaken by the top 25 Public Shareholders and also the Promoters of the Company as on the date immediately preceding the date of the Board Meeting ("Review Period"), in accordance with Regulation 10(2)(a) and other relevant provisions of the SEBI Delisting Regulations. Trade Data here means details of trading in Equity Shares undertaken by such shareholders provided by the Stock Exchange for the Review Period and excludes data for off market trades.
- (b) weekly Beneficial Positions statements ("**Benpos**") as forwarded by the Company (sent by Registrar & Transfer Agent of the Company viz. Skyline Financial Services Private Limited ("**Registrar**" or "**RTA**") in relation to Top 25 Public Shareholders and Promoter for the period from February 13, 2020 till February 12, 2022, including the above referred period of two years for verifying the off-market trades undertaken by such shareholders

### **4. Documents, Information and Data sourced and relied**

In order to carry out our Due Diligence and to prepare this Report, we have reviewed, analyzed and relied on the following documents and information obtained from the Company, Registrar, Stock Exchange, as well as information available on the websites of Stock Exchange and in public domain:

4.1 Details of buying, selling and dealing in the equity shares of the Company on the Stock Exchange by Promoter and Promoter Group during the period from February 13, 2020 till February 12, 2022 annexed herewith as **Annexure I;**





- 4.2 Details of off market transactions by Promoter or Promoter Group during the period February 13, 2020 till February 12, 2022 annexed herewith as **Annexure II**;
- 4.3 Details of buying, selling and dealing in the equity shares of the Company on Stock Exchange by Top 25 shareholders during the period February 13, 2020 till February 12, 2022 annexed herewith as **Annexure III**;
- 4.4 Details of off-market transactions by Top 25 shareholders in the equity shares of the Company during the period from February 13, 2020 till February 12, 2022 as per the depositories record based on weekly Benpos annexed herewith as **Annexure IV**;
- 4.5 Representation letter dated February 22, 2022 from the Acquirer confirming that to the best of their knowledge, none of the public entities / persons mentioned in the list of top 25 (twenty-five) Public Shareholders is related to acquirer (including the Promoter and Promoter Group). ("Representation Letter from acquirer").
- 4.6 Based on the information available on the stock exchanges, We have considered the compliances / disclosures by the Promoter during the Review Period available on the websites of the Stock Exchange under Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 ("**SEBI SAST Regulations**") and the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**SEBI PIT Regulations**") and amendments thereto. However, we note that Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**") and Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 ("**SEBI SBEB Regulations**") are not applicable to the Promoter.
- 4.7 We have considered the compliances / disclosures by the Top 25 public shareholders during the Review Period available on the websites of the Stock Exchange under SEBI SAST Regulations and amendments thereto. However, we note that SEBI LODR Regulations, SEBI SBEB Regulations and SEBI PIT Regulations need not be verified for the buying, selling and dealing in the equity shares of the Company by the Top 25 public shareholders.
- 4.8 For the purpose of verifying details in relation to the term "related entities of the acquirer" as specified in regulation 10(2)(a) of the SEBI Delisting Regulations, we have considered the definition of "Acquirer" given in Regulation 2(1)(b)(ii) of SEBI Delisting Regulations and other Promoters and Promoter Group persons / entities as given under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations,





2018 (SEBI ICDR Regulations). We have considered the name and shareholding of the Promoter to ensure that it does not appear in the Top 25 Public Shareholders.

4.9 We have also analysed the shareholding pattern filed by the Company with the Stock Exchange for the last two years beginning from the quarter ended December 31, 2019 to December 31, 2021.

## **5. Certification**

5.1 We hereby certify that, during the Review Period:

- a. The buying, selling and dealing in the equity shares of the company carried out by the Acquirer or its related entities and the top twenty-five shareholders is in compliance with the applicable provisions of securities laws;
- b. The Acquirer has not, directly or indirectly, -
  - (i) employed any device, scheme or artifice to defraud any shareholder or other person; or
  - (ii) engaged in any transaction or practice that operates as a fraud or deceit upon any shareholder or other person; or
  - (iii) engaged in any act or practice that is fraudulent, deceptive or manipulative in connection with delisting of Equity Shares of the Company sought or permitted or exit opportunity given or other acquisition of Equity Shares made under the SEBI Delisting Regulations.

