

Action Construction Equipment Ltd.

Corporate & Regd. Office

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



An ISO 9001 Certified Co.

Format of Holding of Specified securities



1. Name of Listed Entity: ACTION CONSTRUCTION EQUIPMENT LIMITED
2. Scrip Code/Name of Scrip/Class of Security: 532762, ACE, EQUITY SHARES
3. Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg. 31(1)(c)
 - a. if under 31(1)(b) then indicate the report for quarter ending 30/09/2019
 - b. if under 31(1)(c) then indicate date of allotment/extinguishment
4. Declaration : The Listed entity is required to submit the following declaration to the extent of submission of information:

Particulars	YES*	NO*
a Whether the Listed Entity has issued any partly paid up shares	-	NO
b Whether the Listed Entity has issued any Convertible Securities or Warrants?	-	NO
c Whether the Listed Entity has any shares against which depository receipts are issued?	-	NO
d Whether the Listed Entity has any shares in locked-in?	-	NO
e 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.

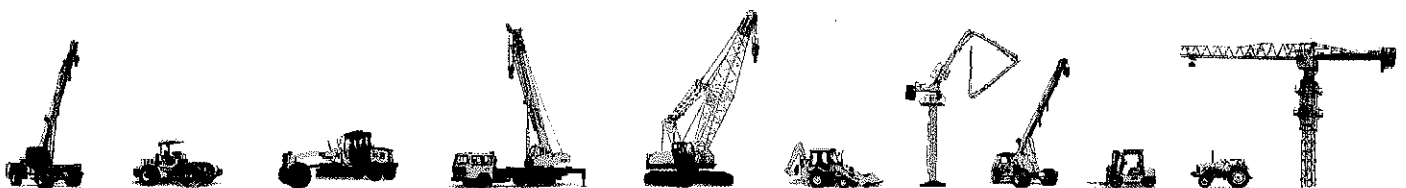
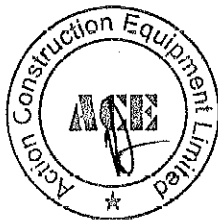
- 5 The tabular format for disclosure of holding of specified securities is as follows:

For Action Construction Equipment Limited

Anil Kumar

Anil Kumar

Company Secretary



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Table I - Summary Statement holding of specified securities

Category of Shareholder	No of Shareholders	No of fully paid up equity shares held	No of Partly paid-up equity shares held	No of Shares Underlying Depository Receipts	Total No of Shares Held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no of shares (As a % of (A+B+C 2))	Number of Voting Rights held in each class of securities					No of Voting Rights	Class X	Class Y Total	Total as a % of (A+B+C)	No of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding as a % assuming full conversion of convertible Securities (as a percentage of diluted share)	No. of Locked Shares	No. of other Shares	No. of other Shares	Number of equity shares held in dematerialized form
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)	(VIII)		(IX)							(X)	(XI)		(XII)	(XIII)	(XIV)
(A)	Promoter & Promoter Group	5	81871944	0	0	81871944	70.87	81871944	0	81871944	70.87					0	70.87	0	0.00	0	81871944
(B)	Public	32924	33647031	0	0	33647031	29.13	33647031	0	33647031	29.13					0	29.13	0	0.00	NA	33612730
(C)	Non Promoter-Non Public																				
(C1)	Shares underlying Depository Receipts	0	0	0	0	0	NA	0	0	0	0.00					0	NA	0	0.00	NA	0
(C2)	Shares held by Employees Trusts	0	0	0	0	0	0.00	0	0	0	0.00					0	0.00	0	0.00	NA	0
	Total:	32929	115518975	0	0	115518975	100.00	115518975	0	115518975	100.00					0	100.00	0	0.00	0	115484674

NOTE:-

(i) The Board of Directors in its meeting held on May 16, 2019, has approved the buyback of its fully paid-up equity shares of Rs.2 (Rupees Two) each ("Equity Shares") from open market through the stock exchange mechanism as prescribed under the Buyback Regulations and the Companies Act, for an amount not exceeding Rs. 34,25,00,000 and at a price not exceeding Rs. 125 ("Maximum Buyback Price") from the equity shareholders of the Company other than the promoters, members of the promoter group, persons acting in concert and persons who are control of the Company (the process hereinafter referred to as the "Buyback").

