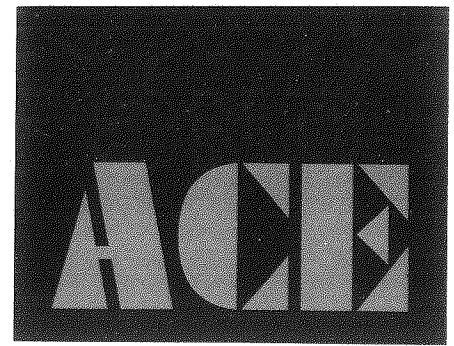


Action Construction Equipment Ltd.

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) | 31(1)(b) | |
| a. | If under 31(1)(b) then indicate the report for Quarter ending | 31/03/2025 | |
| 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 |

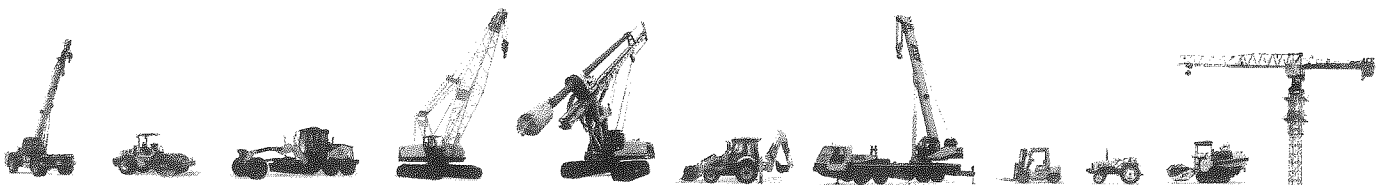
* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the 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

AP



www.ace-cranes.com

Table I - 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 Shares | Total nos. shares held (VII)=(IV)+(V)+(VI)+ VIIA | Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C2) | Number of Voting Rights held in each class of securities | | | Total as a % of (A+B+C) | No. of Outstanding Shares (including Warrants) | Shareholding, as a % conversion of convertible securities (as a percentage of diluted share capital) As a % of (A+B+C2) | Number of Shares Locked in shares | | Number of Shares pledged or otherwise encumbered | 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)+ VIIA | (VIII) | (IX) | | | (X) | (XI)=(VII)+(X) | (XII) | (XIII) | (XIV) | | |
| (A) | Promoter & Promoter Group | 5 | 77897463 | 0 | 0 | 77897463 | 65.41 | 77897463 | | 77897463.00 | 65.41 | 0 | 65.41 | | | 77897463 | |
| (B) | Public | 166867 | 41103377 | 0 | 0 | 41103377 | 34.52 | 41103377 | | 41103377.00 | 34.52 | 0 | 34.52 | | | 41094705 | |
| (C) | Non Promoter- Non Public | | | | | 0 | | | | | | | | | | | |
| (C1) | Shares underlying DRS | 0 | 0 | 0 | 0 | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0.00 | | | 0 | |
| (C2) | Shares held By Employee Trusts | 1 | 82356 | 0 | 0 | 82356 | 0.07 | 82356 | | 82356 | 0.07 | 0 | 0.07 | | | 82356 | |
| | Total | 166873 | 119083196 | 0 | 0 | 119083196 | 100.00 | 119083196 | | 119083196.00 | 100.00 | 0 | 100.00 | | | 119074524 | |

