

February 27, 2021

To,

BSE Limited

Security Code – 517385

National Stock Exchange of India Limited

Symbol – SYMPHONY

**Sub.: Reply to clarification sought by Exchange for spurt in volume in shares of the Company in recent past**

**Ref.: NSE letter bearing ref. No. NSE/CM/Surveillance/10446 dated 26.02.2021**

Dear Sir/ Madam,

1. The Company is in receipt of your aforesaid letter on February 26, 2021 seeking clarification on increase in volume of Company's securities across Exchanges in the recent past through email and acknowledge its receipt thereof.
2. The Company wish to place on record following recent disclosures submitted to Stock Exchanges since February 1, 2021. The same are also available on the website of the stock exchanges and Company.

<b>Sr. No.</b>	<b>Date of Submission to the Stock Exchanges</b>	<b>Particulars of Disclosure</b>
1	25.02.2021	One-on-one meeting with Institutional Investor(s)
2	23.02.2021	One-on-one meeting with Institutional Investor(s)
3	18.02.2021	One-on-one meeting with Institutional Investor(s)
4	18.02.2021	One-on-one meeting with Institutional Investor(s)
5	09.02.2021	One-on-one meeting with Institutional Investor(s)
6	08.02.2021	Participating in Virtual Investor Conference

Email: [companysecretary@symphonylimited.com](mailto:companysecretary@symphonylimited.com)

3. In this connection, the Company would like to inform that there are no disclosures on any events other than as stated herein above or any information including development of any price sensitive information which are pending to be made from company's end.
4. The Company is in the business of Air Coolers and having substantial market share.
5. The season for the product of the Company is in offing being "Summer".
6. The Company is attaching herewith latest shareholding pattern for the quarter ended December 31, 2020 submitted to the stock exchanges at relevant point of time, for your ready reference.
7. Hope the above clarifies the purpose and object of your referred letter, however, if you need further clarification and information, please intimate the Company at the earliest.

Yours truly,

**For Symphony Limited**

**Mayur Barvadiya**

**Company Secretary**

Email: [companysecretary@symphonylimited.com](mailto:companysecretary@symphonylimited.com)

**Shareholding Pattern : Quarter ending : December 2020**

<b>Quarter ending: December 2020</b>	
Particular	Yes/No
Whether the Listed Entity has issued any partly paid-up shares?	No
Whether the Listed Entity has issued any Convertible Securities?	No
Whether the Listed Entity has issued any Warrants?	No
Whether the Listed Entity has any shares against which depository receipts are issued?	No
Whether the Listed Entity has any shares in locked-in?	No
Whether any shares held by promoters are pledge or otherwise encumbered?	No
Whether company has equity shares with differential voting rights?	No
Whether the listed entity has any significant beneficial owner?	Yes

**Summary statement holding of specified securities**

Category of shareholder	No. of shareholders	No. of fully paid-up equity shares held	Total no. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C2)	No. of Voting Rights	Total as a % of Total Voting right	No. of equity shares held in dematerialized form
(A) Promoter & Promoter Group	10	5,12,43,740	5,12,43,740	73.25	5,12,43,740	73.25	5,12,43,740
(B) Public	37,343	1,87,13,260	1,87,13,260	26.75	1,87,13,260	26.75	1,81,16,810
(C1) Shares underlying DRs				0.00		0.00	
(C2) Shares held by Employee Trust				0.00		0.00	
(C) Non Promoter-Non Public				0.00		0.00	
Grand Total	37,353	6,99,57,000	6,99,57,000	100.00	6,99,57,000	100.00	6,93,60,550

