

Thambbi Modern Spinning Mills Limited

CIN : L17111TZ1977PLC000776



Dated: August 02, 2023

To,

**Listing Department,
BSE Limited,
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai- 400001**

Scrip Code: 514484

Dear Sir/Madam,

Sub: Disclosure under Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended - in relation to the outcome of meeting of Board of Directors of Thambbi Modern Spinning Mills Limited ("Company") held on August 2, 2023.

With reference to the above captioned subject matter and in continuation of our intimation dated **July 28, 2023**, we wish to inform that a meeting of the Board of Directors of the Company was held today i.e. on **August 2, 2023**. The following matters were discussed:

1. The Board considered and took on record (i) the Due-Diligence Report dated August 2, 2023 submitted by R. Sridharan & Associates, a Peer Review Company Secretary firm ("**Report**") (FCS No. 4775, CP No. 3239, PR No. 657/2020) in accordance with Regulation 10(3) of the Delisting Regulations annexed herewith as **Annexure A** (ii) share capital audit report dated August 2, 2023 submitted by R. Sridharan & Associates, a Peer Review Company Secretary firm, prepared in accordance with Regulation 76 of the Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 read with Regulation 12(2) of the Delisting Regulations, in respect to the equity shares proposed to be delisted, covering a period of 6 months prior to the date of the meeting of the Board ("**Audit Report**") annexed herewith as **Annexure B**.
2. The Board took on record the letter dated August 2, 2023 received from the Promoter Acquirer informing the Company that:
 - a. The floor price for the Delisting offer is Rs. 16.18/- per Equity Share, which is determined in accordance with regulation 20(2) of the SEBI Delisting Regulations read with Regulation 8 of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. In support of the aforesaid, the letter was accompanied by a valuation report dated 2nd August, 2023 issued by Mr. M Rajapandian (IBBI Registration No. IBBI/RV/05/2019/10983) and;
 - b. The indicative price for the delisting offer is Rs. 20.00/- per share.
3. After discussing and considering various factors of the Due Diligence Report and the information available with the Company, the Board of Directors has:
 - a. Subject to approval from shareholders, approved the Delisting Proposal in accordance with regulation 10(1) of the Delisting Regulations;
 - b. Pursuant to Regulation 10(4) of Delisting Regulations, certified the following:
 - i. That the Company is in compliance with the applicable provisions of the Securities Law;

Thambbi Modern Spinning Mills Limited

CIN : L17111TZ1977PLC000776



- ii. That the Promoter Acquirer and its related entities are in compliance with the applicable provisions of securities laws in terms of the Report including compliance with sub-regulation (5) of Regulation 4 of the Delisting Regulations; and
 - iii. That the delisting is in the interest of the shareholders.
- c. Consented to seek necessary approval of the shareholders of the Company for the Delisting Proposal by way of postal ballot and in that regard, approved the draft notice of Postal Ballot and matters incidental thereto including appointment of Mr. R Sridharan of R. Sridharan & Associates, Company Secretaries (FCS No. 4775, CP No. 3239, PR No. 657/2020) as Scrutinizer to conduct the process of postal ballot. The Postal Ballot Notice will be submitted in due course.

The Board meeting commenced at 5.00 PM and concluded at 6.30 PM

Request you to kindly take note of the same and acknowledge the receipt.

Thanking you,

Yours Faithfully,

For Thambbi Modern Spinning Mills Limited

M. Uma Maheshwari
Company Secretary

Encl: As above

**DUE DILIGENCE REPORT
FOR THAMBBI MODERN SPINNING MILLS LIMITED**

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

To

The Board of Directors,
 Thambbi Modern Spinning Mills Limited,
 Omalur Road, Jagir Ammpalayam,
 Salem - 636 302

In terms of Regulation 10 of the Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 ("**Delisting Regulations**"), We, R. Sridharan & Associates, Peer Reviewed Practicing Company Secretaries, have been appointed by the Board of Directors of Thambbi Modern Spinning Mills Limited, (hereinafter referred to as the "**Company**") having CIN:L17111TZ1977PLC000776 and having its registered office at Omalur Road, Jagir Ammapalayam, Salem, vide circular resolution dated 15th July 2023, to carry out the due diligence in accordance with Regulation 10(3) and other applicable provisions under the Delisting Regulations and issue a Due Diligence Report ("**DDR**").

