

**BSE Ltd.**  
Department of Corporate Services  
Corporate Relationship Department  
Phiroze Jee Jeebhoy, 25<sup>th</sup> Floor,  
Dalal Street, Mumbai- 400001

**15<sup>th</sup> April, 2025**

**Ref.: Company Code no. 531395 PADAMCO**

**Sub.: Intimation of submission of Application for Reclassification of Promoter/ Promoter Group from "Promoter" and "Promoter Group" category to "Public" category shareholders of the Company pursuant to Regulation 31A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations")**

Dear Sir/ Madam,

This is with reference with the captioned subject, and in compliance of Regulation 31A of SEBI LODR Regulations and amendment(s) thereto, we wish to inform you that informed that the Company has made an application on 15<sup>th</sup> April, 2025, for approval of the BSE Ltd. (BSE) for reclassification and removal from the list of "Promoter" and "Promoter Group" category to "Public" category under the provisions of the SEBI (LODR) Regulations, 2015 in respect of the following Promoters of the Company:

S. No.	Name of Promoter/ Promoter Group	No. of shares held	Percentage of the total equity
1.	Padam Sain Gupta	0	0
2.	Prem Lata	0	0
3.	Radhika Gupta	0	0
4.	Vivek Gupta	0	0
5.	Vivek Gupta HUF	0	0
6.	Rajev Gupta	0	0
7.	Rajev Gupta HUF	0	0
8.	Rekha Gupta	0	0
<b>Total</b>		<b>0</b>	<b>0</b>

Further, please note that approval/decision of Board of Directors in favour of reclassification already intimated vide letter dated 12<sup>th</sup> April, 2025 within the stipulate time.

The said announcement is also uploaded on the website of the Company.

Kindly take the same on your record and acknowledge receipt.

Thanking you.

Yours faithfully,

**For and behalf of Padam Cotton Yarns Limited**

**NEERAJ CHUGH**  
Digitally signed by  
NEERAJ CHUGH  
Date: 2025.04.15  
13:01:42 +05'30'

**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**

**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat

 cspcyl6@gmail.com  www.padamcotton.com  Regd. Office: 196, 1st Floor, G.T. Road, Opp. Red Cross Market, Karnal- 132001

CIN: L17112HR1994PLC033641

Date: 15.04.2025

To,  
**BSE Limited,**  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO**

**Sub: Regulation 31A (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015-  
Application for Reclassification of Promoters to Public category**

With reference to the captioned subject, We, Padam Cotton Yarns Limited, submitting the application of Reclassification of Promoters from Promoters / Promoter Group category to Public category under Regulation 31A (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with the following documents:

1. Application for Reclassification on Letter head of the company along with details of listing on other Exchange (if applicable).
2. Copy of Board Resolution approving the application of the promoter.
3. Latest Pre and Post Reclassification shareholding pattern.
4. Shareholding Pattern as on 31.03.2025.
5. Undertaking from the Company Secretary.
6. Letter from Promoter seeking reclassification from promoter to public inter-alia containing the rationale for seeking such re-classification and how conditions specified in clause 31A(3)(b) are satisfied.
7. Undertaking from Promoter seeking reclassification from promoter to public .
8. Self-Attested copy of PAN of Outgoing Promoters.
9. List of persons related to the promoter(s) seeking reclassification and list of Promoters post seeking reclassification.
10. Inter-se Relationship of Promoters seeking re-classification as per Regulation 2(1) (pp) of SEBI (ICDR), 2018.
11. Relationship of Promoters seeking Re-classification as per Regulation 2(1) (pp) of SEBI{ICDR}, 2018 with the Board of Directors
12. Chronology of Events including details of various disclosures related to reclassification made by the company.
13. Proof of Payment of Rs. 50,000 + GST (18%) towards Processing Fees.

We are enclosing BSE check list Regulation 31 A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and request you to give Promoters Reclassification approval at the earliest.

Yours faithfully,  
**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

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**List of details/ documents required for grant of approval for Reclassification of Promoters under Regulation 31A (3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

S. No.	Documents Submitted	Annexure Details
1.	Application for Reclassification on Letter head of the company along with details of listing on other Exchange (if applicable).	<b>Annexure-A</b>
2.	Copy of Board Resolution approving the application of the promoter	<b>Annexure-B</b>
3.	Latest Pre and Post Reclassification shareholding pattern.	<b>Annexure-C</b>
4.	Undertaking from the Company Secretary.	<b>Annexure-D</b>
5.	Letter from Promoter seeking reclassification from promoter to public inter-alia containing the rationale for seeking such re-classification and how conditions specified in clause 31A(3)(b) are satisfied.	<b>Annexure-E</b>
6.	Undertaking from Promoter seeking reclassification from promoter to public	<b>Annexure-F</b>
7.	List of persons related to the promoter(s) seeking reclassification and list of Promoters post seeking reclassification.	<b>Annexure-G</b>
8.	Inter-se Relationship of Promoters seeking re-classification as per Regulation 2(1) (pp) of SEBI (ICDR), 2018	<b>Annexure-H</b>
9.	Relationship of Promoters seeking Re-classification as per Regulation 2(1) (pp) of SEBI{ICDR}, 2018 with the Board of Directors	<b>Annexure-I</b>
10.	Chronology of Events including details of various disclosures related to reclassification made by the company	<b>Annexure-J</b>
11.	Proof of Payment of Rs. 50,000 + GST (18%) towards Processing Fees.	<b>Annexure-K</b>
12.	Self-Attested copy of PAN of Outgoing Promoters	<b>Annexure-L</b>

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

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CIN: L17112HR1994PLC033641

**Date: 15.04.2025**

To,  
**BSE Limited,**  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai- 400001

**Sub: Application for Reclassification under Listing Regulation 31A.**

The Company is in receipt of a request from promoter(s) of the Company, seeking reclassification as public under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.

In addition to BSE Limited, Company is also listed at 'no other exchange'.

Please find enclose herewith the details of RTGS/ NEFT Payment made towards processing fees of Rs. 50,000 + GST (18%).

We hereby request you to kindly process our application for reclassification of promoter as public under Regulation 31A of Listing Regulations 2015 and grant your approval.

In case of any query, please contact the following person:

**Name:** Neeraj Chugh

**Designation:** Company Secretary & Compliance Officer

**E-mail Id:** [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)

**Cell No.:** +91- 8383858860

Yours faithfully,

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.:** A61326  
**Email Id:** [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)  
**Contact number:** +91- 8383858860



**CERTIFIED TRUE COPY OF THE RESOLUTION PASSED BY THE BOARD OF DIRECTORS OF THE COMPANY PADAM COTTON YARNS LIMITED AT THEIR MEETING HELD ON FRIDAY, THE 11<sup>TH</sup> DAY OF APRIL, 2025, COMMENCED AT 03:00 P.M. AT REGISTERED OFFICE ADDRESS AT 196, 1<sup>ST</sup> FLOOR, OPP. RED CROSS BHAWAN, G.T. ROAD, KARNAL- 132001 AND CONCLUDED AT 05:15 P.M.**

The Board was apprised that Mr. Padam Sain Gupta, Mrs. Prem Lata, Mrs. Radhika Gupta, Mr. Vivek Gupta, Vivek Gupta HUF, Mr. Rajev Gupta, Rajev Gupta HUF and Mrs. Rekha Gupta, persons belonging to the 'promoter and promoter group' of the Company ("Outgoing Promoters"), had vide respective letter dated 8<sup>th</sup> April, 2025 requested the Company for reclassification from the 'promoter and promoter group' category to 'public' category shareholder of the Company ("Request Letters"). The Company intimated the aforesaid request(s) for re-classification to BSE Ltd. ("Stock Exchange") on 9<sup>th</sup> April, 2025 within 24 hours of receipt of Request Letters.