Registrar of Companies, India

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Table 11 - 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 share holder | No. of fully paid up equity shares held | Partly paid up equity shares held | Nos. of shares underlying Depository Receipts | Total nos. shares held (VII)=(IV)+(V)+(VI)+(VII) | 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 % assuming full conversion of securities (as a percentage of diluted share capital) | (XII) Locked in shares | (XIII) Number of Shares pledged or otherwise encumbered | (XIV) Number of equity shares held in dematerialized form | |
|---|--|-----|---------------------|---|-----------------------------------|---|--|--|--|---------|----------|--|--|------------------------|---|---|-------------------------------|
| | | | | | | | | | Class X | Class Y | Total | | | | | | Total as a % of Voting rights |
| (i) | | | | | | | | | (ix) | | | (x) | (xi) = (vii)+(x) | (xii) | (xiii) | (xiv) | |
| Indian | | | | | | | | | | | | | | | | | |
| (a) Individual/Hindu Undivided Family | | | 5 | 77897463 | 0 | 0 | 77897463 | 65.41 | 77897463 | 0 | 77897463 | 65.41 | 0 | 65.41 | | | 77897463 |
| VILAY AGARWAL | Promotor | | | 34236078 | 0 | 0 | 34236078 | 28.75 | 34236078 | 0 | 34236078 | 28.75 | 0 | 28.75 | | | 34236078 |
| MONA AGARWAL | Promotor | | | 29357579 | 0 | 0 | 29357579 | 24.65 | 29357579 | 0 | 29357579 | 24.65 | 0 | 24.65 | | | 29357579 |
| SORAB AGARWAL | Promotor | | | 7323650 | 0 | 0 | 7323650 | 6.15 | 7323650 | 0 | 7323650 | 6.15 | 0 | 6.15 | | | 7323650 |
| SURBHI GARG | Promotor | | | 6930156 | 0 | 0 | 6930156 | 5.82 | 6930156 | 0 | 6930156 | 5.82 | 0 | 5.82 | | | 6930156 |
| ANURADHA GARG | Promotor Group | | | 50000 | 0 | 0 | 50000 | 0.04 | 50000 | 0 | 50000 | 0.04 | 0 | 0.04 | | | 50000 |
| (b) Central Government/State Government(s) | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (c) Financial Institutions/Banks | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (d) Any Other (Specify) | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| Sub Total (A)(1) | | | 5 | 77897463 | 0 | 0 | 77897463 | 65.41 | 77897463 | 0 | 77897463 | 65.41 | 0 | 65.41 | | | 77897463 |
| 2 Foreign | | | | | | | 0 | 0.00 | | | 0 | 0.00 | | | | | |
| (a) Individual/Non Resident Individual/Foreign Individual | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (b) Government | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (c) Institutions | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (d) Foreign Portfolio Investor | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| (e) Any Other (Specify) | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| Sub Total (A)(2) | | | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0.00 | 0 | 0.00 | | | 0 |
| Total Shareholding of Promoter and Promoter Group (A) = (A)(1)+(A)(2) | | | 5 | 77897463 | 0 | 0 | 77897463 | 65.41 | 77897463 | 0 | 77897463 | 65.41 | 0 | 65.41 | | | 77897463 |

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Table III - Statement showing shareholding pattern of the Public shareholder

| # | Category & Name of the Shareholders | PAN | Nos. of shares older | No. of fully paid up equity shares held | Partly paid-up equity shares held | Nos. of shares underlying Depository Receipts | Total nos. shares held (VII)=(V)+(VI)+(VII) | Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) | Number of Voting Rights held in each class of securities | | | Total as a % of Voting rights | No. of Shares Underlying Outstanding convertible securities (including Warrants) | Total shareholding as a % assuming full conversion of convertible securities (as a percentage) | (XII) Number of Locked in shares | (XIII) Number of Shares pledged or otherwise held (Not applicable) | (XIV) Number of equity shares held in dematerialized form | Sub-categorization of shares (XV) | | | |
|-----|--|-----|----------------------|---|-----------------------------------|---|---|--|--|---------|-------|-------------------------------|--|--|----------------------------------|--|---|-----------------------------------|-----|-----|------------------|
| | | | | | | | | | Class X | Class Y | Total | | | | | | | (a) | (b) | (c) | Sub category (i) |
| | (I) Institutions Domestic | | | | | | | | (IX) | | | | | | | | | | | | |
| (a) | Mutual Fund | | 16 | 524271 | 0 | | 524271 | 0.44 | 524271 | 0 | 0.44 | 0 | 0.44 | 0 | 0.00 | 0.00 | 524271 | | | | |
| (b) | Venture Capital Funds | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (c) | Alternate Investment Funds | | 10 | 973327 | 0 | | 973327 | 0.82 | 973327 | 0 | 0.82 | 0 | 0.82 | 0 | 0.00 | 0.00 | 973327 | | | | |
| (d) | Banks | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (e) | Insurance Companies | | 8 | 836807 | 0 | | 836807 | 0.70 | 836807 | 0 | 0.70 | 0 | 0.70 | 0 | 0.00 | 0.00 | 836807 | | | | |
| (f) | Provident Fund/Pension Fund | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (g) | Asset Reconstruction | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (h) | Sovereign Wealth Fund | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (i) | NBFCs Registered with RBI | | 1 | 8319 | 0 | | 8319 | 0.01 | 8319 | 0 | 0.01 | 0 | 0.01 | 0 | 0.00 | 0.00 | 8319 | | | | |
| (j) | Other Financial Institutions | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (k) | Any Other Specity | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| 2 | Sub Total (B)(1) | | 35 | 2342724 | 0 | | 2342724 | 1.97 | 2342724 | 0 | 1.97 | 0 | 1.97 | 0 | 0.00 | 0.00 | 2342724 | | | | |
| | Institutions Foreign | | | | | | | 0.00 | | | 0.00 | | 0.00 | | 0.00 | 0.00 | | | | | |
| (a) | Foreign Direct Investment | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (b) | Foreign Venture Capital | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (c) | Sovereign Wealth Fund | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (d) | Foreign Portfolio Investors | | 141 | 13306621 | 0 | | 13306621 | 11.17 | 13306621 | 0 | 11.17 | 0 | 11.17 | 0 | 0.00 | 0.00 | 13306621 | | | | |
| | Category I | | | | | | | | | | | | | | | | | | | | |
| | MASSACHUSETTS INSTITUTE OF TECHNOLOGY | | | 2707745 | 0 | | 2707745 | 2.27 | 2707745 | 0 | 2.27 | 0 | 2.27 | 0 | 0.00 | 0.00 | 2707745 | | | | |
| | POLAR CAPITAL FUNDS PLC- EMERGING MARKET STARS FUND | | | 2399913 | 0 | | 2399913 | 2.02 | 2399913 | 0 | 2.02 | 0 | 2.02 | 0 | 0.00 | 0.00 | 2399913 | | | | |
| (e) | Foreign Portfolio Investors | | 15 | 477730 | 0 | | 477730 | 0.40 | 477730 | 0 | 0.40 | 0 | 0.40 | 0 | 0.00 | 0.00 | 477730 | | | | |
| | Category II | | | | | | | | | | | | | | | | | | | | |
| (f) | Overseas Depositories (holding DRs) (balancing figure) | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| (g) | Any Other (Specify) | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| | Sub Total (B)(2) | | 156 | 13784351 | 0 | | 13784351 | 11.58 | 13784351 | 0 | 11.58 | 0 | 11.58 | 0 | 0.00 | 0.00 | 13784351 | | | | |
| 3 | Central Government/State Government | | | | | | | 0.00 | | | 0.00 | | 0.00 | | 0.00 | 0.00 | | | | | |
| a | Central Government/President of India | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| b | State Government/Governor | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| c | State Government/Governor | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |
| | Sub Total (B)(3) | | 0 | 0 | 0 | | 0 | 0.00 | 0 | 0 | 0.00 | 0 | 0.00 | 0 | 0.00 | 0.00 | 0 | | | | |

