

Khoday India Limited

DISTILLERS, BREWERS & MALTSTERS

Regd. Office : "BREWERY HOUSE" 7th Mile, Kanakapura Road
BANGALORE-560 062

18.07.2018

CIN : L85110KA1965PLC001590

BSE Ltd
Floor 25,
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400 001

Sir,

Kind Attn: Manager – DCS / Listing.

In continuation of our letter dated 08-06-2018, we note with deep concern that daily transfer of legally cancelled equity shares of Khoday India Limited in dematerialized mode is being allowed on Bombay Stock Exchange (BSE Ltd) despite the following facts:

- 1) Order dated 07-08-2014 in COP 132/2014 passed by the Hon'ble High Court of Karnataka, which is in force as Order-in-rem.
- 2) Certificate dated 12-09-2014 issued by the Registrar of Companies, Karnataka, Bangalore registering the said Court Order, thus effectively cancelling the entire shareholding of 39,31,042 equity shares hitherto held by the erstwhile public shareholders.
- 3) Order dated 21-09-2015 of the Hon'ble High Court of Karnataka, Bangalore dismissing the multiple applications (including the impleading application) filed by SEBI in COP 132/2014.
- 4) Record date fixed by the Company and intimated to BSE Limited on 6 different occasions i.e on 29-09-2014, 10-10-2014, 07-12-2014, 07-04-2015, 22-06-2015 and 13-10-2015, which however were not accepted by the BSE Ltd reportedly at the instance of SEBI.
- 5) The Audited Financial Statements filed by the Company with Registrar of Companies and the Audited Financial Results filed with BSE Limited for the

For Khoday India Limited

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(K.L. Swamy)
Executive Director

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financial years 2014-15, 2015-16, 2016-17 and 2017-18, which were prepared based on the Certificate dated 12-09-2014, issued by the Registrar of Companies, Karnataka, Bangalore, clearly disclosing therein that the entire paid up share capital of Rs.33,66,01,950/- divided into 3,36,60,195 equity shares of Rs.10/- each fully paid up is held by the persons belonging to the Promoters and Promoter Group of the Company.

- 6) The quarterly statements of Shareholding Pattern of the Company submitted to BSE Limited from the 1st quarter of financial year 2014-15 up to the 4th quarter of financial year 2017-18, disclosing the fact of 100 % shareholding by the Promoters and the persons belonging to the Promoter Group of the Company.

We submit that permitting / acquiescing in the daily trading in the dematerialized mode of shares of Khoday India Limited tantamounts to disobedience of the Order of the Hon'ble High Court of Karnataka, and disregard of the Certificate issued by the Registrar of Companies based on the said Court Order ,for which BSE Limited will be solely responsible for the consequences arising therefrom.

In the circumstances, we request you once again to immediately cease the transfer of the Company's dematerialized shares on BSE Limited by causing the freeze of Company's ISIN INE687B01014 on both the Depositories viz., National Securities Depository Limited (NSDL) and Central Depository Services Limited (CDSL), to enable the determination of the persons entitled to payment in respect of their erstwhile public shareholding of Khoday India Limited, on any date suitable date that may be informed to us by BSE Limited and thus facilitate such payment in terms of the Order dated 07-08-2014 passed by the Hon'ble High Court of Karnataka.

Thanking You.

Yours faithfully,

For Khoday India Limited


(K.L. Swamy)
Executive Director