

# Action Construction Equipment Ltd.

Corporate & Regd. Office

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



Annexure - I

## 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/ EQUITY          |
| 3. | Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)  | Reg. 31(1)(b)                         |
| a. | If under 31(1)(b) then indicate the report for Quarter ending  | 30/09/2023                            |
| b. | If under 31(1)(c) then indicate date of allotment/extinguishment   | NA                                    |
| 4. | <b>Declaration:</b> The Listed entity is required to submit the following declaration to the extent of submission of information:- |                                       |

| 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   |      | 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

  
Authorised Signatory



(ANIL KUMAR)  
Company Secretary  
M-No. ACS: 27991



Table 1 - Summary Statement holding of specified securities

| Category | Category of shareholder        | Nos. of shareholders | No. of fully paid up equity shares held | No. of Partly paid-up equity shares held | No. of Depository Receipts | Total nos. shares held | Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % | Number of Voting Rights of securities |                   |                | Total as a % of (A+B+C) | No. of Outstanding convertible securities (including Warrants) | Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) | Number of Locked in shares |                                 | Number of Shares pledged or otherwise |                                 | Number of equity shares held in dematerialized form |
|----------|--------------------------------|----------------------|---|--|----------------------------|------------------------|--|---------------------------------------|-------------------|----------------|-------------------------|--|--|----------------------------|---------------------------------|---------------------------------------|---------------------------------|---|
|          |                                |                      |   |  |                            |                        |  | Class: Equity                         | Class: Preference | Total          |                         |  |  | No. (a)                    | As a % of total Shares held (b) | No. (a)                               | As a % of total Shares held (b) |   |
|          |                                |                      |   |  |                            |                        |  |                                       |                   |                |                         |  |  |                            |                                 |                                       |                                 |   |
| (I)      | (II)                           | (III)                | (IV)                                    | (V)                                      | (VI)                       | (VII)=(IV)+(V)+(VI)    | (VIII)   | (IX)                                  | (X)               | (XI)=(VII)+(X) | (XII)                   | (XIII)   | (XIV)  |                            |                                 |                                       |                                 |   |
| (A)      | Promoter & Promoter Group      | 5                    | 79497463                                | 0  | 0                          | 79497463               | 66.76  | 79497463                              | 66.76             | 0              | 66.76                   | 0  | 79497463   | 0                          | 0                               | 0                                     | 79497463                        |   |
| (B)      | Public                         | 104241               | 39548262                                | 0  | 0                          | 39548262               | 33.21  | 39548262                              | 33.21             | 0              | 33.21                   | 0  | 39532493   | 0                          | 0                               | 0                                     | 39532493                        |   |
| (C)      | Non Promoter- Non Public       |                      |   |  |                            | 0                      |  |                                       |                   |                |                         |  |  |                            |                                 |                                       |                                 |   |
| (C1)     | Shares underlying DRs          | 0                    |   |  | 0                          | 0                      |  |                                       |                   | 0              |                         |  |  |                            |                                 |                                       | 0                               |   |
| (C2)     | Shares held by Employee Trusts | 1                    | 37471                                   | 0  |                            | 37471                  | 0.03   | 37471                                 | 0.03              | 0              | 0.03                    | 0  | 37471  | 0                          | 0                               | 0                                     | 37471                           |   |
|          | Total                          | 104247               | 119083196                               | 0  | 0                          | 119083196              | 100.00   | 119083196                             | 100.00            | 0              | 100.00                  | 0  | 119067427  | 0                          | 0                               | 0                                     | 119067427                       |   |