Background:

1. In terms of Regulation 8 of the Delisting Regulations, an Initial Public Announcement dated 14th July 2023 ("**Initial Public Announcement**") was issued on behalf of Mr. Ramasamy Udayar Jagadeesan, the acquirer as defined under the Delisting Regulations ("**Acquirer**") *inter alia* expressing his intention to:
 - (a) Acquire 28,84,950 fully paid up equity shares of the Company, having a face value of INR 10 each, ("**Equity Shares**") representing 25.03% of the paid-up equity capital held by the public shareholders of the Company (as defined under the Delisting Regulations and to be referred to as "**Public Shareholders**"), either individually / collectively or together with other members of the Promoter Group, as the case may be; and
 - (b) Consequently voluntarily delist the Equity Shares from the Stock Exchange where the Equity Shares are presently listed namely, BSE Limited ("**Stock Exchange**") by making a delisting offer in accordance with the Delisting Regulations ("**Delisting Proposal**")





Company Secretaries

2. The present Capital structure including the details of the Authorised, Subscribed, Issued, Paid up and Listed Equity share Capital of the Company is placed at **Annexure I.**
3. Shareholding Pattern of the Company as on **01.08.2023** is placed at **Annexure II.**
4. The distribution of public shareholding as on **01.08.2023** is as per **Annexure III.**
5. The list of Top Twenty-Five shareholders (other than Acquirer) as on **01.08.2023** is placed at **Annexure IV.**

Verification

1. On the basis of the information received from/furnished by the Board of Directors of the Company, as required under sub-regulation 2 of Regulation 10 of the Delisting Regulations, for the purpose of carrying out the due diligence, we have examined the following:
 - (a) The details of buying, selling and dealing in the Equity Shares of the Company by the Acquirer or their related entities (including members of Promoter Group) during the period of two years prior to the date of Board Meeting i.e. 02.08.2023 held to consider the Delisting Proposal ("**Review Period**") including the details of the Top Twenty-Five shareholders, for the said period;
 - (b) Weekly Beneficial positions Statements ("Benpos") as forwarded by the Company [sent by Registrar & Transfer Agent of the Company, Cameo Corporate Services Limited ("Registrar" or "RTA")], in relation to Top Twenty-five Public Shareholders and members of Promoter Group for the period from 30.07.2021 to 01.08.2023
 - (c) List of Top Twenty-five Public Shareholders and Acquirers/ Promoter Group from RTA of the company as on 01.08.2023
 - (d) The details of off-market transactions of the aforesaid persons/ shareholders during the Review Period;

2. For the purpose of verifying applicability and compliance of securities laws, we have identified the following regulations and their applicability

Regulations	Acquirer and their related entities (including members of Promoter Group)	Top 25 Public Shareholders
The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI LODR)	Applicable/Not Applicable	Applicable/Not Applicable





Regulations) as amended from time to time		
The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (SEBI PIT Regulations) as amended from time to time	Applicable/Not Applicable	Applicable/Not Applicable*
The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (SEBI SAST Regulations) as amended from time to time	Applicable/Not Applicable	Applicable/Not Applicable
Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 as amended from time to time	Applicable/Not Applicable	Applicable/Not Applicable

**Applicable to the extent mentioned hereinafter*

Observation:

Basis review of the aforesaid information/ document, set out below is our analysis/ observations:

a) For Acquirer and their related entities:

i. During the Review Period, we did not notice any change in the shareholding of the Acquirer and their related entities, except as follows:

S.No.	Name of persons classified in Promoter/ Promoter Group	Share holding as on 30-07-2021	Date of dealing	Buy	Sell	Share holding as on 01-08-2023
1	R JAGADEESAN	3284995	18/01/2023	3820295*	-	7105290
2	MALATHI JAGADEESAN	568530	18/01/2023	500000*	-	1068530
3	J RAJALAKSHMI	256820	-	-	-	256820
4	J RAMKUMAR	209950	-	-	-	209950

**Pursuant to allotment of equity shares on Rights basis*





- ii. As on 01.08.2023, the Acquirer and their related entities holds hold 86,40,590 Equity shares, representing 74.97% paid up Equity share capital of the Company.