(ii) The Company has bought back 18,04,025 fully paid up equity shares of Rs. 2 each (in dematerialized form) from May 23, 2019 to August 31, 2019 and the same has been extinguished pursuant to Regulation 21 read with Regulation 11 of Buy Back Regulations; in view of the above, please note the following:

S.No.	PARTICULARS	No. of Equity Shares of Rs. 2/- each	Equity Share Capital (INR)
1	Issued, Subscribed and Paid-up Equity Share Capital (Prior to Buyback)	11,73,23,000	234646000
2	Less: Shares Extinguished from April 01 to June 30, 2019 in electronic form	3,45,802	691604
3	Less: Shares Extinguished from July 01 to September 30, 2019 in electronic form	14,58,223	2916446
4	Post Extinguishment, Issued, Subscribed and Paid-up Equity Share Capital	11,55,18,975	231037950



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

Category & Name of the Shareholder	PAN	No of Shares held	No of fully paid up equity shares held	No of equity shares held	No of Shares Underlying Depository Receipts	Total No of Shares Held (IV+V+VI)	Shareholding as a % of total no of shares held in each class of securities (calculate as per SCRR, 1957 (VIII) As a % of (A+B+C2)	No of Voting Rights held in each class of securities	Total as a % of	No of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (VII)+(X) As a % of	No. of Locked in Shares	As a % of total	No. of Shares pledged or otherwise encumbered	As a % of total	Number of equity shares held in dematerialized form
(1)	(II)	(III)	(IV)	(V)	(VI)	(VII)	(VIII)	(IX)	(X)	(XI)	(XII)	(XIII)	(XIV)	(XV)	(XVI)	(XVII)
(a) Indian Individual/Hindu undivided Family		5	81871944	0	0	81871944	70.87	81871944	0	81871944	70.87	0	0.00	0	0.00	81871944
MONA AGARWAL	AANPA659SR	1	25839407	0	0	25839407	22.37	25839407	0	25839407	22.37	0	0.00	0	0.00	25839407
YULAY AGARWAL	AAZPA6461C	1	41428731	0	0	41428731	35.86	41428731	0	41428731	35.86	0	0.00	0	0.00	41428731
SOBAB AGARWAL	AENPA0418H	1	7623650	0	0	7623650	6.60	7623650	0	7623650	6.60	0	0.00	0	0.00	7623650
SLJBH: GARG	AGTRG24151	1	6930156	0	0	6930156	6.00	6930156	0	6930156	6.00	0	0.00	0	0.00	6930156
ANIRADHA GARG	ACPG1653K	1	50000	0	0	50000	0.04	50000	0	50000	0.04	0	0.00	0	0.00	50000
(b) Central Government/State Government(s)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(c) Financial Institutions/Banks		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(d) Any Other		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(2) Sub-Total (A)(1)		5	81871944	0	0	81871944	70.87	81871944	0	81871944	70.87	0	0.00	0	0.00	81871944
(a) Individuals (Non-Resident Individuals/Foreign Individuals		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(b) Government Institutions		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(c) Foreign Portfolio Investor		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(d) Any Other		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
(e) Sub-Total (A)(2)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0
Total Shareholding of Promoter and Promoter Group (A)=(A)(1)+(A)(2)		5	81871944	0	0	81871944	70.87	81871944	0	81871944	70.87	0	0.00	0	0.00	81871944

Attested by



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

Category	Name of the Shareholder	PAN	No of Shareholders	No of fully paid up equity shares held	No of Partly paid-up equity shares held	No of Shares Underlying Depository Receipts	Total No of Shares Held (IV+V+VI)	Shareholding as a % of total no of shares (A+B+C2)	Number of Voting Rights	Shareholding as a % of total no of shares (A+B+C2)	No of Shares Underlying 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 encumbered	Number of equity shares held in dematerialized form
No of Voting Rights										Total as a % of					
Class											(x)	(xi)	(xii)	(xiii)	(xiv)
Total															
(1)	(i) Custodian/DR Holder	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)	(ix)						
			0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0
(2)	Employee Benefit Trust (under SEBI(Share based Employee Benefit) Regulations 2014)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	C
	Total Non-Promoter-Non Public Shareholding (C) = (C)(1)+(C)(2)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0

Director



Details of the shareholders acting as persons in Concert including their Shareholding:			
Name of Shareholder	Name of PAC	No of shares	Holding%
Total:		0	0

A. M. S. Prasad



Details of Shares which remain unclaimed may be given hear along with details such as number of shareholders,	
No of Shareholders	No of shares