## **6. Assumption & Limitation of Scope & Review:**

Representation letter dated February 22, 2022 from the Acquirer confirming that to the best of their knowledge none of the public entities/persons mentioned in the list of Top 25 (twenty-five) Public Shareholders is related to acquirer and other matters. (Representation Letter from acquirer")

- 6.1 Ensuring the authenticity of documents and information furnished is the responsibility of the Board of Directors of the Company.
- 6.2 This DDR is based on due diligence of documents/ information shared by the Company for our review. Our responsibility is to give report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion. Therefore, this due diligence shall not be construed as an investigation or forensic audit.
- 6.3 As per the Information furnished to us, the company is not required to transfer Shares to the Investor Protection and Education Fund, therefore the same had not been assessed for the purpose of this report.





- 6.4 Various concepts viz. defraud, deceit, fraudulent, deceptive, manipulative is used in the SEBI Delisting Regulations. However, parameters / methodology for determining the same are not prescribed therein. By reading these terminologies, it can be construed that the Acquirer shall not directly or indirectly cause any loss to the Public Shareholders by adopting any malpractice.
- 6.5 Based on publicly available information, we have checked whether the Acquirer or the Company has common registered office or directorship. We do not have any negative observation.
- 6.6 We are not expressing any opinion on the Floor price and / or the price at which the shares would ultimately be delisted. We have assumed that the Company / Acquirer would comply with the applicable provisions related to floor price. Further, we are not an investment adviser or tax advisor or a broker / dealer. This report should not be construed as investment / disinvestment advise.
- 6.7 This DDR is solely for the intended purpose of delisting of Equity Shares of the Company and for your information and it is not to be used, circulated, quoted or otherwise referred to for any purpose other than Delisting purposes and as required under the SEBI Delisting Regulations.

**For RMG & Associates**  
**Company Secretaries**  
**Peer Review No. 734/2020**  
**Firm Registration No. P2001DE016100**



*Manish Gupta*  
28/2/2022

**Place: New Delhi**

**Date: 28-02-2022**

**UDIN: F005123C002735169**

**CS Manish Gupta**  
**Partner**

**FCS: 5123; C.P. No.: 4095**



**Annexure I**

Details of buying, selling and dealing in the equity shares of the Company on Stock Exchange by Promoter and Promoter Group during the period from February 13, 2020 to February 12, 2022

Name of the Promoter / Promoter Group	Folio Nos / DP IDs in which shares held	Shareholding as on February 13, 2020		MSEI		Shareholding as on February 12, 2022	
		No. of shares	%age	Buy	Sell	No. of shares	%age
Bhagwati Devi	IN30340310004113	45,06,880	9.71	-	-	45,06,880	9.71
Sangeeta Garg	1204980000136502	44,80,560	9.66	-	-	44,80,560	9.66
Prateet Garg	1204980000136517	35,73,048	7.70	-	-	35,73,048	7.70
Naresh Garg	1204980000136686	35,48,480	7.65	-	-	35,48,480	7.65
Sahil Garg	1204980000200541	28,30,704	6.10	-	-	28,30,704	6.10
Kapil Berera	IN30114311426449	52,000	0.11	-	-	52,000	0.11
Genesis Dream Merchants Private Limited*	IN30177413272826	78,53,728	16.93	-	-	1,09,25,152	23.55
Genesis Holdings Private Limited	1201910102065222	10,00,000	2.16	-	-	-	-
Sopan Real Estates Private Limited	1204980000224451	8,00,000	1.72	-	-	8,00,000	1.72

\*Pursuant to Hon'ble NCLT's order of arrangement under section 230-232 of the Companies Act, 2013, dated June 22, 2020, Genesis Holdings Private Limited and Kaizen Realtors Private Limited were amalgamated with Genesis Dream Merchants Private Limited. On February 05, 2021, 10,00,000 equity shares held by Genesis Holdings Private Limited and 20,71,424 equity shares held Kaizen Realtors Private Limited were transferred to Genesis Dream Merchants Private Limited.





**Annexure II**

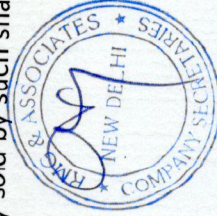
**Details of off market transactions by Promoter or Promoter Group during the period from February 13, 2020 to February 12, 2022 as per the depositories record based on weekly benpos**

