

Action Construction Equipment Ltd.

Corporate & Regd. Office

Dudhola Link Road, Dudhola, Distt. Palwal - 121102, Haryana, India



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Format of holding of specified securities

1. Name of Listed Entity:		ACTION CONSTRUCTION EQUIPMENT LIMITED	
2. Scrip Code/Name of Scrip/Class of Security		BSE:532762, NSE:ACE/EQU	
3. Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)		31(1)(b)	
a.	If under 31(1)(b) then indicate the report for Quarter ending	30/09/2026	
b.	If under 31(1)(c) then indicate date of allotment/extinguishment	NA	
4. Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-			
S.N	Particulars	Yes*	No*
1.	Whether the Listed Entity has issued any partly paid up shares?		No
2.	Whether the Listed Entity has issued any Convertible Securities or Warrants?		No
3.	Whether the Listed Entity has any shares against which depository receipts are issued?		No
4.	Whether the Listed Entity has any shares in locked-in?		No
5.	Whether any shares held by promoters are pledge or otherwise encumbered?		No

* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

5. The tabular format for disclosure of holding of specified securities is as follows:-

For Action Construction Equipment Limited

Anil Kumar
Company Secretary
M.No. ACS:37791



Table 1 - Summary Statement holding of specified securities

Category	Category of shareholder	Nos. of sharehold-ers	No. of fully paid up equity shares held	No. of Partly paid up equity shares held	Total nos. shares held	Sharehold- ing as a % of total shares (calculate as per Depository, SCRR, 1957) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			No. of Shares Underly- ing Outstand- ing converti- ble securiti- es	No. of Shares Underly- ing Outstand- ing converti- ble securiti- es (as a % of diluted shares)	No. of Outstanding Grants	No. of Shares Underly- ing Outstand- ing converti- ble securiti- es (including ESOP, Warrants)	Sharehold- ing, as a % of fully diluted basis (including warrants ESOP, convertible securities etc. (as a % of diluted shares)	Number of Locked in shares	Number of Shares pledged or otherwise	Non- Disposal Undertaking	Other encumbranc- es, if any	Total Number of shares	Number of equity shares held in dematerializ- ed form
							Class:Equity	No of Voting Rights	Total as a % of (A+B+C)											
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)=(iv)+(v)+(vi)	(viii)	(ix)	(x)	(xi)=(vii)+(x)	(xii)	(xiii)	(xiv)	(xv)	(xvi)	(xvii)=(xiv)+(xv)+(xvi)	(xviii)	(xix)	(xx)	(xxi)
(A)	Promoter & Promoter Group	5	77908063	0	77908063	65.42	77908063		77908063.00	65.42	0.00	0.00	0.00	0	77908063	65.42	0	0	0.00	77908063
(B)	Public	179070	41128166	0	41128166	34.54	41128166		41128166.00	34.54	0.00	0.00	0.00	0	41128166	34.54	0	0	0.00	41119631
(C)	Non Promoter- Non Public				0															
(C1)	Shares underlying DRs	0		0	0	0	0	0	0	0.00	0.00	0.00	0.00	0	0	0	0	0	0.00	0
(C2)	Shares held by Employee Trusts	1	46967	0	46967	0.04	46967		46967	0.04	0.00	0.00	0.00	0	46967	0.04	0	0	0.00	46967
	Total	179076	119083196	0	119083196	100.00	119083196	0.00	119083196.00	100.00	0.00	0.00	0.00	0	119083196	100.00	0	0	0.00	119074661



Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the Shareholders	Entity type i.e. promoter OR promoter group entity (except promoter)	PAN	No. of shares held	No. of fully paid up equity shares held	Partly paid-up equity shares held	Nos. of shares underlying Depository Receipts	Total nos. shares held (VI)+(VII)+(VIII)+(IX)+(X)+(XI)+(XII)+(XIII)+(XIV)+(XV)+(XVI)+(XVII)+(XVIII)+(XIX)+(XX)+(XXI)+(XXII)+(XXIII)+(XXIV)+(XXV)+(XXVI)+(XXVII)+(XXVIII)+(XXIX)+(XXX)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C+D)	Number of Voting Rights held in each class of securities				No. of Outstanding ESOPs	No. of Outstanding convertible securities (warrants, etc)	Total No. of shares on fully diluted basis (including ESOPs, convertible securities etc)	Total Shareholding as a % of fully diluted form	Number of Locked in shares	Number of Shares pledged or otherwise encumbered	Non Disposal Undertaking	Other encumbrances if any	Total Number of shares encumbered	Number of equity shares held in dematerialized form
									No of Voting Rights			Total as a % of Voting rights										
									Class X	Class Y	Total											
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)=(v)+(vi)+(vii)+(viii)+(ix)+(x)+(xi)+(xii)+(xiii)+(xiv)+(xv)+(xvi)+(xvii)+(xviii)+(xix)+(xx)+(xxi)+(xxii)+(xxiii)+(xxiv)+(xxv)+(xxvi)+(xxvii)+(xxviii)+(xxix)+(xxx)	(ix)	(x)	(xi)	(xii)=(viii)+(xi)	(xiii)=(xii)+(xiii)+(xiv)+(xv)+(xvi)+(xvii)+(xviii)+(xix)+(xx)+(xxi)+(xxii)+(xxiii)+(xxiv)+(xxv)+(xxvi)+(xxvii)+(xxviii)+(xxix)+(xxx)	(xiv)	(xv)	(xvi)	(xvii)	(xviii)	(xix)				
1	Indian																					
(a)	Individual/Hindu Undivided Family		5	77908063	0	0	77908063	65.42	77908063	0	77908063	0	77908063.00	65.42	0.00	0.00	0.00	0.00	0.00	0.00	0	77908063
	VIJAY AGARWAL	Promotor		34246678	0	0	34246678	28.76	34246678				34246678.00	28.76	0.00	0.00	0.00	0.00	0.00	0.00	0	34246678
	MONA AGARWAL	Promotor		29357579	0	0	29357579	24.65	29357579				29357579.00	24.65	0.00	0.00	0.00	0.00	0.00	0.00	0	29357579
	SORAB AGARWAL	Promotor		7323650	0	0	7323650	6.15	7323650				7323650.00	6.15	0.00	0.00	0.00	0.00	0.00	0.00	0	7323650
	SURBHI GARG	Promotor		6930156	0	0	6930156	5.82	6930156				6930156.00	5.82	0.00	0.00	0.00	0.00	0.00	0.00	0	6930156
	ANURADHA GARG	Promotor Group		50000	0	0	50000	0.04	50000				50000.00	0.04	0.00	0.00	0.00	0.00	0.00	0.00	0	50000
(b)	Central Government/State		0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
(c)	Financial Institutions/Banks		0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
(d)	Any Other (Specify)		0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
	Sub Total (A)(1)		5	77908063	0	0	77908063	65.42	77908063	0	77908063	0	77908063.00	65.42	0.00	0.00	0.00	0.00	0.00	0.00	0	77908063
2	Foreign		0	0	0	0	0	0.00	0	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
(a)	Individual/Non Resident Individual/Foreign Individual												0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0	0
(b)	Government																					
(c)	Institutions																					
(d)	Foreign Portfolio Investor																					
(e)	Any Other (Specify)																					
	Sub Total (A)(2)																					
	Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)		5	77908063	0	0	77908063	65.42	77908063	0	77908063	0	77908063.00	65.42	0.00	0.00	0.00	0.00	0.00	0.00	0	77908063



Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders	PAN	Nos. of share holder	No. of fully paid up equity shares held	No. of shares held	Shareholding % as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			No. of Shares Outstanding	No. of Shares Underlying Outstanding ESOP Grants	No. of Shares Underlying Outstanding ESOPs	Total No of shares on fully diluted basis (including warrants, ESOP convertible securities etc.	Total shareholding, as a % of full conversion of convertible securities etc.	Number of Locked In shares	Number of Shares pledged or held (a)	Non-Disposal Undertaking (a)	Other encumbrances, if any (Not applicable)	Total Number of Shares (b)	Number of equity shares held in dematerialized form	Sub-categorization of shares (No. of shares)	
						Class X	Class Y	Total													
																					No. of Voting Rights
(i)	(ii)	(iii)	(iv)	(v)	(vi)=(iv)+(v)+(vi)	(vii)=(iv)+(v)+(vi)	(ix)	(x)	(xi)=(vii)-(x)	(xii)	(xiii)	(xiv)	(xv)	(xvi)	(xvii)=(xi)+(xvi)+(xvii)	(xviii)	(xix)	(xx)	(xxi)	(xxii)	
1	Institutions Domestic																				
(a)	Mutual Fund		20	2325417	0	2325417	1.95	0.00	1.95	2325417	0	0	2325417	1.95	0.00	0.00	0.00	0.00	0.00	2325417.00	
(b)	Venture Capital Funds		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(c)	Alternate Investment Funds		17	878297	0	878297	0.74	0.00	0.74	878297	0	0	878297	0.74	0.00	0.00	0.00	0.00	0.00	878297.00	
(d)	Banks		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(e)	Insurance Companies		6	417351	0	417351	0.35	0.00	0.35	417351	0	0	417351	0.35	0.00	0.00	0.00	0.00	0.00	417351.00	
(f)	Provident Fund/Pension Fund		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(g)	Asset Reconstruction		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(h)	Sovereign Wealth Fund		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(i)	NBFCs Registered with RBI		1	8319	0	8319	0.01	0.00	0.01	8319	0	0	8319	0.01	0.00	0.00	0.00	0.00	0.00	8319.00	
(j)	Other Financial Institutions		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(k)	Any Other Specified		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Sub Total (B)(1)		44	3629384	0	3629384	3.05	0.00	3.05	3629384	0	0	3629384	3.05	0.00	0.00	0.00	0.00	0.00	3629384.00	
2	Institutions Foreign																				
(a)	Foreign Direct Investment		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(b)	Foreign Venture Capital Investors		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(c)	Sovereign Wealth Fund		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(d)	Foreign Portfolio Investors Category I		106	9338018	0	9338018	7.84	0.00	7.84	9338018	0	0	9338018	7.84	0.00	0.00	0.00	0.00	0.00	9338018.00	
	MASSACHUSETTS INSTITUTE OF TECHNOLOGY			2189000	0	2189000	1.84	0.00	1.84	2189000	0	0	2189000	1.84	0.00	0.00	0.00	0.00	0.00	2189000.00	
(e)	Foreign Portfolio Investors Category II		21	713548	0	713548	0.60	0.00	0.60	713548	0	0	713548	0.60	0.00	0.00	0.00	0.00	0.00	713548.00	
(f)	Overseas Depositories (holding DRs) (balancing figure)		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
(g)	Any Other (Specify)		2	25180	0	25180	0.02	0.00	0.02	25180	0	0	25180	0.02	0.00	0.00	0.00	0.00	0.00	25180.00	
	Sub Total (B)(2)		129	10076746	0	10076746	8.46	0.00	8.46	10076746	0	0	10076746	8.46	0.00	0.00	0.00	0.00	0.00	10076746.00	
3	Central Government/State Government																				
a	Central Government/President of India		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
b	State Government/Governor		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
c	State Government/Governor		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	Sub Total (B)(3)		0	0	0	0	0.00	0.00	0.00	0	0	0	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

Category & Name of the Shareholders	PAN	No. of share holder	No. of fully paid up equity shares held	Partly paid-up equity shares held	Nos. of shares underlying Depository Receipts	Total no. of shares held (VII)=(IV)+(V)+(VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible Warrants	No. of Shares Underlying ESOP	No. of Undiluted Shares (including Outstanding ESOP)	Total no. of shares held as a % assuming full dilution (X)+(XI)+(XII)+(XIII)+(XIV)+(XV)+(XVI)+(XVII)+(XVIII)	Number of Locked in shares	Number of Shares pledged or		Non Disposal Undertakin		Other encumbrances if any		Total Number of Shares encumbered		Number of equity shares held in dematerialized form (Not (XVIII))
								No of Voting Rights			Total as a % of Total Voting rights						No.	As a % of total applicable shares held	No.	As a % of total applicable shares held	No.	As a % of total applicable shares held	No.	As a % of total applicable shares held	
								Class X	Class Y	Total															
C1 Custodian/DR Holder			0	46967	0	46967	0.04	46967	0	46967	0.04	0.00	0.04	0.00	0.04	0	0	0.00	0.00	0.00	0.00	0.00	0.00	46967.00	
C2 Employees Benefit Trust (Under SEBI (Share Based Employee Benefit Regulation 2014)		1				0	-			0	0.00	0.00				0	0								
1 ACTION CONSTRUCTION EQUIPMENT LIMITED EMPLOYEES WELFARE TRUS			46967	0		46967	0.04	46967		46967	0.04	0.00	0.04	0.00	0.04	0	0	0.00					46967.00		
Total Non Promoter Non Public Shareholding: (C1)+(C2)		1	46967	0	0	46967	0.04	46967	0	46967	0.04	0.00	0.04	0.00	0.04	0	0	0.00	0.00	0.00	0.00	0.00	0.00	46967.00	



Ramgopal

Table V - Statement Showing Details of Significant beneficial Owners (SBOs)

[illegible]

* In case the nature of the holding/ exercise of the right of a SBO falls under multiple categories specified under (a) to (e) under Column III, multiple rows for the same SBO shall be inserted
.....accordingly for each of the categories.

* This column shall have the details as specified by the listed entity under Form No. BEN-2 as submitted to the Registrar.

\$ PAN / Passport number not to be disclosed on the website of the Stock Exchange



Annexure B

Table VI - Statement showing foreign ownership limits

	Board approved limits	Limits utilized
As on shareholding date	100	9.55
As on the end of previous 1st quarter	100	8.96
As on the end of previous 2nd quarter	100	10.69
As on the end of previous 3rd quarter	100	11.52
As on the end of previous 4th quarter	100	12.54



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