The Request Letters received from Outgoing Promoters were placed before the Board for its perusal.

The Board was informed that Mr. Padam Sain Gupta, Mrs. Prem Lata, Mrs. Radhika Gupta, Mr. Vivek Gupta, Vivek Gupta HUF, Mr. Rajev Gupta, Rajev Gupta HUF and Mrs. Rekha Gupta holds NIL (0 %) percentage of the paid-up share capital of the Company.

Further, the Board was also informed that Mr. Padam Sain Gupta, Mrs. Prem Lata, Mrs. Radhika Gupta, Mr. Vivek Gupta, Vivek Gupta HUF, Mr. Rajev Gupta, Rajev Gupta HUF and Mrs. Rekha Gupta vide their respective Request Letters have confirmed that they are:

1. Not controlling affairs of the Company directly or indirectly;
2. Not having special rights in the Company through formal or informal arrangements including through any shareholder agreements;
3. No representation on the Board of Directors (including not having nominee directors) of the Company;
4. Not acting as key managerial person in the Company;
5. Neither a wilful defaulter as per RBI Guidelines nor a fugitive economic offender.

Further, the Board was also apprised that Outgoing Promoters not holding any voting rights in the Company. Also, they were not involved in day-to-day affairs of the Company and were not playing role in the business decision or otherwise. The Board is requested to note that Outgoing Promoters are satisfying all the conditions specified in Regulation 31A (3) (b) of the Listing Regulations and undertake to comply that at all times from the date of such re-classification they will continue to comply with conditions mentioned in sub-clauses (i), (ii) and (iii) of Clause (b) of sub-regulation 3 of Regulation 31A and shall also with conditions mentioned sub-clause (iv) and (v) of clause (b) of sub-regulation (3) of Regulation 31A of the SEBI LODR Regulations, 2015 for a period of not less than three (3) years from the date of such reclassification.

Accordingly, on the basis of the rationale provided above and in accordance with the provisions of Regulation 31A of the Listing Regulations, the Board was of the view that the requests of Outgoing Promoters for re-classification from the 'promoter/promoter group' category to 'public' category be accepted and approved, which shall be subject to the approvals Stock Exchange, and/or such other approval, if any as may be necessary in this regard.

The Board was then requested to consider the said request for re-classification. The Board then considered and passed the following resolution: -

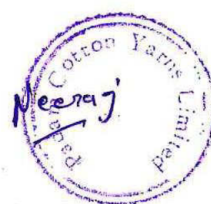
**“RESOLVED THAT** pursuant to provisions of Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended (“SEBI LODR Regulations”), including any statutory modification (s) or re-enactment thereof, for the time being in force and other applicable provisions, if any, Request Letters received from below mentioned persons (“Outgoing Promoters”) forming part of ‘Promoter/Promoter Group’ of the Company for reclassification of their shareholding to ‘public category’, as placed before the Board be and are hereby noted and taken on record.

S. No.	Name of Promoter/ Promoter Group	No. of shares held	Percentage of the total equity
1.	Padam Sain Gupta	0	0
2.	Prem Lata	0	0
3.	Radhika Gupta	0	0
4.	Vivek Gupta	0	0
5.	Vivek Gupta HUF	0	0
6.	Rajev Gupta	0	0
7.	Rajev Gupta HUF	0	0
8.	Rekha Gupta	0	0
<b>Total</b>		<b>0</b>	<b>0</b>

**RESOLVED FURTHER THAT** pursuant to Regulation 31A(3)(a)(ii) of SEBI LODR Regulations and subject to necessary approvals from the stock exchange where the shares of the Company are listed and any other appropriate statutory authorities, as may be necessary, and after analysing the reclassification Request Letters received from each above-mentioned persons, the consent of the Board be and is hereby accorded to proceed with the process of reclassification of shareholding of above mentioned persons forming part of Promoter and Promoter Group to public category.

**RESOLVED FURTHER THAT** the Board be and is hereby takes note that as required under the provisions of Regulation 31(A)(3)(b) of SEBI LODR Regulations, Outgoing Promoters have confirmed that they shall not:

- hold more than 10% of the fully paid-up equity share capital and voting capital of the Company;
- exercise control over the affairs of the listed entity directly or indirectly;
- have any special rights through formal or informal agreements and shareholding agreements, if any, granting special rights to them shall be terminated;
- be represented on the Board of Directors (including as a nominee director) of the Company for a period of more than 3 years from the date reclassification;
- act as a key managerial person for a period of more than 3 years from the date of reclassification;
- be a ‘wilful defaulter’ as per the Reserve Bank of India Guidelines;
- be a fugitive economic offender.



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and shall at all times from the date of such reclassification, shall continue to comply with conditions mentioned Regulation 31A of SEBI (LODR) Regulations, 2015 post reclassification from "Promoter & Promoter Group" to "Public".

**RESOLVED FURTHER THAT**, the Board be and is hereby takes note that as required under the provisions of Regulation 31(A)(3)(b) of SEBI LODR Regulations, the above-mentioned persons have further confirmed in their individual capacity that they are not 'wilful defaulter' as per the Reserve Bank of India Guidelines nor are they fugitive economic offender.

**RESOLVED FURTHER THAT** pursuant to provisions of 31A(3)(c) of SEBI LODR Regulations, the Board hereby confirms that:

- i. Company is and post reclassification will be compliant with the requirement for minimum public shareholding as required under Regulation 38 of SEBI LODR Regulations;
- ii. Trading in Company's shares has not been suspended by stock exchanges;
- iii. The Company does not have any outstanding dues to the Securities and Exchange Board of India, the stock exchanges or depositories.

**RESOLVED FURTHER THAT** any director of the Company and/ or Company Secretary and Compliance Officer of the Company be and are hereby severally authorized to do all such things and take all such steps and action including signing any application, document etc. on behalf of the Company that may be required to be submitted to stock exchanges/ any other regulatory authority and to complete all requisite formalities as may be necessary in this regard."

**Certified True Copy**

**For and Behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**

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**Date: 15.04.2025**

To,  
**BSE Limited,**  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO****Sub: Pre and Post Reclassification Shareholding Pattern of the Company- Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/Ma'am,

In reference to the captioned subject, below mentioned are the Pre and Post shareholding pattern details of the Company i.e. Padam Cotton Yarns Limited for Reclassification of Promoter(s):

Particulars	Promoters Holding	Percentage	Public Holding	Percentage
Pre Shareholding	NIL	NIL	12910000	100 %
Post Shareholding	NIL	NIL	12910000	100 %

This is for your information and records.