b) For Top Twenty-Five shareholders:

- i) During the Review Period, Top Twenty-Five Public Shareholders have overall (net) bought 19,11,275 Equity Shares of the Company

ii)

S.No.	Name of Top 25 Public Shareholders	Share holding as on 30-07-2021	Date of dealing	Buy	Sell	Share holding as on 01-08-2023
1	VIJAYARAGAVAN CHANDRASEKAR	0	17/02/2023	125000	-	
			24/02/2023	315000	-	440000
2	K. SUNDARESWARAN	0	27/08/2021	1000	-	
			03/03/2023	147000	-	
			24/03/2023	177588	-	
			21/04/2023	20000	-	
			26/05/2023	1000	-	
			30/06/2023	52000	-	398588
3	ISHWARI SUNDARESWARAN	0	21/04/2023	23642	-	
			28/04/2023	100000	-	
			26/05/2023	15000	-	
			02/06/2023	22580	-	
			30/06/2023	52552	-	
			14/07/2023	27000	-	240774
4	VIJAYALAKSHMI VIJAYARAGAVAN	0	03/03/2023	91372	-	
			17/03/2023	74000	-	
			28/04/2023	34734	-	200106
5	P RAJASEKARAN	5930	24/06/2022	25000	-	
			18/01/2023	98421*	-	
			24/02/2023	1000	-	
			24/03/2023	11652	-	
			07/04/2023	2800	-	
			14/04/2023	2455	-	
			21/04/2023	1919	-	
			28/04/2023	1100	-	
			05/05/2023	2400	-	
			12/05/2023	1570	-	
			19/05/2023	3100	-	
			02/06/2023	4544	-	
			16/06/2023	2436	-	
			23/06/2023	2031	-	





S.No.	Name of Top 25 Public Shareholders	Share holding as on 30-07-2021	Date of dealing	Buy	Sell	Share holding as on 01-08-2023
			30/06/2023	1000	-	
			07/07/2023	452	-	
			14/07/2023	1674	-	169484
6	RAJU AJIT BHANDARI	3217	27/01/2023	50000	-	
			21/07/2023	80000	-	133217
7	RAJU BHANDARI	117011	18/01/2023	140000*	-	
			27/01/2023	-	50000	
			21/07/2023	-	80000	127011
8	KRISHNAKUMAR RAMACHANDRAN	8617	03/09/2021	13607	-	
			24/06/2022	43000	-	
			18/01/2023	99500*	-	
			28/04/2023	-	100000	64724
9	S MOHANVEL	69	24/06/2022	13000	-	
			08/07/2022	12000	-	
			26/08/2022	14000	-	
			18/01/2023	124321*	-	
			24/02/2023	-	17810	
			03/03/2023	-	73000	
			02/06/2023	-	22580	
			21/07/2023	150	-	
			28/07/2023	7050	-	57200
10	SAKTHINATHAN AMSAVENI	0	15/07/2022	27000	-	
			09/12/2022	8000	-	
			18/01/2023	111373*	-	
			03/03/2023	-	74000	
			26/05/2023	-	16000	56373
11	KAMAL KUMAR GOYAL	0	08/04/2022	10673	-	
			18/01/2023	33962*	-	44635
12	S SUBRAMANIAN	0	26/08/2022	20000	-	
			18/01/2023	63642*	-	
			21/04/2023	-	43642	
			23/06/2023	200	-	
			14/07/2023	-	200	40000
13	MAHENDRA GIRIDHARLAL	8345	18/01/2023	26554*	-	34899
14	SHANMUGAM MOHANVEL	0	14/04/2023	600	-	
			21/04/2023	500	-	
			28/04/2023	800	-	
			05/05/2023	449	-	
			12/05/2023	1300	-	
			19/05/2023	3619	-	





