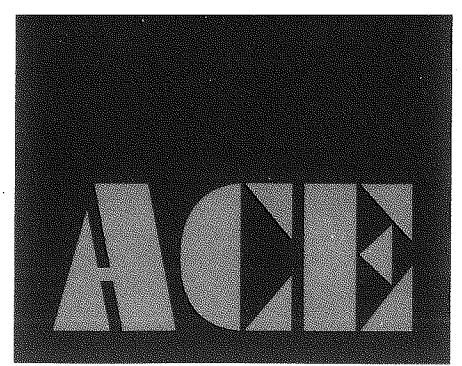


Action Construction Equipment Ltd.

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	31/12/2024	
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



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 shares underlying Depository Receipts	Total nos. shares held (VII)=(IV)+(V)+(VI)	Shareholding as a % of total shares (calculated as per SCRR, 1957) As a % of (A+B+C2)	Number of Voting Rights of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding, as a % assuming conversion of convertible securities as a percentage of diluted share capital) (XI)=(VII)+(X)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialized form
								Class: Equity	No of Voting Rights	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	77897463	0	0	77897463	65.41	77897463.00	65.41	0	0	0	77897463				
(B)	Public	162234	41107877	0	0	41107877	34.52	41107877.00	34.52	0	0	0	41099204				
(C)	Non Promoter- Non Public					0											
(C1)	Shares underlying DRs	0			0	0		0	0.00		0		0				
(C2)	Shares held by Employee Trusts	1	77856	0		77856	0.07	77856	0.07	0	0		77856				
	Total	162240	119083196	0	0	119083196	100.00	119083196.00	100.00	0	0	0	119074523				

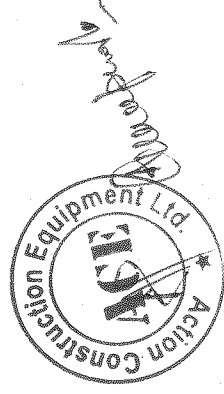


Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

#	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	No. of Partly paid-up equity shares held	No. of Nos. of shares underlying Depository Receipts	Total nos. shares held	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)	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 Total Voting rights			No. (a)	As a % of total shares held (b)	No. (a)	As a % of total shares held (b)	
										Class X	Class Y								
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)=(iv)+(v)+(vi)	(viii)	(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	0.00	0	0.00	0	77897463
	VIJAY AGARWAL	Promotor		34236078				34236078	28.75				28.75	0	0.00				34236078
	MONA AGARWAL	Promotor		29357579	0			29357579	24.65				24.65	0	0.00				29357579
	SORAB AGARWAL	Promotor		7323650	0			7323650	6.15				6.15	0	0.00				7323650
	SURBHI GARG	Promotor		6930156	0			6930156	5.82				5.82	0	0.00				6930156
	ANURADHA GARG	Promotor Group		50000	0			50000	0.04				0.04	0	0.00				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	0.00	0	0.00	0	77897463
2	Foreign								0.00				0.00		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	0.00	0	0.00	0	77897463



