

| (1)(a) STATEMENT SHOWING SHAREHOLDING PATTERN IN CLAUSE-35  |                               |  |   |
|---|-------------------------------|--|---|
| NAME OF THE COMPANY: ACTION CONSTRUCTION EQUIPMENT LIMITED  |                               |  |   |
| SCRIP CODE:   | 532762                        | Name of the Scrip :  | ACE   |
| Class of Security:  |                               |  |   |
| QUARTER ENDED:  | 30/06/2014                    |  |   |
| Partly paid-up shares   | No. of partly paid-up shares  | As a % of total no. of partly paid-up shares               | As a % of total no. of shares of the Company.   |
| Held by promoter/promoter group   | 0                             | 0  | 0   |
| Held by Public  | 0                             | 0  | 0   |
| Total:  | 0                             | 0  | 0   |
| Outstanding convertible securities:   | No. of outstanding securities | As a % of total no. of outstanding convertible securities. | As a % of total no. of shares of the Company assuming full conversion of the convertible securities |
| Held by promoter/promoter group   | 0                             | 0  | 0   |
| Held by Public  | 0                             | 0  | 0   |
| Total:  | 0                             | 0  | 0   |
| Warrants:   | No. of warrants               | As a % of total no. of warrants                            | As a % of total no. of shares of the Company, assuming full conversion of warrants                  |
| Held by promoter/promoter group   | 0                             | 0  | 0   |
| Held by Public  | 0                             | 0  | 0   |
| Total:  | 0                             | 0  | 0   |
| Total paid-up capital of the Company, assuming full conversion of warrants and convertible securities | 98940000                      | 0  | 100.00  |



STATEMENT SHOWING SHAREHOLDING PATTERN IN CLAUSE-35  
QUARTER ENDED: 30/06/2014

| CATEGORY CODE | CATEGORY OF SHAREHOLDER                  | NO OF SHAREHOLDERS | TOTAL NUMBER OF SHARES | NO OF SHARES HELD IN DEMATERIALIZED FORM | TOTAL SHAREHOLDING AS A % OF TOTAL NO OF SHARES |                            | SHARES PLEDGE OR OTHERWISE ENCUMBERED |                      |
|---------------|--|--------------------|------------------------|--|---|----------------------------|---------------------------------------|----------------------|
|               |  |                    |                        |  | AS a PERCENTAGE of (A+B)                        | As a PERCENTAGE of (A+B+C) | NUMBER OF SHARES                      | AS a PERCENTAGE      |
| (I)           | (II)                                     | (III)              | (IV)                   | (V)                                      | (VI)  | (VII)                      | (VIII)                                | (IX)=(VIII)/(IV)*100 |
| (A)           | PROMOTER AND PROMOTER GROUP              |                    |                        |  |   |                            |                                       |                      |
| (1)           | INDIAN                                   |                    |                        |  |   |                            |                                       |                      |
| (a)           | Individual /HUF                          | 8                  | 67527314               | 67527314                                 | 68.25   | 68.25                      | 105600                                | 0.16                 |
| (b)           | Central Government/State Government(s)   | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (c)           | Bodies Corporate                         | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (d)           | Financial Institutions / Banks           | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (e)           | Others                                   | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
|               | Sub-Total A(1) :                         | 8                  | 67527314               | 67527314                                 | 68.25   | 68.25                      | 105600                                | 0.16                 |
| (2)           | FOREIGN                                  |                    |                        |  |   |                            |                                       |                      |
| (a)           | Individuals (NRIs/Foreign Individuals)   | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (b)           | Bodies Corporate                         | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (c)           | Institutions                             | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (d)           | Qualified Foreign Investor               | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
| (e)           | Others                                   | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
|               | Sub-Total A(2) :                         | 0                  | 0                      | 0  | 0.00  | 0.00                       | 0                                     | 0.00                 |
|               | Total A=A(1)+A(2)                        | 8                  | 67527314               | 67527314                                 | 68.25   | 68.25                      | 105600                                | 0.16                 |
| (B)           | PUBLIC SHAREHOLDING                      |                    |                        |  |   |                            |                                       |                      |
| (1)           | INSTITUTIONS                             |                    |                        |  |   |                            |                                       |                      |
| (a)           | Mutual Funds /UTI                        | 2                  | 2802706                | 2802706                                  | 2.83  | 2.83                       |                                       |                      |
| (b)           | Financial Institutions /Banks            | 2                  | 7220                   | 7220                                     | 0.01  | 0.01                       |                                       |                      |
| (c)           | Central Government / State Government(s) | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
| (d)           | Venture Capital Funds                    | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
| (e)           | Insurance Companies                      | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
| (f)           | Foreign Institutional Investors          | 1                  | 198987                 | 198987                                   | 0.20  | 0.20                       |                                       |                      |
| (g)           | Foreign Venture Capital Investors        | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
| (h)           | Qualified Foreign Investor               | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
| (i)           | Others                                   | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |



| CATEGORY CODE | CATEGORY OF SHAREHOLDER   | NO OF SHAREHOLDERS | TOTAL NUMBER OF SHARES | NO OF SHARES HELD IN DEMATERIALIZED FORM | TOTAL SHAREHOLDING AS A % OF TOTAL NO OF SHARES |                            | SHARES PLEDGE OR OTHERWISE ENCUMBERED |                      |
|---------------|---|--------------------|------------------------|--|---|----------------------------|---------------------------------------|----------------------|
|               |   |                    |                        |  | AS a PERCENTAGE of (A+B)                        | As a PERCENTAGE of (A+B+C) | NUMBER OF SHARES                      | AS a PERCENTAGE      |
| (I)           | (II)  | (III)              | (IV)                   | (V)                                      | (VI)  | (VII)                      | (VIII)                                | (IX)=(VIII)/(IV)*100 |
|               | Sub-Total B(1) :  | 5                  | 3008913                | 3008913                                  | 3.04  | 3.04                       |                                       |                      |
| (2)           | NON-INSTITUTIONS  |                    |                        |  |   |                            |                                       |                      |
| (a)           | Bodies Corporate  | 569                | 8097982                | 8097982                                  | 8.18  | 8.18                       |                                       |                      |
| (b)           | Individuals   |                    |                        |  |   |                            |                                       |                      |
|               | (i) Individuals holding nominal share capital upto Rs.1 lakh                  | 29446              | 15180396               | 15103417                                 | 15.34   | 15.34                      |                                       |                      |
|               | (ii) Individuals holding nominal share capital in excess of Rs.1 lakh         | 26                 | 4124342                | 4124342                                  | 4.17  | 4.17                       |                                       |                      |
| (c)           | Others  |                    |                        |  |   |                            |                                       |                      |
|               | NON RESIDENT INDIANS  | 224                | 585071                 | 585071                                   | 0.59  | 0.59                       |                                       |                      |
|               | CLEARING MEMBERS  | 186                | 414982                 | 414982                                   | 0.42  | 0.42                       |                                       |                      |
|               | TRUSTS  | 1                  | 1000                   | 1000                                     | 0.00  | 0.00                       |                                       |                      |
| (d)           | Qualified Foreign Investor  | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
|               | Sub-Total B(2) :  | 30452              | 28403773               | 28326794                                 | 28.71   | 28.71                      |                                       |                      |
|               | Total B=B(1)+B(2) :   | 30457              | 31412686               | 31335707                                 | 31.75   | 31.75                      |                                       |                      |
|               | Total (A+B) :   | 30465              | 98940000               | 98863021                                 | 100.00  | 100.00                     |                                       |                      |
| (C)           | Shares held by custodians, against which Depository Receipts have been issued |                    |                        |  |   |                            |                                       |                      |
| (1)           | Promoter and Promoter Group   |                    |                        |  |   |                            |                                       |                      |
| (2)           | Public  | 0                  | 0                      | 0  | 0.00  | 0.00                       |                                       |                      |
|               | GRAND TOTAL (A+B+C) :   | 30465              | 98940000               | 98863021                                 | 100.00  | 0.00                       | 105600                                | 0.11                 |



| (b) Statement showing holding of securities (including shares, warrants, convertible securities) of persons belonging to the category "Promoter and Promoter Group" |                         |                             |   |                       |                                       |   |                                   |   |  |   |   |
|---|-------------------------|-----------------------------|---|-----------------------|---------------------------------------|---|-----------------------------------|---|--|---|---|
| Sr.No   | Name of the Shareholder | Details of Shares held      |   | Encumbered shares (*) |                                       |   | Details of Warrants               |   | Details of convertible securities            |   | Total Shares (including underlying shares assuming ft. 1 conversion of warrants and convertible securities) as a % of diluted share capital |
|   |                         | No. of Shares held<br>(III) | As a % of grand total (A)+(B)+(C)<br>(IV) | Pledge Shares<br>(V)  | AS a percentage<br>(VI)=(V)/(III)*100 | AS a % of grand total (A) + (B) + (C) of sub-clause (i)(a)<br>(VII) | Number of warrants held<br>(VIII) | As a % total number of warrants of the same class<br>(IX) | Number of convertible securities held<br>(X) | As a % total number of convertible securities of the same class<br>(XI) |   |
| (I)   | (II)                    |                             |   |                       |                                       |   |                                   |   |  |   | (XII)   |
| 1   | VIJAY AGARWAL           | 29538550                    | 29.86                                     | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 29.86   |
| 2   | MONA AGARWAL            | 26343650                    | 26.63                                     | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 26.63   |
| 3   | VIJAY AGARWAL           | 4450157                     | 4.50                                      | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 4.50  |
| 4   | SORAB AGARWAL           | 3446090                     | 3.48                                      | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 3.48  |
| 5   | SURBHI GARG             | 3250550                     | 3.29                                      | 105600                | 3.25                                  | 0.11  | 0                                 | 0.00  | 0  | 0.00  | 3.29  |
| 6   | MONA AGGARWAL           | 294157                      | 0.30                                      | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 0.30  |
| 7   | SORAB AGARWAL           | 154100                      | 0.16                                      | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 0.16  |
| 8   | ANURADHA GARG           | 50000                       | 0.05                                      | 0                     | 0.00                                  | 0.00  | 0                                 | 0.00  | 0  | 0.00  | 0.05  |
| TOTAL :   |                         | 67527314                    | 68.25                                     | 105600                | 0.16                                  | 0.11  | 0                                 | 0.00  | 0  | 0.00  | 68.25   |