S.No.	Name of Top 25 Public Shareholders	Share holding as on 30-07-2021	Date of dealing	Buy	Sell	Share holding as on 01-08-2023
			26/05/2023	1500	-	
			02/06/2023	650	-	
			09/06/2023	300	-	
			16/06/2023	700	-	
			23/06/2023	1000	-	
			30/06/2023	1600	-	
			07/07/2023	1486	-	
			14/07/2023	1300	-	
			21/07/2023	3230	-	
			28/07/2023	375	-	
			31/07/2023	200	-	19609
15	FATEMA HUSSAINI BHARMAL	18100		-	-	18100
16	SKYES & RAYS EQUITIES (I) LTD.	0	13/01/2023	2024	-	
			18/01/2023	4000*	-	
			20/01/2023	-	2899	
			27/01/2023	4026	-	
			03/02/2023	1000	-	
			10/02/2023	450	-	
			24/02/2023	657	-	
			24/03/2023	2576	-	
			31/03/2023	660	-	
			07/04/2023	100	-	
			14/04/2023	150	-	
			12/05/2023	310	-	
			19/05/2023	100	-	
			02/06/2023	1150	-	
			09/06/2023	100	-	
			16/06/2023	800	-	
			23/06/2023	10	-	
			07/07/2023	100	-	
			14/07/2023	230	-	
			31/07/2023	300	-	15844
17	SUBODH RAJARAM MANJREKAR	15100		-	-	15100
18	PUNJAB NATIONAL BANK	13800		-	-	13800
19	NAYAN S MANJREKAR	13700		-	-	13700
20	BAJAJ AUTO LIMITED	12700		-	-	12700
21	SUHAS S KULKARNI	12300		-	-	12300
22	BHARAT HARILAL SHAH	10179		-	-	10179
23	PODDAR AMALGAMATED HOLDINGS PVT LTD.	9200		-	-	9200
24	TARUN NARESH AHUJA	2500	18/01/2023	5000*	-	7500
25	RAJENDRAN VIJAYAKUMAR	0	26/05/2023	400	-	





S.No.	Name of Top 25 Public Shareholders	Share holding as on 30-07-2021	Date of dealing	Buy	Sell	Share holding as on 01-08-2023
			02/06/2023	2000	-	
			09/06/2023	1300	-	
			30/06/2023	1400	-	
			07/07/2023	500	-	
			14/07/2023	600	-	
			21/07/2023	700	-	
			28/07/2023	100	-	7000

***Pursuant to allotment of equity shares on Rights basis**

iii) The Acquirer has confirmed that neither of him nor his related entities or other members of the Promoter Group have any connections, direct or indirect, with the Top Twenty-Five Public Shareholders.

Certification:

We hereby certify that, during the Review Period:

- 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 except asset out below;

The Chief Financial Officer of the Company, Mr. P. Rajasekaran, designated person as per SEBI (PIT) Regulations, 2015, has violated the said regulations and 'The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' of the Company, by executing certain trades during the closure of trading window.

- The Acquirer has not, directly or indirectly, –
 - employed any device, scheme or artifice to defraud any shareholder or other person; or
 - engaged in any transaction or practice that operates as a fraud or deceit upon any shareholder or other person; or
 - 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 Delisting Regulations.

Assumption & Limitation of Scope & Review:

- Ensuring the authenticity of documents and information furnished is the responsibility of the Board of Directors of the Company.



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.
3. Various concepts viz. defraud, deceit, fraudulent, deceptive, manipulative are 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.

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.

From the above details, we can conclude that the Acquirer has not:

- (i) Employed any device, scheme or artifice to defraud any shareholder or other person;
 - (ii) Engaged in any transaction or practice that operates as a fraud or deceit upon any shareholder or other person; and
 - (iii) Engaged in any act or practice that is fraudulent, deceptive or manipulative.
4. 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.
 5. 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 Delisting Regulations.

PLACE : CHENNAI
DATE : 02ND AUGUST, 2023

For R.SRIDHARAN & ASSOCIATES
COMPANY SECRETARIES



CS R.SRIDHARAN
CP No. 3239
FCS No. 4775
PR NO.657/2020
UIN : S2003TN063400
UDIN: F004775E000723781



ANNEXURE I

CAPITAL STRUCTURE OF THE COMPANY AS ON 02.08.2023

AUTHORISED CAPITAL

Particulars	Number of shares	Nominal value per share (In Rs.)	Total Authorised Capital (In Rs.)
Equity	14000000	10	140000000
Preference	0	0	0
Unclassified	0	0	0

ISSUED CAPITAL

Particulars	Number of shares	Nominal value per share (In Rs.)	Total Issued Capital (In Rs.)
Equity	11525540	10	115255400
Preference	0	0	0
Unclassified	0	0	0