Name of the Promoter/ Promoter Group	Folio Nos / DP IDs in which shares held	Shareholding as on February 13, 2020		Buy / Credit in demat account	Sell / Debit in demat account	Shareholding as on February 12, 2022	
		No. of shares	%age			No. of shares	%age
Bhagwati Devi	IN30340310004113	45,06,880	9.71	-	-	45,06,880	9.71
Sangeeta Garg							
Prateet Garg	1204980000136502	44,80,560	9.66	-	-	44,80,560	9.66
Naresh Garg	1204980000136517	35,73,048	7.70	-	-	35,73,048	7.70
Sahil Garg	1204980000136686	35,48,480	7.65	-	-	35,48,480	7.65
Kapil Berera	1204980000200641	28,30,704	6.10	-	-	28,30,704	6.10
Genesis Dream Merchants Private Limited*	IN30114311426449 IN30177413272826	52,000	0.11	-	-	52,000	0.11
Genesis Holdings Private Limited	1201910102065222	78,53,728	16.93	30,71,424	-	1,09,25,152	23.55
Sopan Real Estates Private Limited	1204980000224451	10,00,000	2.16	-	(10,00,000)	-	-
<b>Total</b>		<b>8,00,000</b>	<b>1.72</b>	<b>-</b>	<b>-</b>	<b>8,00,000</b>	<b>1.72</b>
		<b>2,86,45,400</b>	<b>61.74</b>	<b>30,71,424</b>	<b>(10,00,000)</b>	<b>3,07,16,824</b>	<b>66.20</b>

\*Pursuant to Hon'ble NCLT's order of scheme of arrangement under section 230-232 of the Companies Act, 2013, dated June 22, 2020, Genesis Holdings Private Limited and Kaizen Realtors Private Limited were amalgamated with Genesis Dream Merchants Private Limited. On February 05, 2021, 10,00,000 equity shares held by Genesis Holdings Private Limited and 20,71,424 equity shares held Kaizen Realtors Private Limited were transferred to Genesis Dream Merchants Private Limited.

Note:

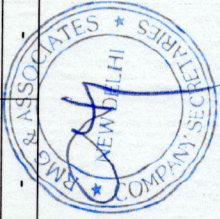
- The above summary is based on the debit / credit transactions in the records of the depositories (i.e. NSDL & CDSL) and may not reflect actual sale or purchase undertaken by such holder of equity shares in their demat account. The transfer of shares in the aforesaid demat accounts may also be on account of settlement obligation for the equity shares of the Company sold by such shareholders on the floor of the stock exchange and already covered in Annexure I of this Due Diligence Report.





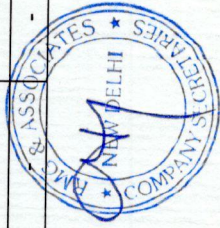
Details of buying, selling and dealing in the equity shares of the Company on Stock Exchange by top 25 shareholders during the period from February 13, 2020 to February 12, 2022

Sr. No.	Name of shareholder	Folio Nos / DP IDs in which shares held	Shareholding as on February 13, 2020		MSEI		Shareholding as on February 12, 2022	
			No. of shares	%age	Buy	Sell	No. of shares	%age
1	Shashi Bala Garg	782	42,47,680	9.16	-	-	42,47,680	9.16
2	Nirmala Devi	1204980000200700	27,92,000	6.02	-	-	27,92,000	6.02
3	Sharan Tayal	IN30340310003958	23,66,552	5.10	-	-	23,66,552	5.10
4	Vinod Kumar	1204980000204705	15,28,000	3.29	-	-	15,28,000	3.29
5	Vinod Tayal	IN30340310003940	14,04,784	3.03	-	-	14,04,784	3.03
6	Manju Kapoor	IN30021418092033/ IN30340310003966	11,60,000	2.50	-	-	11,60,000	2.50
7	Agrah Garg	1204980000241959	3,29,900	0.71	-	-	3,29,900	0.71
8	Sumer Datta	IN30068510559647	2,68,000	0.58	-	-	2,68,000	0.58
9	Manish Bakshi	IN30115125400316	2,43,200	0.52	-	-	2,43,200	0.52
10	Mayank Gupta	IN30340310010882	2,00,000	0.43	-	-	2,00,000	0.43
11	Sanchi Jain	743	1,80,700	0.39	-	-	1,80,700	0.39
12	Drouhn Garg	1204980000241963	1,78,100	0.38	-	-	1,78,100	0.38
13	Sarita Jain	744	1,70,700	0.37	-	-	1,70,700	0.37
14	Akshay Jain	727	1,50,700	0.32	-	-	1,50,700	0.32
15	Sunit Mathur	IN30340310010874/ 34	1,40,800	0.30	-	-	1,40,800	0.30
16	Rohit Chopra	IN30021420071246	80,000	0.17	-	-	80,000	0.17
17	Abhinav Dhawan	606	75,000	0.16	-	-	75,000	0.16
18	Jasdeep Singh Sahota	IN30340310007143	64,000	0.14	-	-	64,000	0.14
19	Satish Garg	706	9,580	0.02	-	-	9,580	0.02