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Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders	PAN	Nos. of shareholder	No. of fully paid up equity shares held	Partly paid-up equity shares held	Nos. of Depository Receipts held	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C 2)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Total shareholding, as a % assuming full conversion of convertible securities (as a percentage of total shares)	Number of Locked in shares	Number of Shares pledged or otherwise		Number of equity shares held in dematerialized form	Sub-categorization of shares (XV)				
								Class X	Class Y	Total				No. (a)	As a % of total Shares held (b)		No. (Not applicable) (a)	As a % of total shares held (Not applicable) (b)	Sub category (i)	Sub category (ii)	Sub category (iii)
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)=(IV)+(V)+(VI)	(VIII)	(IX)			(X)	(XI)=(VII)+(X)	(XII)	(XIII)		(XIV)	(XV)				
#																					
	Institutions Domestic																				
(a)	Mutual Fund	12	448220	0	0	448220	0.38	448220	0.38	0	0.38	0	0.00	0	0.00	448220					
(b)	Venture Capital Funds	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(c)	Alternate Investment Funds	4	879212	0	0	879212	0.74	879212	0.74	0	0.74	0	0.00	0	0.00	879212					
(d)	Banks	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(e)	Insurance Companies	4	753519	0	0	753519	0.63	753519	0.63	0	0.63	0	0.00	0	0.00	753519					
(f)	Provident Fund/Pension Fund	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(g)	Asset Reconstruction	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(h)	Sovereign Wealth Fund	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(i)	NBFCs Registered with RBI	1	8319	0	0	8319	0.01	8319	0.01	0	0.01	0	0.00	0	0.00	8319					
(j)	Other Financial Institutions	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(k)	Any Other Specify	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
	Sub Total (B)(1)	21	2089270	0	0	2089270	1.75	2089270	1.75	0	1.75	0	0.00	0	0.00	2089270	0	0.00	0		
2	Institutions Foreign																				
(a)	Foreign Direct Investment	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(b)	Foreign Venture Capital	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(c)	Sovereign Wealth Fund	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(d)	Foreign Portfolio Investors	142	13783665	0	0	13783665	11.57	13783665	11.57	0	11.57	0	0.00	0	0.00	13783665					
	Category I																				
	MASSACHUSETTS INSTITUTE OF TECHNOLOGY		2750745	0	0	2750745	2.31	2750745	2.31	0	2.31	0	0.00	0	0.00	2750745					
	POLAR CAPITAL FUNDS PLC - EMERGING MARKET STARS FUND		2341794	0	0	2341794	1.97	2341794	1.97	0	1.97	0	0.00	0	0.00	2341794					
(e)	Foreign Portfolio Investors	11	387995	0	0	387995	0.33	387995	0.33	0	0.33	0	0.00	0	0.00	387995					
	Category II																				
(f)	Overseas Depositories (holding DRs) (balancing figure)	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
(g)	Any Other (Specify)	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
	Sub Total (B)(2)	153	14171660	0	0	14171660	11.90	14171660	11.90	0	11.90	0	0.00	0	0.00	14171660	0	0.00	0		
3	Central Government/State Government																				
a	Central Government/President of India	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
b	State Government/Governor	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
c	State Government/Governor	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0					
	Sub Total (B)(3)	0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0		

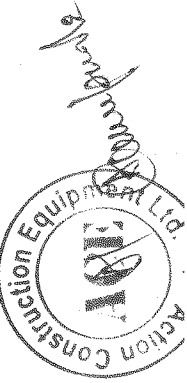


Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public Shareholder

Category & Name of the Shareholders	PAN	No. of shareholder	No. of fully paid up equity shares held	Partly paid-up equity shares held	Nos. of shares underlying Depository Receipts	Total no. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Total shareholding, e.g. as a % assuming full conversion of convertible securities (as a percentage of (VII)+(X))	Number of Locked in shares		Number of Shares pledged or otherwise		Number of equity shares held in dematerialized form (Not Applicable)
								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								
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)=(iv)+(v)+(vi)	(viii)	(ix)			(x)	(xi)=(vii)+(x)	(xii)	(xiii)	(xiv)		
C1 Custodian/DR Holder		0	0	0	0	0	-	0	0	0	0	0	0	0	0	0	
C2 Employees Benefit Trust (Under SEBI (Share Based Employee Benefit Regulation 2014)		1	77856	0	0	77856	0.07	77856	0	77856	0.07	0	0	0	0.00	0	77856
1 ACTION CONSTRUCTION EQUIPMENT LIMITED EMPLOYEES WELFARE TRUS			77856	0		77856	0.07	77856		77856	0.07	0	0	0	0.00		77856
Total Non Promoter Non Public Shareholding (C)=(C1)+(C2)		1	77856	0	0	77856	0.07	77856	0	77856	0.07	0	0	0	0.00		77856



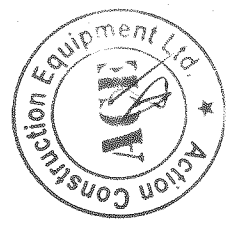
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Table V - Statement Showing Details of Significant beneficial Owners (SBOs)

Sr .No.	Details of the SBO		Details of the Registered Owner		Details of Holding/ exercise of right of the SBO in the reporting company, Whether direct or Indirect interest		Date of creation / acquisition of significant beneficial interest (IV)
	(I)		(II)		(III)		
	PAN/Passport No. in case of a foreign national	Nationality	Name	PAN/Passport No. in case of a foreign national	Nationality	Whether by Virtue of :	
					Shares	%	
					Voting Rights	%	
					Rights of distributable dividend or any other	%	
					Exercise of control		
					Exercise of significant influence		

* 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

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



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Annexure B

Table VI - Statement showing foreign ownership limits

	Board approved limits	Limits utilized
As on shareholding date	100	13.04
As on the end of previous 1st quarter	100	11.62
As on the end of previous 2nd quarter	100	11.3
As on the end of previous 3rd quarter	100	10.52
As on the end of previous 4th quarter	100	10.04



Annexure B