**Statement showing shareholding pattern of the Promoter and Promoter Group**

Category of shareholder	Nos. of shareholders	No. of fully paid-up equity shares held	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) As a % of (A+B+C2)	Number of equity shares held in dematerialized form
<b>A1) Indian</b>				0.00	
<b>Individuals/Hindu undivided Family</b>	4	3,87,55,540	3,87,55,540	55.40	3,87,55,540
ACHAL ANIL BAKERI	1	2,92,61,600	2,92,61,600	41.83	2,92,61,600
RUPA ACHAL BAKERI	1	70,92,940	70,92,940	10.14	70,92,940
ACHAL ANIL BAKERI - HUF (ACHAL ANIL BAKERI KARTA)	1	24,00,000	24,00,000	3.43	24,00,000
JONAKI ACHAL BAKERI JT. ACHAL ANIL BAKERI	1	1,000	1,000	0.00	1,000
<b>Any Other (specify)</b>	5	1,24,87,200	1,24,87,200	17.85	1,24,87,200
ACHAL BAKERI FAMILY TRUST (TRUSTEE - ACHAL BAKERI JT. RUPA BAKERI)	1	1,000	1,000	0.00	1,000
JONAKI BAKERI FAMILY TRUST (TRUSTEE ACHAL BAKERI JT. RUPA BAKERI JT. JONAKI BAKERI)	1	1,000	1,000	0.00	1,000
HIRVA BAKERI FAMILY TRUST (TRUSTEE - ACHAL BAKERI JT. RUPA BAKERI JT. HIRVA BAKERI)	1	1,000	1,000	0.00	1,000
RUPA BAKERI FAMILY TRUST (TRUSTEE - ACHAL BAKERI JT. RUPA BAKERI)	1	1,000	1,000	0.00	1,000
SANSKRUT TRADECOM PRIVATE LIMITED	1	1,24,83,200	1,24,83,200	17.84	1,24,83,200
<b>Sub Total A1</b>	9	5,12,42,740	5,12,42,740	73.25	5,12,42,740
<b>A2) Foreign</b>				0.00	
<b>Individuals (NonResident Individuals/ Foreign Individuals)</b>	1	1,000	1,000	0.00	1,000
HIRVA ACHAL BAKERI	1	1,000	1,000	0.00	1,000
<b>Sub Total A2</b>	1	1,000	1,000	0.00	1,000
<b>A=A1+A2</b>	10	5,12,43,740	5,12,43,740	73.25	5,12,43,740

**Statement showing shareholding pattern of the Public shareholder**

Category & Name of the Shareholders	No. of shareholder	No. of fully paid-up equity shares held	Total no. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	No. of Voting Rights	Total as a % of Total Voting right	No. of equity shares held in dematerialized form(Not Applicable)
<b>B1) Institutions</b>	0	0		0.00		0.00	
<b>Mutual Funds/</b>	13	7378331	73,78,331	10.55	73,78,331	10.55	73,78,331
DSP MIDCAP FUND	1	819330	8,19,330	1.17	8,19,330	1.17	8,19,330
HDFC TRUSTEE COMPANY LTD - A/C HDFC MID - CAPOPPORTUNITIES FUND	1	1714159	17,14,159	2.45	17,14,159	2.45	17,14,159
UTI-UNIT LINKED INSURANCE PLAN	1	813034	8,13,034	1.16	8,13,034	1.16	8,13,034
AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS LONG TERM EQUITY FUND	1	3553733	35,53,733	5.08	35,53,733	5.08	35,53,733
<b>Alternate Investment Funds</b>	1	54699	54,699	0.08	54,699	0.08	54,699
<b>Foreign Portfolio Investors</b>	72	2482592	24,82,592	3.55	24,82,592	3.55	24,82,592
<b>Financial Institutions/ Banks</b>	1	10	10	0.00	10	0.00	10
<b>Any Other (specify)</b>	3	247674	2,47,674	0.35	2,47,674	0.35	2,47,674
Qualified Institutional Buyer	3	247674	2,47,674	0.35	2,47,674	0.35	2,47,674
<b>Sub Total B1</b>	90	10163306	1,01,63,306	14.53	1,01,63,306	14.53	1,01,63,306
<b>B2) Central Government/ State Government(s)/ President of India</b>	0	0		0.00		0.00	
<b>B3) Non-Institutions</b>	0	0		0.00		0.00	
<b>Individual share capital upto Rs. 2 Lacs</b>	34929	4142431	41,42,431	5.92	41,42,431	5.92	36,44,981
<b>Individual share capital in excess of Rs. 2 Lacs</b>	1	1204000	12,04,000	1.72	12,04,000	1.72	12,04,000
PAVAN BAKERI JT. ANIL BAKERI	1	1204000	12,04,000	1.72	12,04,000	1.72	12,04,000
<b>NBFCs registered with RBI</b>	1	285	285	0.00	285	0.00	285
<b>Any Other (specify)</b>	2322	3203238	32,03,238	4.58	32,03,238	4.58	31,04,238
Trusts	2	4185	4,185	0.01	4,185	0.01	4,185
Non-Resident Indian (NRI)	1217	301184	3,01,184	0.43	3,01,184	0.43	2,03,184
Clearing Members	131	68513	68,513	0.10	68,513	0.10	68,513
Bodies Corporate	322	1529529	15,29,529	2.19	15,29,529	2.19	15,28,529