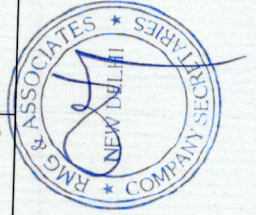
Sr. No.	Name of shareholder	Folio Nos / DP IDs in which shares held	Shareholding as on February 13, 2020		MSEI		Shareholding as on February 12, 2022	
			No. of shares	%age	Buy	Sell	No. of shares	%age
20	Madhu Mittal	707	8,290	0.02	-	-	8,290	0.02
21	Tarun Gupta	56	8,000	0.02	-	-	8,000	0.02
22	Tanisha Gupta	57	8,000	0.02	-	-	8,000	0.02
23	Sunil Kumar Mittal	698	7,760	0.02	-	-	7,760	0.02
24	Mahesh Garg	10	6,700	0.01	-	-	6,700	0.01
25	Kanav Kumar	704	5,000	0.01	-	-	5,000	0.01





Details of off-market transactions by top 25 shareholders in the equity shares of the Company during the period from February 13, 2020 to February 12, 2022 as per the depositories record based on weekly Benpos

Sr. No.	Name of shareholder	Folio Nos / DP IDs in which shares held	Shareholding as on February 13, 2020		Buy / Credit in demat account	Sell / Debit in demat account	Shareholding as on February 12, 2022	
			No. of shares	%age			No. of shares	%age
1	Shashi Bala Garg	782	42,47,680	9.16	-	-	42,47,680	9.16
2	Nirmala Devi	1204980000200700	27,92,000	6.02	-	-	27,92,000	6.02
3	Sharan Tayal	IN30340310003958	23,66,552	5.10	-	-	23,66,552	5.10
4	Vinod Kumar	1204980000204705/						
5	Vinod Tayal	579	15,28,000	3.29	-	-	15,28,000	3.29
6	Manju Kapoor	IN30340310003940	14,04,784	3.03	-	-	14,04,784	3.03
7	Agrah Garg	IN30021418092033/	11,60,000	2.50	-	-	11,60,000	2.50
8	Sumer Datta	IN30340310003966	3,29,900	0.71	-	-	3,29,900	0.71
9	Manish Bakshi	1204980000241959	2,68,000	0.58	-	-	2,68,000	0.58
10	Mayank Gupta	IN30115125400316	2,43,200	0.52	-	-	2,43,200	0.52
11	Sanchi Jain	IN30340310010882	2,00,000	0.43	-	-	2,00,000	0.43
12	Drouhn Garg	743	1,80,700	0.39	-	-	1,80,700	0.39
13	Sarita Jain	1204980000241963	1,78,100	0.38	-	-	1,78,100	0.38
14	Akshay Jain	744	1,70,700	0.37	-	-	1,70,700	0.37
15	Sunit Mathur	727	1,50,700	0.32	-	-	1,50,700	0.32
		IN30340310010874/						
16	Rohit Chopra	34	1,40,800	0.30	-	-	1,40,800	0.30
17	Abhinav Dhawan	IN30021420071246	80,000	0.17	-	-	80,000	0.17
18	Jasdeep Singh Sahota	606	75,000	0.16	-	-	75,000	0.16
		IN30340310007143	64,000	0.14	-	-	64,000	0.14





19	Satish Garg	706	9,580	0.02	-	-	9,580	0.02
20	Madhu Mittal	707	8,290	0.02	-	-	8,290	0.02
21	Tarun Gupta	56	8,000	0.02	-	-	8,000	0.02
22	Tanisha Gupta	57	8,000	0.02	-	-	8,000	0.02
23	Sunil Kumar Mittal	698	7,760	0.02	-	-	7,760	0.02
24	Mahesh Garg	10	6,700	0.01	-	-	6,700	0.01
25	Kanav Kumar	704	5,000	0.01	-	-	5,000	0.01

**Note:**

- The above summary is based on the debit / credit transactions in the records of the depositories (i.e. NSDL & CDSL) and may not reflect actual sale or purchase undertaken by such holder of equity shares in their demat account. The transfer of shares in the aforesaid demat accounts may also be on account of settlement obligation for the equity shares of the Company sold by such shareholders on the floor of the stock exchange and already covered in Annexure III of this Due Diligence Report.

