

March 14, 2022

To,

National Stock Exchange of India Limited

BSE Limited

Symbol – SYMPHONY

Security Code – 517385

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

**Ref.: 1. NSE letter bearing Ref. No. NSE/CM/Surveillance/11683 dated 11.03.2022**  
**2. BSE email bearing Ref. No.L/SURV/ONL/PV/NK/2021-2022/525 dated 14.03.2022**

Dear Sir/ Madam,

1. The Company is in receipt of aforesaid letters from NSE on March 11, 2022 and BSE on 14.03.2022 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, 2022. The same are also available on the website of the stock exchanges and Company.

Sr. No.	Date of Submission to the Stock Exchanges	Particulars of Disclosure
1	01.02.2022	One-on-one meeting with Institutional Investor(s)
2	01.02.2022	One-on-one meeting with Institutional Investor(s)
3	02.02.2022	One-on-one meeting with Institutional Investor(s)
4	18.02.2022	Interaction with Electronic Media
5	01.03.2022	One-on-one meeting with Institutional Investor(s)

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



6	01.03.2022	One-on-one meeting with Institutional Investor(s)
7	07.03.2022	Interaction with Electronic Media
8	08.03.2022	Interaction with Electronic Media
9	10.03.2022	One-on-one meeting with Institutional Investor(s)

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, 2021 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**



Encl.: as above.

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

Company Secretary

**Shareholding Pattern – Symphony Limited**  
**Quarter ending: December 2021**

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

**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	58,342	1,87,13,260	1,87,13,260	26.75	1,87,13,260	26.75	1,81,66,310
(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	
<b>Grand Total</b>	<b>58,352</b>	<b>6,99,57,000</b>	<b>6,99,57,000</b>	<b>100.00</b>	<b>6,99,57,000</b>	<b>100.00</b>	<b>6,94,10,050</b>

**Shareholding Pattern – Symphony Limited**  
**Quarter ending: December 2021**

**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
JONAKI ACHAL BAKERI JT. ACHAL ANIL BAKERI	1	1,000	1,000	0.00	1,000
ACHAL ANIL BAKERI - HUF (ACHAL ANIL BAKERI KARTA)	1	24,00,000	24,00,000	3.43	24,00,000
<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>	<b>9</b>	<b>5,12,42,740</b>	<b>5,12,42,740</b>	<b>73.25</b>	<b>5,12,42,740</b>
<b>A2) Foreign</b>				0.00	
<b>Individuals (Non Resident 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>	<b>1</b>	<b>1,000</b>	<b>1,000</b>	<b>0.00</b>	<b>1,000</b>
<b>A=A1+A2</b>	<b>10</b>	<b>5,12,43,740</b>	<b>5,12,43,740</b>	<b>73.25</b>	<b>5,12,43,740</b>



**Shareholding Pattern – Symphony Limited**  
**Quarter ending: December 2021**

**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>	8	66,71,068	66,71,068	9.54	66,71,068	9.54	66,71,068
AXIS MUTUAL FUND TRUSTEE LIMITED	1	38,93,120	38,93,120	5.57	38,93,120	5.57	38,93,120
HDFC TRUSTEE COMPANY LTD	1	19,73,433	19,73,433	2.82	19,73,433	2.82	19,73,433
<b>Alternate Investment Funds</b>	2	1,80,174	1,80,174	0.26	1,80,174	0.26	1,80,174
<b>Foreign Portfolio Investors</b>	67	30,14,636	30,14,636	4.31	30,14,636	4.31	30,14,636
TAIYO GREATER INDIA FUND LTD	1	8,03,554	8,03,554	1.15	8,03,554	1.15	8,03,554
<b>Insurance Companies</b>	3	1,60,708	1,60,708	0.23	1,60,708	0.23	1,60,708
<b>Sub Total B1</b>	<b>80</b>	<b>1,00,26,586</b>	<b>1,00,26,586</b>	<b>14.33</b>	<b>1,00,26,586</b>	<b>14.33</b>	<b>1,00,26,586</b>
<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>	55857	44,12,108	44,12,108	6.31	44,12,108	6.31	39,61,658
<b>Individual share capital in excess of Rs. 2 Lacs</b>	1	12,04,000	12,04,000	1.72	12,04,000	1.72	12,04,000
PAVAN BAKERI	1	12,04,000	12,04,000	1.72	12,04,000	1.72	12,04,000
<b>Any Other (specify)</b>	2404	30,70,566	30,70,566	4.39	30,70,566	4.39	29,74,066
Bodies Corporate	237	10,11,563	10,11,563	1.45	10,11,563	1.45	10,10,563
ROWENTA NETWORKS PRIVATE LIMITED	1	8,38,847	8,38,847	1.20	8,38,847	1.20	8,38,847
Clearing Members	46	21,271	21,271	0.03	21,271	0.03	21,271
Director or Director's Relatives	7	11,74,552	11,74,552	1.68	11,74,552	1.68	11,74,552
HUF	794	1,22,285	1,22,285	0.17	1,22,285	0.17	1,22,285

**Shareholding Pattern – Symphony Limited**  
**Quarter ending: December 2021**

IEPF	1	4,05,002	4,05,002	0.58	4,05,002	0.58	4,05,002
Non-Resident Indian (NRI)	1317	2,72,342	2,72,342	0.39	2,72,342	0.39	1,76,842
Trusts	1	51	51	0.00	51	0.00	51
Unclaimed or Suspense or Escrow Account	1	63,500	63,500	0.09	63,500	0.09	63,500
<b>Sub Total B3</b>	<b>58,262</b>	<b>86,86,674</b>	<b>86,86,674</b>	<b>12.42</b>	<b>86,86,674</b>	<b>12.42</b>	<b>81,39,724</b>
<b>B=B1+B2+B3</b>	<b>58,342</b>	<b>1,87,13,260</b>	<b>1,87,13,260</b>	<b>26.75</b>	<b>1,87,13,260</b>	<b>26.75</b>	<b>1,81,66,310</b>

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: Director and Directors relatives total holding is 11,74,552 (1.68%) equity shares. (A) Mr. Nrupesh Shah, Executive Director is holding total 11,74,052 equity shares (1.68%). The breakup is as under: i.4,85,480 equity shares in aggregate held by himself, spouse and his HUF. ii. 1,75,761 equity shares held by Family Trust in which he and his family members are beneficiaries. iii. 5,12,811 equity shares held by two bodies corporate in which Mr. Nrupesh Shah is substantially interested as partner. (B) Mr. Santosh Kumar Nema, Independent Director is holding 500 shares. Both the directors are not a promoter director and hence their holdings are classified under 'Director and Directors Relatives.

**Statement showing shareholding pattern of the Non Promoter- Non Public shareholder**

Category & Name of the Shareholders(I)	No. of shareholder(III)	No. of fully paid up equity shares held(IV)	Total no. shares held(VII = IV+V+VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)(VIII)	Number of equity shares held in dematerialized form(XIV)(Not Applicable)
<b>C1) Custodian/DR Holder</b>	0	0		0.00	
<b>C2) Employee Benefit Trust</b>	0	0		0.00	

**Shareholding Pattern – Symphony Limited**  
**Quarter ending: December 2021**

**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.