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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 Depository Receipts | Total no. 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 | | | Total as a % of Total Voting rights | No. of Shares Underlying Outstanding convertible securities (including Warrants) | Total shareholding, as a % of conversion of convertible securities (as a percentage of diluted (VII)+(X)) | Number of Locked in shares | | Number of Shares pledged or otherwise | | Number of dematerialized equity shares held in form (not Applicable) |
|--|------|---------------------|---|-----------------------------------|------------------------------------|---|--|--|---------|-------|-------------------------------------|--|---|---------------------------------|----------------------|--|-------|--|
| | | | | | | | | Class X | Class Y | Total | | | | No. As a % of total Shares held | No. (Not applicable) | No. As a % of total shares held (Not applicable) | | |
| (i) | (ii) | (iii) | (iv) | (v) | (vi) | (vii)=(iv)+(v)+(vi) | (viii) | (ix) | | | (x) | (xi)=(x)/(vii) | (xii) | | (xiii) | | (xiv) | |
| C2 Employees Benefit Trust (Under SEBI (Share Based Employee Benefit Regulation 2014) | | 1 | 82356 | 0 | 0 | 82356 | 0.07 | 82356 | 0 | 82356 | 0.07 | 0.07 | 0 | 0.00 | 0 | 0.00 | 0 | 82356 |
| 1 ACTION CONSTRUCTION EQUIPMENT LIMITED EMPLOYEES WELFARE TRUS | | | 82356 | 0 | | 82356 | 0.07 | 82356 | | 82356 | 0.07 | 0 | 0.07 | 0 | 0.00 | 0 | 0.00 | 82356 |
| Total Non Promoter Non Public Shareholding (C)=(C1)+(C2) | | 1 | 82356 | 0 | 0 | 82356 | 0.07 | 82356 | 0 | 82356 | 0.07 | 0 | 0.07 | 0 | 0.00 | 0 | 0.00 | 82356 |

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Annexure B

Table VI - Statement showing foreign ownership limits

| As on shareholding date | Board approved limits | Limits utilized |
|---------------------------------------|-----------------------|-----------------|
| As on the end of previous 1st quarter | 100 | 12.69 |
| As on the end of previous 2nd quarter | 100 | 13.04 |
| As on the end of previous 3rd quarter | 100 | 11.62 |
| As on the end of previous 4th quarter | 100 | 11.3 |
| | | 10.52 |



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