Thanking You.

**For and behalf of Padam Cotton Yarns Limited**

**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**



General information about company	
Scrip code	531395
NSE Symbol	NOTLISTED
MSEI Symbol	NOTLISTED
ISIN	INE448D01017
Name of the company	Padam Cotton Yarns Limited
Whether company is SME	No
Class of Security	Equity Shares
Type of report	Quarterly
Quarter Ended / Half year ended/Date of Report (For Prelisting / Allotment)	31-03-2025
Date of allotment / extinguishment (in case Capital Restructuring selected) / Listing Date	
Shareholding pattern filed under	Regulation 31 (1) (b)
Whether the listed entity is Public Sector Undertaking (PSU)?	No




Declaration					
Sr. No.	Particular	Yes/No	Promoter and Promoter Group	Public shareholder	Non Promoter- Non Public
1	Whether the Listed Entity has issued any partly paid up shares?	No	No	No	No
2	Whether the Listed Entity has issued any Convertible Securities ?	No	No	No	No
3	Whether the Listed Entity has issued any Warrants ?	No	No	No	No
4	Whether the Listed Entity has any shares against which depository receipts are issued?	No	No	No	No
5	Whether the Listed Entity has any shares in locked-in?	No	No	No	No
6	Whether any shares held by promoters are pledge or otherwise encumbered?	No	No		
7	Whether company has equity shares with differential voting rights?	No	No	No	No
8	Whether the listed entity has any significant beneficial owner?	No			




**Table VI - Statement showing foreign ownership limits**

Particular	Approved limits (%)	Limits utilized (%)
As on shareholding date	0	0
As on the end of previous 1st quarter	0	0
As on the end of previous 2nd quarter	0	0
As on the end of previous 3rd quarter	0	0
As on the end of previous 4th quarter	0	0




**Table I - Summary Statement holding of specified securities**

Category (I)	Category of shareholder (II)	Nos. Of shareholders (III)	No. of fully paid up equity shares held (IV)	No. Of Partly paid-up equity shares held (V)	No. Of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+ (V)+ (VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			
								No of Voting (XIV) Rights			Total as a % of (A+B+C)
								Class eg: X	Class eg: y	Total	
(A)	Promoter & Promoter Group		0			0	0	0		0	0
(B)	Public	4784	12910000			12910000	100	12910000		12910000	100
(C)	Non Promoter-Non Public										
(C1)	Shares underlying DRs										
(C2)	Shares held by Employee Trusts										
	Total	4784	12910000			12910000	100	12910000		12910000	100






**Table I - Summary Statement holding of specified securities**

Category (I)	Category of shareholder (II)	No. Of Shares Underlying Outstanding convertible securities (X)	No. of Shares Underlying Outstanding Warrants (Xi)	No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)	Sub-categorization of shares		
						No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)		Sub-category (i)	Sub-category (ii)	Sub-category (iii)
(A)	Promoter & Promoter Group				0					0			
(B)	Public				100					11206138	0	0	0
(C)	Non Promoter-Non Public												
(C1)	Shares underlying DRs												
(C2)	Shares held by Employee Trusts												
	Total				100					11206138	0	0	0




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

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group											
Sr.	Category & Name of the Shareholders (I)	Nos. Of shareholders (III)	No. of fully paid up equity shares held (IV)	No. Of Partly paid-up equity shares held (V)	No. Of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			
								No of Voting (XIV) Rights			Total as a % of Total Voting rights
								Class eg: X	Class eg:y	Total	
A	Table II - Statement showing shareholding pattern of the Promoter and Promoter Group										
(1)	Indian										
(a)	Individuals/Hindu undivided Family	0	0			0	0	0		0	0
Sub-Total (A)(1)			0			0	0	0		0	0
(2)	Foreign										
Total Shareholding of Promoter and Promoter Group (A)=(A)(1)+(A)(2)			0			0	0	0		0	0
B	Table III - Statement showing shareholding pattern of the Public shareholder										
(1)	Institutions (Domestic)										
(2)	Institutions (Foreign)										
(3)	Central Government / State Government(s)										
(4)	Non-institutions										
(g)	Resident Individuals holding nominal share capital up to Rs. 2 lakhs	4663	1800098			1800098	13.94	1800098		1800098	13.94
(h)	Resident Individuals holding nominal share capital in excess of Rs. 2 lakhs	56	6798123			6798123	52.66	6798123		6798123	52.66
(i)	Non Resident Indians (NRIs)	10	6367			6367	0.05	6367		6367	0.05
(l)	Bodies Corporate	16	1386424			1386424	10.74	1386424		1386424	10.74
(m)	Any Other (specify)	39	2918988			2918988	22.61	2918988		2918988	22.61
Sub-Total (B)(4)		4784	12910000			12910000	100	12910000		12910000	100
Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)+(B)(4)		4784	12910000			12910000	100	12910000		12910000	100
C	Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder										
Total ( A+B+C2 )		4784	12910000			12910000	100	12910000		12910000	100
Total (A+B+C )		4784	12910000			12910000	100	12910000		12910000	100




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

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group												
Sr.	No. Of Shares Underlying Outstanding convertible securities (X)	No. of Shares Underlying Outstanding Warrants (Xi)	No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)	Sub-categorization of shares		
					No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)		Sub-category (i)	Sub-category (ii)	Sub-category (iii)
A	Table II - Statement showing shareholding pattern of the Promoter and Promoter Group											
(1)	Indian											
(a)				0					0			
Sub-Total (A) (1)				0					0			
(2)	Foreign											
Total Shareholding of Promoter and Promoter Group (A)=(A) (1)+(A)(2)				0					0			
B	Table III - Statement showing shareholding pattern of the Public shareholder											
(1)	Institutions (Domestic)											
(2)	Institutions (Foreign)											
(3)	Central Government / State Government(s)											
(4)	Non-institutions											
(g)				13.94					1150336			
(h)				52.66					5764023	0	0	0
(i)				0.05					6367	0	0	0
(l)				10.74					1366424	0	0	0
(m)				22.61					2918988	0	0	0
Sub-Total (B) (4)				100					11206138	0	0	0
Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)+(B)(4)				100					11206138	0	0	0
C	Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder											
Total ( A+B+C2 )				100					11206138			
Total (A+B+C )				100					11206138			




Individuals/Hindu undivided Family							
Searial No.	1	2	3	4	5	6	7
Name of the Shareholders (I)	Padam Sain Gupta	Prem Lata	Radhika Gupta	Rajev Gupta	Vivek Gupta	Vivek Gupta HUF	Rekha Gupta
PAN (II)	AAPPG4043G	AADPL3023F	AAPPG4042H	AAPPG4046D	AAPPG4029A	AACHV1673G	AAPPG4033J
No. of fully paid up equity shares held (IV)	0	0	0	0	0	0	0
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	0	0	0	0	0	0	0
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	0	0	0	0	0	0	0
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	0	0	0	0	0	0	0
Class eg: y							
Total	0	0	0	0	0	0	0
Total as a % of Total Voting rights	0	0	0	0	0	0	0
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(Xi)(a) As a % of (A+B+C2)	0	0	0	0	0	0	0
Number of Locked in shares (XII)							
No. (a)							
As a % of total Shares held (b)							
Number of Shares pledged or otherwise encumbered (XIII)							
No. (a)							