SUBSCRIBED CAPITAL

Particulars	Number of shares	Nominal value per share (In Rs.)	Total Subscribed Capital (In Rs.)
Equity	11525540	10	115255400
Preference	0	0	0
Unclassified	0	0	0

PAID UP CAPITAL

Particulars	Number of shares	Nominal value per share (In Rs.)	Total Paid up Capital (In Rs.)
Equity	11525540	10	115255400
Preference	0	0	0
Unclassified	0	0	0

LISTED CAPITAL

Particulars	Number of shares	Nominal value per share (In Rs.)	Total Listed Capital (In Rs.)	Name of Stock Exchange where listed
Equity	11525540	10	115255400	BSE Limited
Preference	0	0	0	-
Unclassified	0	0	0	-



ANNEXURE II

SHAREHOLDING PATTERN AS ON 01.08.2023

Category	No. of shares	%
Acquirer: (a) who decides to make an offer for delisting of equity shares and Persons acting in concert in accordance with Regulation 5A of the Takeover Regulations or b) who is a Promoter or part of Promoter Group along with persons acting in concert	8640590	74.97
Public Shareholders	2884950	25.03
Total	11525540	100





ANNEXURE III

The Distribution of Public shareholding as on 01.08.2023

Range of Shareholding	No. of shareholders	% of shareholders	No. of shares held	% of total shares
1-100	3497	82.7888	313730	2.7220
101-500	510	12.0738	152666	1.3245
501-1000	109	2.5804	83157	0.7215
1001-2000	52	1.2310	79829	0.6926
2001-3000	11	0.2604	27665	0.2400
3001-4000	9	0.2130	29644	0.2572
4001-5000	4	0.0946	18328	0.1590
5001-10000	6	0.1420	41588	0.3608
100001 And Above	22	0.0052	2138343	18.55
Acquirer a) who decides to make an offer for delisting of equity shares and Persons acting in concert in accordance with Regulation 5A of the Takeover Regulations or b) who is a Promoter or part of Promoter Group along with persons acting in concert	4	0.0009	8640590	74.97
Total	4224	100	11525540	100





ANNEXURE IV

Details of Top Twenty-Five Shareholders (other than Acquirer) as on 01.08.2023

S.No.	Name of Shareholder	No. of shares	% to paid up equity capital
1.	MALATHI JAGADEESAN	1068530	9.27098
2.	VIJAYARAGAVAN CHANDRASEKAR	440000	3.81761
3.	K. SUNDARESWARAN	398588	3.4583
4.	J RAJALAKSHMI	256820	2.22827
5.	ISHWARI SUNDARESWARAN	240774	2.08905
6.	J RAMKUMAR	209950	1.82161
7.	VIJAYALAKSHMI VIJAYARAGAVAN	200106	1.7362
8.	P RAJASEKARAN	169484	1.47051
9.	RAJU AJIT BHANDARI	133217	1.15584
10.	RAJU BHANDARI	127011	1.102
11.	KRISHNAKUMAR RAMACHANDRAN	64724	0.56157
12.	S MOHANVEL	57200	0.49629
13.	SAKTHINATHAN AMSAVENI	56373	0.48911
14.	KAMAL KUMAR GOYAL	44635	0.38727
15.	S SUBRAMANIAN	40000	0.34706
16.	MAHENDRA GIRDHARILAL	34899	0.3028
17.	SHANMUGAM MOHANAVEL	19609	0.17014
18.	FATEMA HUSSAINI BHARMAL	18100	0.15704
19.	SYKES & RAY EQUITIES (I) LTD	15844	0.13747
20.	SUBODH RAJARAM MANJREKAR	15100	0.13101
21.	PUNJAB NATIONAL BANK	13800	0.11973
22.	NAYAN S MANJREKAR	13700	0.11887
23.	BAJAJ AUTO LTD	12700	0.11019
24.	SUHAS S KULKARNI	12300	0.10672
25.	BHARAT HARILAL SHAH	10179	0.08832
	TOTAL	3673643	31.87393



The Board of Directors
Thambbi Modern Spinning Mills Limited
Omalar Road, Jagir Ammapalayam,
Salem, Tamilnadu – 636302.