*Signature*

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 shareholder | 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)=(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 securities (including Warrants) | Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share) | Number of Locked In shares | Number of Shares pledged or otherwise encumbered | Number of equity shares held in dematerialized form |
|--|--|-----|--------------------|---|-----------------------------------|---|---|--|--|---------|----------------|-------------------------------------|--|--|----------------------------|--|---|
|  |  |     |                    |   |                                   |   |   |  | No of Voting Rights                                      |         |                |                                     |  |  |                            |  |   |
|  |  |     |                    |   |                                   |   |   |  | Class X  | Class Y | Total          | Total as a % of Total Voting rights |  |  |                            |  |   |
| 1  | (i)  |     |                    |   |                                   |   |   |  | (IX)   | (X)     | (XI)=(VII)+(X) | (XII)                               | (XIII)   | (XIV)  |                            |  |   |
| Indian   |  |     |                    |   |                                   |   |   |  |  |         |                |                                     |  |  |                            |  |   |
| (a) Individual/Hindu Undivided Family                                |  |     | 5                  | 79497463                                | 0                                 | 0   | 79497463                                  | 66.76  | 79497463   | 0       | 66.76          | 0                                   | 0.00   | 0  | 0.00                       | 79497463   |   |
| VIJAY AGARWAL  | Promotor   |     |                    | 34236078                                | 0                                 |   | 34236078                                  | 28.75  | 34236078   |         | 28.75          | 0                                   | 0.00   |  |                            | 34236078   |   |
| MONA AGARWAL   | Promotor   |     |                    | 30657579                                | 0                                 |   | 30657579                                  | 25.74  | 30657579   |         | 25.74          | 0                                   | 0.00   |  |                            | 30657579   |   |
| SORAB AGARWAL  | Promotor   |     |                    | 7623650                                 | 0                                 |   | 7623650                                   | 6.40   | 7623650  |         | 6.40           | 0                                   | 0.00   |  |                            | 7623650  |   |
| SURBHI GARG  | Promotor   |     |                    | 6930156                                 | 0                                 |   | 6930156                                   | 5.82   | 6930156  |         | 5.82           | 0                                   | 0.00   |  |                            | 6930156  |   |
| ANURADHA GARG  | Promotor Group   |     |                    | 50000                                   | 0                                 |   | 50000                                     | 0.04   | 50000  |         | 0.04           | 0                                   | 0.00   |  |                            | 50000  |   |
| (b) Central Government/State Government                              |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (c) Financial Institutions/Banks                                     |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (d) Any Other (Specify)  |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| Sub Total (A)(1)   |  |     | 5                  | 79497463                                | 0                                 | 0   | 79497463                                  | 66.76  | 79497463   | 0       | 66.76          | 0                                   | 0.00   |  |                            | 79497463   |   |
| Foreign  |  |     |                    |   |                                   |   |   | 0.00   |  |         | 0.00           |                                     | 0.00   |  |                            |  |   |
| (a) Individual/Non Resident Individual/Foreign Individual            |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (b) Government   |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (c) Institutions   |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (d) Foreign Portfolio Investor                                       |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| (e) Any Other (Specify)  |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| Sub Total (A)(2)   |  |     | 0                  | 0                                       | 0                                 | 0   | 0   | 0.00   | 0  | 0       | 0.00           | 0                                   | 0.00   |  |                            | 0  |   |
| Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2) |  |     | 5                  | 79497463                                | 0                                 | 0   | 79497463                                  | 66.76  | 79497463   | 0       | 66.76          | 0                                   | 0.00   |  |                            | 79497463   |   |







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

| Category & Name of the Shareholders   | PAN  | No. of shareholder | No. of fully paid up equity shares held | No. of partly paid up equity shares held | Nos. of shares underlying Depository Receipts | Total no. shares held | Shareholding % as per SCRR, 1957 As a % of (A+B+C2) | Number of Voting Rights held in each class of securities |         |       | Total Shareholding, as a % assuming full conversion of convertible securities | Number of Shares Locked in shares   |       | Number of Shares pledged or otherwise |       | Number of equity shares held in dematerialized form (Not Applicable) (XIV) |  |
|---|------|--------------------|---|--|---|-----------------------|---|--|---------|-------|---|-------------------------------------|-------|---------------------------------------|-------|--|--|
|   |      |                    |   |  |   |                       |   | No. of Voting Rights                                     |         |       |   | Total as a % of Total Voting rights | No.   | As a % of total Shares held           | No.   |  | As a % of total shares held (Not applicable) |
|   |      |                    |   |  |   |                       |   | Class X  | Class Y | Total |   |                                     |       |                                       |       |  |  |
| (i)   | (ii) | (iii)              | (iv)                                    | (v)                                      | (vi)  | (vii)=(iv)+(v)+(vi)   | (viii)  | (ix)   |         |       | (x)   | (xi)                                | (xii) | (xiii)                                | (xiv) |  |  |
| C1 Custodian/DR holder  |      | 0                  | 0                                       | 0  | 0   | 0                     | -   | 0  | 0       | 0     | 0.00  | 0                                   | 0.00  | 0                                     | 0.00  | 0  |  |
| C2 Employees Benefit Trust (Under SEBI (Share Based Employee Benefit Regulation 2014) |      | 1                  | 37471                                   | 0  | 0   | 37471                 | 0.03  | 0  | 0       | 0     | 0.00  | 0                                   | 0.00  | 0                                     | 0.00  | 37471  |  |
| Total Non Promoter Non Public Shareholding (C)= (C1)+(C2)                             |      | 0                  | 37471                                   | 0  | 0   | 37471                 | 0.03  | 0  | 0       | 0     | 0.00  | 0                                   | 0.00  | 0                                     | 0.00  | 37471  |  |



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Annexure B

Table VI - Statement showing foreign ownership limits

|                                       | Board approved limits | Limits utilized |
|---------------------------------------|-----------------------|-----------------|
| As on shareholding date               | 100                   | 10.09           |
| As on the end of previous 1st quarter | 100                   | 7.72            |
| As on the end of previous 2nd quarter | 100                   | 6.8             |
| As on the end of previous 3rd quarter | 100                   | 6.25            |
| As on the end of previous 4th quarter | 100                   | 6               |



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