As a % of total Shares held (b)							
Number of equity shares held in dematerialized form (XIV)	0	0	0	0	0	0	0
Reason for not providing PAN							
Reason for not providing PAN							
Shareholder type	Promoter	Promoter	Promoter	Promoter	Promoter	Promoter	Promoter

Neeraj



Individuals/Hindu undivided Family		
Serial No.	8	
Name of the Shareholders (I)	Rajev Gupta HUF	<a href="#">Click here to go back</a>
PAN (II)	AAFHR4485P	Total
No. of fully paid up equity shares held (IV)	0	0
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	0	0
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	0	0
Number of Voting Rights held in each class of securities (IX)		
Class eg: X	0	0
Class eg: y		
Total	0	0
Total as a % of Total Voting rights	0	0
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(Xi)(a) As a % of (A+B+C2)	0	0
Number of Locked in shares (XII)		
No. (a)		
As a % of total Shares held (b)		
Number of Shares pledged or otherwise encumbered (XIII)		
No. (a)		

As a % of total Shares held (b)		
Number of equity shares held in dematerialized form (XIV)	0	0
Reason for not providing PAN		
Reason for not providing PAN		
Shareholder type	Promoter	



Bodies Corporate		
Serial No.	1	
Name of the Shareholders (I)	Conchem Construction Private Limited	<a href="#">Click here to go back</a>
PAN (II)	AAACC5577B	Total
No. of fully paid up equity shares held (IV)	156999	156999
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	156999	156999
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1.22	1.22
Number of Voting Rights held in each class of securities (IX)		
Class eg: X	156999	156999
Class eg:y		
Total	156999	156999
Total as a % of Total Voting rights	1.22	1.22
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1.22	1.22
Number of Locked in shares (XII)		
No. (a)		
As a % of total Shares held (b)		



Number of equity shares held in dematerialized form (XIV)	156999	156999
Reason for not providing PAN		
Reason for not providing PAN		
Sub-categorization of shares		
Shareholding (No. of shares) under		
Sub-category (i)	0	0
Sub-category (ii)	0	0
Sub-category (iii)	0	0

Neeraj



<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Searial No.	1	2	3	4	5	6	7
Name of the Shareholders (I)	Anand Kumar Garg	Chetan Shantilal Shah	Ghanshyam Giluka	Hardik Jawaharbhair Mehta	Hirji Parbat Gada	Jasmin Purnachandra Mehta	Manjula Hirji Gada
PAN (II)	AGAPG8878Q	AABPS6839G	ALGPG8660D	AQGPM3585Q	AEJPG9811N	AJUPM6194J	AAMPG8653R
No. of fully paid up equity shares held (IV)	177446	333333	266333	787576	332123	489916	417203
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	177446	333333	266333	787576	332123	489916	417203
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1.37	2.58	2.06	6.1	2.57	3.79	3.23
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	177446	333333	266333	787576	332123	489916	417203
Class eg: y							
Total	177446	333333	266333	787576	332123	489916	417203
Total as a % of Total Voting rights	1.37	2.58	2.06	6.1	2.57	3.79	3.23
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1.37	2.58	2.06	6.1	2.57	3.79	3.23
Number of Locked in shares (XII)							
No. (a)							
As a % of total Shares held (b)							
Number of equity shares held in	177446	333333	266333	787576	332123	489916	417203

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dematerialized form (XIV)							
Reason for not providing PAN							
Reason for not providing PAN							
Sub-categorization of shares							
Sub-category (i)	0	0	0	0	0	0	0
Sub-category (ii)	0	0	0	0	0	0	0
Sub-category (iii)	0	0	0	0	0	0	0

Neeraj



<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Searial No.	8	9	10	11	12	13	14
Name of the Shareholders (I)	Niraj Rajnikant Shah	Pankaj Mittal	Ruchi Jiigar Karia	Sapna Mittal	Shilpa Sunil Majithia	Sneh Hirji Gada	Sunil Shantikumar Majithia
PAN (II)	AJLPS4690J	AAAPM1211F	AXBPG8841P	AAIPM7124P	AAFPM7765B	AKLPG2111R	AAJPM7158G
No. of fully paid up equity shares held (IV)	371840	333333	290373	243333	173100	293306	300000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	371840	333333	290373	243333	173100	293306	300000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	2.88	2.58	2.25	1.88	1.34	2.27	2.32
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	371840	333333	290373	243333	173100	293306	300000
Class eg:y							
Total	371840	333333	290373	243333	173100	293306	300000
Total as a % of Total Voting rights	2.88	2.58	2.25	1.88	1.34	2.27	2.32
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	2.88	2.58	2.25	1.88	1.34	2.27	2.32
Number of Locked in shares (XII)							
No. (a)							
As a % of total Shares held (b)							
Number of equity shares held in	371840	333333	290373	243333	173100	293306	300000

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dematerialized form (XIV)							
Reason for not providing PAN							
Reason for not providing PAN							
Sub-categorization of shares							
Sub-category (i)	0	0	0	0	0	0	0
Sub-category (ii)	0	0	0	0	0	0	0
Sub-category (iii)	0	0	0	0	0	0	0

*Neeraj*



<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>	
Serial No.	
Name of the Shareholders (I)	<a href="#">Click here to go back</a>
PAN (II)	Total
No. of fully paid up equity shares held (IV)	4809215
No. Of Partly paid-up equity shares held (V)	
No. Of shares underlying Depository Receipts (VI)	
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	4809215
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	37.25
Number of Voting Rights held in each class of securities (IX)	
Class eg: X	4809215
Class eg: y	
Total	4809215
Total as a % of Total Voting rights	37.25
No. Of Shares Underlying Outstanding convertible securities (X)	
No. of Shares Underlying Outstanding Warrants (Xi)	
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)	
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	37.25
Number of Locked in shares (XII)	
No. (a)	
As a % of total Shares held (b)	

Number of equity shares held in dematerialized form (XIV)	4809215
Reason for not providing PAN	
Reason for not providing PAN	
Sub-categorization of shares	
Shareholding (No. of shares) under	
Sub-category (i)	0
Sub-category (ii)	0
Sub-category (iii)	0





Any Other (specify)		
Serial No.	1	
Category	Unclaimed or Suspense or Escrow Account	
Category / More than 1 percentage	Category	
Name of the Shareholders (I)		<a href="#">Click here to go back</a>
PAN (II)		Total
No. of the Shareholders (I)	1	1
No. of fully paid up equity shares held (IV)	2848103	2848103
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	2848103	2848103
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	22.06	22.06
Number of Voting Rights held in each class of securities (IX)		
Class eg: X	2848103	2848103
Class eg:y		
Total	2848103	2848103
Total as a % of Total Voting rights	22.06	22.06
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	22.06	22.06
Number of Locked in shares (XII)		