| 10(c)(i) Statement showing holding of securities (including shares, warrants, convertible securities) of persons belonging to the category "Public" and holding more than 1% of the total number of shares |                              |                       |  |                         |   |                                       |  |  |
|--|------------------------------|-----------------------|--|-------------------------|---|---------------------------------------|--|--|
| Sr.No.   | Name of the shareholder      | Number of shares held | Shares as a percentage of total number of shares (i.e., Grant total (A)+(B)+(C) indicated in Statement at para (i)(a) above) | Details of warrants     |   | Details of convertible securities     |  | Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of dilute share capital) |
|  |                              |                       |  | Number of warrants held | As a % total number of warrants of the same class | Number of convertible securities held | % w.r.t total number of convertible securities of the same class |  |
| 1  | RELIGARE FINVEST LTD         | 3006651               | 3.04   | 0                       | 0.00  | 0                                     | 0.00   | 3.04   |
| 2  | DSP BLACKROCK MICRO CAP FUND | 2041222               | 2.05   | 0                       | 0.00  | 0                                     | 0.00   | 2.05   |
| TOTAL :  |                              | 5047873               | 5.10   | 0                       | 0.00  | 0                                     | 0.00   | 5.10   |



| (ii)(c)(ii) Statement showing holding of securities (including shares, warrants, convertible securities) of persons (together with PAC) belonging to the category "Public" and holding more than 5% of the total number of shares of the company |  |                       |  |                         |   |                                       |  |   |
|--|--|-----------------------|--|-------------------------|---|---------------------------------------|--|---|
| Sr.No.   | Name(s) of the shareholder(s) and the Persons Acting in Concert (PAC) with | Number of shares held | Shares as a percentage of total number of shares (i.e., Grant total (A)+(B)+(C) indicated in Statement at para (i)(a) above) | Details of warrants     |   | Details of convertible securities     |  | Total shares (including underlying shares assuming full conversion of warrants and convertible securities) as a % of diluted share capital) |
|  |  |                       |  | Number of warrants held | As a % total number of warrants of the same class | Number of convertible securities held | % w.r.t total number of convertible securities of the same class |   |
| TOTAL :  |  | 0                     | 0  | 0                       | 0   | 0                                     | 0  | 0   |



| (I)(d) STATEMENT SHOWING DETAILS OF LOCKED-IN SHARES" |  |   |  |   |
|---|--|---|--|---|
| Sr.No.  |  | Name of the shareholder   |  |   |
|   |  | Number of locked-in shares  |  |   |
|   |  | Locked-in shares as a (%) percentage of total number of shares {i.e, Grand Total (A)+(B)+(C) Indicated in Statement at para (I)(a) above} |  |   |
|   |  | Promoter/Promoter Group/Public  |  |   |
| TOTAL :   |  | 0   |  | 0 |



| (II)(a) STATEMENT SHOWING DETAILS OF DEPOSITORY RECEIPTS (DRS) |  |                           |   |  |
|--|--|---------------------------|---|--|
| Sr.No.   | Type of outstanding DR (ADRs,GDRs,SDRs,etc.) | Number of outstanding DRS | Number of shares underlying outstanding DRS | Shares underlying outstanding DRS as a percentage of total number of shares (i.e., Grand Total (A)+(B)+(C) indicated in Statement at Para(I)(a) above) |
| TOTAL :  |  | 0                         | 0   | 0  |





|         |   |   |   |  |
|---------|---|---|---|--|
| (II)(b) | Statement showing Holding of Depository Receipts (DRs), where underlying shares held by "Promoter/Promoter group" are in excess of 1% of the total number shares. |   |   |  |
| Sr.No.  | Name of the DR Holder   | Type of outstanding DR (ADRs,GDRs,SDRs, etc.) | Number of shares underlying outstanding DRs | Shares underlying outstanding DRs as a percentage of total number of shares (i.e., Grand Total (A)+(B)+(C) indicated in Statement at para(I)(a) above) |
|         | TOTAL :   |   | 0   | 0  |