RECONCILIATION OF SHARE CAPITAL AUDIT REPORT
[Under Regulation 76 of SEBI (Depository and Participants) Regulations,2018 read with Regulation 12(2) of
SEBI (Delisting of Equity Shares) Regulations, 2021]

1.	For Period	02.02.2023 – 01.08.2023	
2.	ISIN	INE830D01016	
3.	Face Value	Rs.10/- per Equity Share	
4.	Name of the Company	Thambbi Modern Spinning Mills Limited	
5.	Registered Office Address	Omalar Road, Jagir Ammapalayam, Salem, Tamilnadu - 636302	
6.	Correspondence Address	Omalar Road, Jagir Ammapalayam, Salem, Tamilnadu - 636302	
7.	Telephone & Fax Nos.	Telephone No : 0427-2345425 Fax No : 0427-2346079	
8.	Email address	tmsml@gmail.com	
9.	Names of the Stock Exchanges where the Company's Securities are listed	1. BSE Limited	
		No. of Shares	% of Total Issued Capital
10.	Issued Capital	1,15,25,540	100.00
11.	Listed Capital (All Exchanges) (as per Company records)	1,15,25,540	100.00
12.	Held in Dematerialized form in CDSL	10,41,020	9.0323
13.	Held in Dematerialized form in NSDL	1,01,12,591	87.7407
14.	Physical	3,71,929	3.2270
15.	Total No. of Shares (12+13+14)	1,15,25,540	100.00
16.	Reasons for difference, Between(10&11), (10&15), (11&15)	Not applicable	

17. Certifying the details of changes in share capital during the period under consideration as per Table below:

Particulars ***	No. of Shares	Applied/Not applied for listing	Listed on Stock Exchanges (specify names)	Whether intimated to CDSL	Whether intimated to NSDL	In-principle Approval pending from Stock Exchanges (specify names)
NIL	NIL	NIL	NIL	NIL	NIL	NIL

*** Rights, Bonus, Preferential Issue, ESOPs, Amalgamation, Conversion, Buyback, Capital Reduction, Forfeiture, Any other (to specify)






18.	Register of Members is updated (Yes/No)	Yes		
	If not, updated up to which date	Not Applicable.		
19.	Reference of previous period with regards to excess dematerialized shares, if any	Not Applicable.		
20.	Has the Company resolved the matter mentioned in point no.19 above in the current period? If not, reason why?	Not Applicable.		
21.	Mention the total No. of requests, if any, confirmed after 21 days and the total No. of requests pending beyond 21 days with the reasons for delay:			
	Total No. of Demat Requests	No. of Requests	No. of Shares	Reasons for delay
	Confirmed after 21 days	NIL	NIL	NIL
	Pending for more than 21 days	NIL	NIL	NIL
22.	Name, Telephone & Fax No. of the Compliance Officer of the Company	Ms. Mohan Uma Maheshwari Company Secretary Telephone No : 0427-2345425 Fax No : 0427-2346079		
23.	Name, Address, Tel & Fax No., Regn. No. of the Auditor	CS R.Sridharan, R Sridharan & Associates, Company Secretaries, New No.44, Old No.25, Flat No.3, Thiruvarangam Apartments, First Floor, Unnamalai Ammal Street, T.Nagar, Chennai – 600 017.Tel: 044 4216 6988; Email id : Sridharan.r@aryes.in, C.P. No. 3239, FCS No.4775		
24.	Appointment of Common Agency for Share Registry Work	Yes, Cameo Corporate Services Limited, Subramanian Building, 1, Club House Road, Chennai 600 002.Tel: (044) 2846 0390 (6 lines). Fax: (044) 2846 0129		
25.	Any other detail that the Auditor may like to provide (eg. BIFR Company, delisting from SE, Company changed its name, etc.)	This Report is being provided in connection with the Voluntary Delisting of the Equity Shares of the Company from BSE, announced vide Initial Public Announcement dated 14 th July 2023 by the Acquirer viz., Mr. Ramasamy Udayar Jagadeesan		

FOR R.SRIDHARAN & ASSOCIATES
COMPANY SECRETARIES




CS R.SRIDHARAN
C.P No.3239
FCS.No.4775
PR NO.657/2020
UIN: S2003TN063400
UDIN: F004775E000723823