No. (a)		
As a % of total Shares held (b)		
Number of equity shares held in dematerialized form (XIV)	2848103	2848103
Reason for not providing PAN		
Reason for not providing PAN		
Sub-categorization of shares		
Shareholding (No. of shares) under		
Sub-category (i)	0	0
Sub-category (ii)	0	0
Sub-category (iii)	0	0





**Undertaking by the Company Secretary for Reclassification under Reg. 31A of Listing Regulation**

**Date: 15.04.2025**

To,  
BSE Ltd.  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai-400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

With relation to our application for reclassification of promoter shareholders, we hereby confirm and certify that:

1. Outgoing Promoter(s) and persons related to the promoter(s) do not together hold more than Ten percent of the total voting rights in the Company.
2. Post reclassification, the Outgoing promoter(s) will not exercise direct or indirect control over the affairs of the Company.
3. All special rights of the Outgoing Promoter(s) which were acquired by virtue of any shareholder agreements have been terminated.
4. Outgoing Promoter(s) will not be represented on the Board of Directors (including a Nominee Director) of the Company for a period of not less than three years from the date of such reclassification.
5. Outgoing Promoter(s) will not act as a key managerial person in the Company for a period of not less than three years from the date of such reclassification.
6. The company, its promoters, its directors are not in violation of the restrictions imposed by SEBI under SEBI circular no. SEBI/HO/ MRD/DSA/CIR/P/2017/92 dated August 01, 2017.
7. That the company or its promoters or whole-time directors are not in violation of the provisions of Regulation 34 of the SEBI (Delisting of Equity Shares) Regulations, 2021.
8. Outgoing Promoter(s) are not a wilful defaulter as per the Reserve Bank of India Guidelines.
9. Outgoing Promoter(s) are not a fugitive economic offender.
10. That the company is compliant with the requirement for minimum public shareholding as required under Regulation 38 of SEBI (Listing Obligation and Disclosure Requirement) and the proposed reclassification is not being initiated for achieving the Minimum Public Shareholding.
11. That trading in the shares of the company has not been suspended by the stock Exchanges.



**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat



cspcyl6@gmail.com



www.padamcotton.com



Regd. Office: 196, 1st Floor, G.T. Road, Opp. Red Cross Market, Karnal- 132001

CIN: L17112HR1994PLC033641

12. That the Company does not have any outstanding dues to the SEBI, the Stock Exchanges or Depositories.
13. In case the promoter(s) seeking re-classification fails to comply with the provision of sub-clause (i), (ii), (iii), (iv) and (v) of clause (b) of Regulation 31A(3), they shall be reclassified as promoter/persons belonging to promoter group, as stated in regulation 31A(4). The same will be intimated to the Exchange as soon as possible.
14. Promoter(s) seeking reclassification and persons related to reclassification have not voted to approve on the resolution for reclassification.
15. There is no pending regulatory action against promoter(s) seeking re-classification.

Yours faithfully,

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM SAIN GUPTA**

Address: H. No. 831, Sector-13,  
Urban Estate, Karnal-132001, Haryana

Date: 08.04.2025

**The Board of Directors****Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Padam Sain Gupta was the shareholder of the company, and currently I am classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Padam Sain Gupta	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

- In this regard, hereby confirm and undertake as follows:
  - Do not hold more than ten percent of the total voting rights of the Company.
  - Do not exercise control over the affairs of the company, directly or indirectly.
  - Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - I am not being represented on the board of directors (including not having a nominee director) of the Company.
  - Do not act as a key managerial person of the Company.
  - I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
  - I am not fugitive economic offender.
- There is no pending regulatory action against me.



**PADAM SAIN GUPTA**

**Address: H. No. 831, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,



**Padam Sain Gupta**

**Promoter**

**PAN: AAPPG4043G**

**Contact No.: 9896347831**

**Email: padamsaing@gmail.com**





**PREM LATA**

Address: H. No. 831, Sector-13,  
Urban Estate, Karnal-132001, Haryana

Date: 08.04.2025

**The Board of Directors****Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Prem Lata was the shareholder of the company, and currently I am classified under category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Prem Lata	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against me.



**PREM LATA**

**Address: H. No. 831, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,

**Prem Lata**

**Promoter**

**PAN: AADPL3023F**

**Contact No.: 9729073404**



**RADHIKA GUPTA**

**Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

Date: 08.04.2025

**The Board of Directors**

**Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Radhika Gupta was the director and shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Radhika Gupta	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against me.

*Neeraj*



**RADHIKA GUPTA**

**Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,

**Radhika Gupta**

**Promoter**

**PAN: AAPPG4042H**

**Contact No.: 9034453030**

**Email: gradhika580@gmail.com**



**VIVEK GUPTA**

**Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

Date: 08.04.2025

**The Board of Directors**

**Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Vivek Gupta was the director and shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Vivek Gupta	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against me.

*Neraj*





**VIVEK GUPTA**

**Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,



**Vivek Gupta**

**Promoter**

**PAN: AAPPG4029A**

**Contact No.: 9812006085**

**Email: vivek@oswalpumps.com**



**VIVEK GUPTA (HUF)**

Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana

Date: 08.04.2025

**The Board of Directors****Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

We, Vivek Gupta (HUF) was shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date we do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	No. of shares held Currently	Percentage
Vivek Gupta (HUF)	Promoter	NIL	NIL

**B. Request for re-classification:**

We have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since we are not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against us.





**VIVEK GUPTA (HUF)**

**Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

3. We shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, we shall be re-classified as person belonging to the promoter of the company.
4. We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, we shall be reclassified as person belonging to promoter of the company.

We, request you to re-classify our status from Promoter category to Public category.

We, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of our name from Promoter to Public.

Thanking You.

Your Sincerely,

VIVEK GUPTA (HUF)  
  
KARTA

**Vivek Gupta Karta of  
Promoter  
PAN: AACHV1673G  
Contact No.: 9812006085  
Email: vivek@oswalpumps.com**





**RAJEV GUPTA**

**Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana, India**

Date: 08.04.2025

**The Board of Directors**

**Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Rajev Gupta was the director and shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Rajev Gupta	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

*Rajev*



**RAJEV GUPTA**

**Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana, India**

2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,



**Rajev Gupta**

**Promoter**

**PAN: AAPPG4046D**

**Contact No.: 9812006068**

**Email: rajevgupta871@gmail.com**



**RAJEV GUPTA (HUF)**

Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana, India

Date: 08.04.2025

**The Board of Directors****Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

We, Rajev Gupta (HUF) was shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date we do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	No. of shares held Currently	Percentage
Rajev Gupta (HUF)	Promoter	NIL	NIL

**B. Request for re-classification:**

We have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since we are not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against us.





**RAJEV GUPTA (HUF)**

**Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana, India**

3. We shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, we shall be re-classified as person belonging to the promoter of the company.
4. We shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, we shall be reclassified as person belonging to promoter of the company.

We, request you to re-classify our status from Promoter category to Public category.

We, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of our name from Promoter to Public.

Thanking You.

Your Sincerely,

RAJEV GUPTA (HUF)  
*Rajev Gupta*  
KARTA

**Rajev Gupta Karta of  
Rajev Gupta (HUF)  
Promoter  
PAN: AAFHR4485P  
Contact No.: 9812006068  
Email: rajevgupta871@gmail.com**

*Neeraj*



**REKHA GUPTA**

**Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

Date: 08.04.2025

**The Board of Directors**

**Padam Cotton Yarns Limited**

196, 1<sup>st</sup> Floor, G.T. Road,  
Opp. Red Cross Market, Karnal- 132001

Dear Sir/Madam,

**Sub: Request letter for seeking approval of Re-classification from Promoter category to Public category of Padam Cotton Yarns Limited**

**Ref: Re-classification under Regulation 31A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR") from Promoter category to Public category of Padam Cotton Yarns Limited (the "Company")**

**A. Background and Current Status:**

I, Rekha Gupta was the director and shareholder of the company, and currently classified under the category of "Promoter" of the Company as per Definition of Promoter in Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018. As on date I do not hold any number of equity shares in the Company. Below mentioned details are showing the current status:

Name	Category	Current Directorship in the Company	No. of shares held Currently	Percentage
Rekha Gupta	Promoter	None	NIL	NIL

**B. Request for re-classification:**

I have been mentioned as a "Promoter" of your Company and request you to re-classify the status from "Promoter" to "Public Category", since I am not connected directly or indirectly whatsoever, with any activity of the Company nor have any direct or indirect control over the affairs or the decision-making process of your Company.

**C. Undertaking:**

1. In this regard, hereby confirm and undertake as follows:

- Do not hold more than ten percent of the total voting rights of the Company.
- Do not exercise control over the affairs of the company, directly or indirectly.
- Do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
- I am not being represented on the board of directors (including not having a nominee director) of the Company.
- Do not act as a key managerial person of the Company.
- I am not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
- I am not fugitive economic offender.

2. There is no pending regulatory action against me.

*Neraj*



**REKHA GUPTA**

**Address: H. No. 871, Sector-13,  
Urban Estate, Karnal-132001, Haryana**

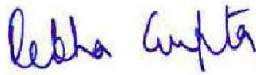
3. I shall continue to comply with the conditions mentioned at sub clauses (i), (ii) and (iii) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be re-classified as person belonging to the promoter of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A (3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three (3) years from the date of re-classification, failing which, I shall be reclassified as person belonging to promoter of the company.

I, request you to re-classify my status from Promoter category to Public category.

I, also undertake to abide by the conditions listed in Regulation 31A of the SEBI LODR Regulation 2015 post such re-classification of my name from Promoter to Public.

Thanking You.

Your Sincerely,



**Rekha Gupta**

**Promoter**

**PAN: AAPPG4033J**

**Contact No.: 9896111821**

**Email: rekhagupta4144@gmail.com**





**PADAM SAIN GUPTA**  
Address: H. No. 831, Sector-13,  
Urban Estate, Karnal-132001, Haryana

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,



**Padam Sain Gupta**  
**Promoter**  
**PAN: AAPPG4043G**  
**Contact No.: 9896347831**  
**Email: padamsaing@gmail.com**



**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,

**Prem Lata**  
**Promoter**  
**PAN: AADPL3023F**  
**Contact No.: 9729073404**



**RADHIKA GUPTA**  
Address: H. No. 836, Sector-13,  
Urban Estate, Karnal-132001, Haryana

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,

**Radhika Gupta**  
**Promoter**  
**PAN: AAPPG4042H**  
**Contact No.: 9034453030**  
**Email: gradhika580@gmail.com**



**VIVEK GUPTA (HUF)**  
**Address: H. No. 836, Sector-13,**  
**Urban Estate, Karnal-132001, Haryana**

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,

**VIVEK GUPTA (HUF)**  
  
**Vivek Gupta Karta of**  
**Vivek Gupta (HUF)**  
**Promoter**  
**PAN: AACHV1673G**  
**Contact No.: 9812006085**  
**Email: [vivek@oswalpumps.com](mailto:vivek@oswalpumps.com)**





**VIVEK GUPTA**  
**Address: H. No. 836, Sector-13,**  
**Urban Estate, Karnal-132001, Haryana**

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company
  - e. do not act as a key managerial person of the Company
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines
  - g. are not fugitive economic offender
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,



**Vivek Gupta**  
**Promoter**  
**PAN: AAPPG4029A**  
**Contact No.: 9812006085**  
**Email: vivek@oswalpumps.com**





**RAJEV GUPTA**  
**Address: H. No. 871, Sector-13,**  
**Urban Estate, Karnal-132001, Haryana, India**

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company.
  - e. do not act as a key managerial person of the Company.
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
  - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,



**Rajev Gupta**  
**Promoter**

**PAN: AAPPG4046D**

**Contact No.: 9812006068**

**Email: rajevgupta871@gmail.com**



**RAJEV GUPTA (HUF)**  
**Address: H. No. 871, Sector-13,**  
**Urban Estate, Karnal-132001, Haryana, India**

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having an nominee director) of the Company.
  - e. do not act as a key managerial person of the Company.
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
  - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,

**RAJEV GUPTA (HUF)**  
*Rajev Gupta*  
**KARTA**

**Rajev Gupta Karta of**  
**Rajev Gupta (HUF)**  
**Promoter**  
**PAN: AAFHR4485P**  
**Contact No.: 9812006068**  
**Email: rajevgupta871@gmail.com**

*Neeraj*



**REKHA GUPTA**  
**Address: H. No. 871, Sector-13,**  
**Urban Estate, Karnal-132001, Haryana**

**Undertaking from promoter(s) seeking reclassification**

**Date: 08.04.2025**

To,  
**BSE Ltd.**  
The Deputy General Manager,  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai -400001

**Sub: Application for Reclassification under Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations (Listing Regulations), 2015**

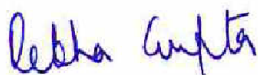
Dear Sir / Madam,

In connection with application for reclassification, I hereby confirm and certify that:

1. I, along with persons related to me together:
  - a. do not hold more than ten percent of the total voting rights in the company.
  - b. do not exercise control over the affairs of the company, directly or indirectly.
  - c. do not have any special rights with respect to the company through formal or informal arrangements including through any shareholder agreements.
  - d. are not being represented on the board of directors (including not having a nominee director) of the Company.
  - e. do not act as a key managerial person of the Company.
  - f. are not 'wilful defaulter(s)' as per the Reserve Bank of India Guidelines.
  - g. are not fugitive economic offender.
2. There is no pending regulatory action against me.
3. I shall continue to comply with the conditions mentioned at sub-clauses (i), (ii) and (iii) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 at all times from the date of re-classification, failing which, I shall be reclassified as promoter/person belonging to the promoter group of the company.
4. I shall comply with the conditions mentioned in the of sub-clauses (iv) and (v) of clause (b) of Regulation 31A(3) of SEBI (Listing Obligation and Disclosure Requirements), Regulations, 2015 for a period of not less than three years from the date of reclassification, failing which, I shall be reclassified as promoter/person belonging to promoter group of the company.