ROWENTA NETWORKS PRIVATE LIMITED	1	838847	8,38,847	1.20	8,38,847	1.20	8,38,847
IEPF	1	399500	3,99,500	0.57	3,99,500	0.57	3,99,500
Unclaimed or Suspense or Escrow Account	1	81000	81,000	0.12	81,000	0.12	81,000
HUF	644	98086	98,086	0.14	98,086	0.14	98,086
Director or Director's Relatives	4	721241	7,21,241	1.03	7,21,241	1.03	7,21,241
<b>Sub Total B3</b>	37253	8549954	85,49,954	12.22	85,49,954	12.22	79,53,504
<b>B=B1+B2+B3</b>	37343	18713260	1,87,13,260	26.75	1,87,13,260	26.75	1,81,16,810

Details of the shareholders acting as persons in Concert including their Shareholding (No. and %):

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

**Note**  
(1) PAN would not be displayed on website of Stock Exchange(s).  
(2) The above format needs to disclose name of all holders holding more than 1% of total number of shares  
(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available.

Note: (A) Executive Director: Total 11,74,052 equity shares (1.68%) held by himself, spouse, two bodies corporate in which Mr. Nrupesh Shah, Executive Director, is substantially interested as a partner, His HUF and family trust in which he and his family members are beneficiaries. Mr. Nrupesh Shah is not a promoter director and hence holding is classified under 'Any Others' - Other, the breakup is as under: i. 4,52,811 equity shares held by two bodies corporate in which Mr. Nrupesh Shah is substantially interested have been classified under "Bodies Corporate" category. ii. 4,25,480 equity shares in aggregate held by himself, spouse and his HUF is classified under 'Any Others (Director and Director's Relatives)". iii. 2,95,761 equity shares held by Family Trust in which he and his family members are beneficiaries is classified under "Any others (Director and Director's Relatives)".

#### Statement showing details of significant beneficial owners

Sr.No	Details of the SBO (I)		Details of the registered owner (II)		Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect*: (III)					Date of creation / acquisition of significant beneficial interest# (IV)
					Whether by virtue of:					
	Name	Nationality	Name	Nationality	Shares	Voting rights	Rights on distributable dividend or any other distribution	Exercise of control	Exercise of significant influence	
1	ACHAL ANIL BAKERI	India	ACHAL ANIL BAKERI HUF (ACHAL ANIL BAKERI - KARTA)	India	45	45	45	Yes	Yes	27/09/1991
2	RUPA ACHAL BAKERI	India	SANSKRUT TRADECOM PRIVATE LIMITED	India	28	28	28	Yes	Yes	11/01/2018

Note = \* In case the nature of the holding/ exercise of the right of a SBO falls under multiple categories specified under (a) to (e) under Column III, multiple rows for the same SBO shall be inserted accordingly for each of the categories.  
# This column shall have the details as specified by the listed entity under Form No. BEN-2 as submitted to the Registrar.