Thanking You.

Your Sincerely,



**Rekha Gupta**  
**Promoter**  
**PAN: AAPPG4033J**  
**Contact No.: 9896111821**  
**Email: rekha Gupta4144@gmail.com**







**Date: 15.04.2025**

To,  
**BSE Limited,**  
 Listing Compliance Monitoring Cell,  
 24<sup>th</sup> Floor, P.J. Towers,  
 Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO**  
**Sub: List of Promoters Seeking Reclassification**

Dear Sir/Ma'am,

In reference to the captioned subject, below mentioned are the list of promoter(s) seeking reclassification and list of Promoter(s) post reclassification:

**List of Promoter(s) seeking Reclassification:**

S. No.	Name of Promoter/ Promoter Group	No. of shares held	Percentage of the total equity
1.	Padam Sain Gupta	0	0
2.	Prem Lata	0	0
3.	Radhika Gupta	0	0
4.	Vivek Gupta	0	0
5.	Vivek Gupta HUF	0	0
6.	Rajev Gupta	0	0
7.	Rajev Gupta HUF	0	0
8.	Rekha Gupta	0	0
<b>Total</b>		<b>0</b>	<b>0</b>

**List of Promoter(s) post Reclassification:**

S. No.	Name of Promoter/ Promoter Group	No. of shares held	Percentage of the total equity
1.	NIL	NIL	NIL

This is for your information and records.

Thanking You.

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat

 [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)  [www.padamcotton.com](http://www.padamcotton.com)  Regd. Office: 196, 1st Floor, G.T. Road, Opp. Red Cross Market, Karnal- 132001

CIN: L17112HR1994PLC033641

**Date: 15.04.2025**

To,  
**BSE Limited,**  
 Listing Compliance Monitoring Cell,  
 24<sup>th</sup> Floor, P.J. Towers,  
 Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO**

**Sub: Inter-se Relationship of Promoters seeking re-classification as per Regulation 2(1) (pp) of SEBI (ICDR). 2018**

Dear Sir/Ma'am,

With reference to the above-mentioned subject, we would like to state the inter-se relationship of Promoters seeking reclassification, which is being mentioned herein:

S. No.	Name of Promoter	Relationship
1.	Padam Sain Gupta	<ul style="list-style-type: none"> <li>• Husband of Prem Lata</li> <li>• Father of Rajev Gupta and Vivek Gupta</li> <li>• Father-in-Law of Rekha Gupta and Radhika Gupta</li> <li>• Rajev Gupta HUF- No Relation</li> <li>• Vivek Gupta HUF- No Relation</li> </ul>
2.	Prem Lata	<ul style="list-style-type: none"> <li>• Wife of Padam Sain Gupta</li> <li>• Mother of Rajev Gupta and Vivek Gupta</li> <li>• Mother-in-Law of Rekha Gupta and Radhika Gupta</li> <li>• Rajev Gupta HUF- No Relation</li> <li>• Vivek Gupta HUF- No Relation</li> </ul>
3.	Radhika Gupta	<ul style="list-style-type: none"> <li>• Wife of Vivek Gupta</li> <li>• Daughter-in-Law of Padam Sain Gupta and Prem Lata</li> <li>• Sister-in-Law of Rekha Gupta and Rajev Gupta</li> <li>• Rajev Gupta HUF- No Relation</li> <li>• Member of Vivek Gupta HUF</li> </ul>
4.	Vivek Gupta	<ul style="list-style-type: none"> <li>• Son of Padam Sain Gupta and Prem Lata</li> <li>• Husband of Radhika Gupta</li> <li>• Brother of Rajev Gupta</li> <li>• Brother-in-Law of Rekha Gupta</li> <li>• Rajev Gupta HUF- No Relation</li> <li>• Karta of Vivek Gupta HUF</li> </ul>
5.	Vivek Gupta HUF	<ul style="list-style-type: none"> <li>• Vivek Gupta- Karta</li> <li>• Radhika Gupta- Member</li> <li>• Padam Sain Gupta- No Relation</li> <li>• Prem Lata- No Relation</li> <li>• Rajev Gupta- No Relation</li> <li>• Rekha Gupta- No Relation</li> <li>• Rajev Gupta HUF- No Relation</li> </ul>



**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat



cspcyl6@gmail.com



www.padamcotton.com



Regd. Office: 196, 1st Floor, G.T. Road, Opp. Red Cross Market, Karnal- 132001

CIN: L17112HR1994PLC033641

The above mentioned	6.	Rajev Gupta	<ul style="list-style-type: none"> <li>• Son of Padam Sain Gupta and Prem Lata</li> <li>• Husband of Rekha Gupta</li> <li>• Brother of Vivek Gupta</li> <li>• Brother-in-Law of Radhika Gupta</li> <li>• Karta of Rajev Gupta HUF</li> <li>• Vivek Gupta HUF- No Relation</li> </ul>
	7.	Rajev Gupta HUF	<ul style="list-style-type: none"> <li>• Rajev Gupta- Karta</li> <li>• Rekha Gupta- Member</li> <li>• Padam Sain Gupta- No Relation</li> <li>• Prem Lata- No Relation</li> <li>• Rajev Gupta- No Relation</li> <li>• Rekha Gupta- No Relation</li> <li>• Vivek Gupta HUF- No Relation</li> </ul>
	8.	Rekha Gupta	<ul style="list-style-type: none"> <li>• Wife of Rajev Gupta</li> <li>• Daughter-in-Law of Padam Sain Gupta and Prem Lata</li> <li>• Sister-in-Law of Radhika Gupta and Vivek Gupta</li> <li>• Member of Rajev Gupta HUF</li> <li>• Vivek Gupta HUF- No Relation</li> </ul>

d promoters fulfill all the conditions as per Regulation 31A (3) (b) which is required for reclassification of promoters from "Promoter and Promoter Group Category" to "Public Category".

Thanking You.

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcy16@gmail.com](mailto:cspcy16@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat

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CIN: L17112HR1994PLC033641

**Date: 15.04.2025**

To,  
**BSE Limited,**  
 Listing Compliance Monitoring Cell,  
 24<sup>th</sup> Floor, P.J. Towers,  
 Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO**
**Sub: Relationship of Promoters seeking Re-classification with the Board of Directors as per Regulation 2(1) (pp) of SEBI (ICDR), 2018**

Dear Sir/Ma'am,

With reference to the above-mentioned subject, we would like to state the relationship of Promoters seeking re-classification with the Board of Directors of the Company, which is being mentioned herein:

S. No.	Name of Outgoing Promoter	Mahendra Singh	Ashutosh Alaru	Anand Manoharlal Kothari	Nikita Kushan Karia
1.	Padam Sain Gupta	No Relation			
2.	Prem Lata	No Relation			
3.	Radhika Gupta	No Relation			
4.	Vivek Gupta	No Relation			
5.	Vivek Gupta HUF	No Relation			
6.	Rajev Gupta,	No Relation			
7.	Rajev Gupta HUF	No Relation			
8.	Rekha Gupta	No Relation			

This is for your information and records.

Thanking You.

**For and behalf of Padam Cotton Yarns Limited**


**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**

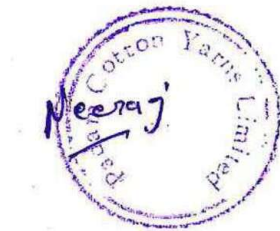


**Date: 15.04.2025**

**Chronology of Events for Reclassification under Regulation 31A of SEBI (LODR) Regulations, 2015**

Sr. No.	Particulars	Date of the Event
1	Receipt of Application by the Promoter to the Company along with requisite undertaking.	8 <sup>th</sup> April, 2025
2	Submission of intimation within 24 hours of request received from promoter by the Company to the Exchange.	9 <sup>th</sup> April, 2025
3	Date of Board meeting wherein reclassification matter is considered and approved.	11 <sup>th</sup> April, 2025
4	Submission of Extract of Minutes of the BOD meeting wherein the proposal of the promoter seeking reclassification has been considered.	12 <sup>th</sup> April, 2025
5	Submission of reclassification application with the Stock Exchange.	15 <sup>th</sup> April, 2025
6.	Intimation to the Exchange within 24 hours of submission of application for re-classification of status as promoter/public by the listed entity to the stock exchanges	15 <sup>th</sup> April, 2025

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM COTTON YARNS LIMITED**

Corporate Office : C-801, 8th Floor, Krish Cubical, Sindhu Bhavan Marg, Thaltej, Ahmedabad-380059, Gujarat

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 [www.padamcotton.com](http://www.padamcotton.com)
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CIN: L17112HR1994PLC033641

**Date: 15.04.2025**
**Details of Proof of Payment**

<b>Company Name</b>	Padam Cotton Yarns Limited		
<b>Name of Stock Exchange</b>	BSE Ltd.		
<b>Bank &amp; Account No.</b>	ICICI Bank Limited BSEL07664		
<b>Fees Particulars</b>	Application / Processing Fees towards Reclassification of Promoter(s) / Promoter Group Category to Public Category		
<b>Category</b>	<b>Base Value (Rs.)</b>	<b>GST Value (Rs.)</b>	<b>Total (Rs.)</b>
<b>Fees Amount</b>	50,000	9,000	59,000
<b>TDS</b>	(5,000)	-	(5,000)
<b>Paid Amount</b>	45,000	9,000	54,000
<b>Date of Payment</b>	15.04.2025		
<b>UTR Reference</b>	PUNBN62025041559927616	-	

**For and behalf of Padam Cotton Yarns Limited**


**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM COTTON YARNS LIMITED**

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 Regd. Office: 196, 1st Floor, G.T. Road, Opp. Red Cross Market, Karnal- 132001

CIN: L17112HR1994PLC033641

आयकर विभाग  
INCOME TAX DEPARTMENT

भारत सरकार  
GOVT. OF INDIA

स्थायी लेखा संख्या कार्ड  
Permanent Account Number Card  
AAPPG4043G

नाम/ Name  
PADAM SAIN GUPTA

पिता का नाम/ Father's Name  
JATI RAM

जन्म की तारीख/  
Date of Birth  
30/09/1941

हस्ताक्षर/ Signature

20032020

Padam Sain



आयकर विभाग  
INCOME TAX DEPARTMENT

भारत सरकार  
GOVT. OF INDIA

स्थायी लेखा संख्या कार्ड  
Permanent Account Number Card  
AADPL3023F

नाम / Name  
PREM LATA

पिता का नाम / Father's Name  
RAM SAROOP GUPTA

जन्म की तारीख /  
Date of Birth  
26/01/1946

हस्ताक्षर / Signature

20032020

प्रेमलता

आयकर विभाग  
INCOME TAX DEPARTMENT

भारत सरकार  
GOVT. OF INDIA

स्थायी लेखा संख्या कार्ड  
Permanent Account Number Card  
AAPPG4042H

नाम/ Name  
RADHIKA GUPTA

पिता का नाम/ Father's Name  
NARENDER GUPTA

जन्म की तारीख/  
Date of Birth  
15/08/1971

हस्ताक्षर/ Signature  
Radhika Gupta

20032020

Radhika Gupta

आयकर विभाग  
INCOME TAX DEPARTMENT

भारत सरकार  
GOVT. OF INDIA

स्थायी लेखा संख्या कार्ड  
Permanent Account Number Card

AAPPG4029A

नाम / Name  
VIVEK GUPTA

पिता का नाम / Father's Name  
PADAM SAIN GUPTA

जन्म की तारीख /  
Date of Birth  
26/06/1969

हस्ताक्षर / Signature

16052020

*Vivek Gupta*

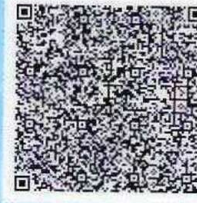
आयकर विभाग  
INCOME TAX DEPARTMENT



भारत सरकार  
GOVT. OF INDIA

स्थायी लेखा संख्या कार्ड  
Permanent Account Number Card

AACHV1673G



नाम / Name  
VIVEK GUPTA (HUF)

निगमन/गठन की तारीख  
Date of Incorporation/Formation  
01/04/1998

20052020

VIVEK GUPTA (HUF)

*Vivek Gupta*  
KARTA

आयकर विभाग  
INCOME TAX DEPARTMENT

भारत सरकार  
GOVT. OF INDIA

RAJEV GUPTA

PADAM SAIN GUPTA

15/02/1963  
Permanent Account Number  
AAPPG4046D

*Rajiv Gupta*  
Signature

27072010

*Rajiv Gupta*



RAJEV GUPTA (HUF)  
*Rajeev Gupta*  
KARTA

आयकर विभाग  
INCOME TAX DEPARTMENT  
REKHA GUPTA  
RAI BINDER SINGLA  
14/02/1966  
Permanent Account Number  
AAPPG4033J  
Signature  
26072010



Rekha Gupta





**Date: 15.04.2025**

To,  
**BSE Limited,**  
Listing Compliance Monitoring Cell,  
24<sup>th</sup> Floor, P.J. Towers,  
Dalal Street, Mumbai- 400001

**Ref: Company Code No. 531395 PADAMCO**

**Sub: Undertaking**

Dear Sir/Ma'am,

We, hereby undertake that Company doesn't require to take shareholders' approval for promoter's reclassification to public category as the promoter(s) seeking reclassification and persons related to the promoter(s) seeking reclassification, together, do not hold more than one (1) percent of the total voting rights in the listed entity.

Thanking You.

**For and behalf of Padam Cotton Yarns Limited**



**Neeraj Chugh**  
**Company Secretary & Compliance Officer**  
**M. No.: A61326**  
**Email Id: [cspcyl6@gmail.com](mailto:cspcyl6@gmail.com)**  
**Contact number: +91- 8383858860**

**PADAM COTTON YARNS LIMITED**

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CIN: L17112HR1994PLC033641