

SARASWATI COMMERCIAL (INDIA) LTD.

Regd. Off.: 209 - 210, Arcadia Building, 2nd Floor, 195, Nariman Point, Mumbai - 400 021.
Tel: 4019 8600 • Fax: 4019 8650 • E-mail: saraswati.investor@gcvl.in
Web: www.saraswaticommercial.com • CIN : L51909MH1983PLC166605

Date: 19.03.2020

To,
Corporate Relationship Department,
BSE Limited
P.J Towers, 1st Floor,
Dalal Street,
Mumbai - 400 001

Ref: **BSE- Scrip code: 512020**

Dear Sir/Madam,

Sub: Receipt of approvals for proposed issue of 1,05,896 equity shares of the Company on preferential basis

With reference the captioned subject, enclosed herewith please find the following approvals received for proposed issue of 1,05,896 Equity shares of Rs. 10/- each at Rs. 2833/- to Non-promoters on a preferential basis:

01. 'In-Principle' approval received from BSE Limited under Regulation 28(1) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
02. Prior approval received from National Stock Exchange of India Limited for the proposed change in Shareholding Pattern of the Saraswati Commercial (India) Limited being Dominant Promoter of the Four Dimensions Securities (India) Limited (Trading member of National Stock Exchange of India Limited) without change in control in accordance with the SEBI circular no SEBI/MIRSD/Cir. No.03/2010 dated January 21, 2010 and NSE Download Ref. No. : NSE/COMP/39726 dated December 20, 2018.

Kindly take the same on your records and oblige.

Yours faithfully

For Saraswati Commercial (India) Limited

Avani Sanghavi



Avani Sanghavi
Company Secretary & Compliance Officer

Encl: a.a.

DCS/PREF/DS/PRE/584/2019-20

March 18, 2020

The Company Secretary

SARASWATI COMMERCIAL (INDIA) LTD
209/210, Arcadia Building, 2nd Floor, 195,
Nariman Point, Mumbai, Maharashtra, 400021

Dear Sir,

Re: 'In-principle' approval under Regulation 28(1) of the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015.

We refer to your application seeking our "in-principle" approval for the issue of 1,05,896 equity shares of Rs. 10/- each to be issued at a price not less than Rs. 2,833/- to Non-Promoters on a preferential basis."

The Exchange hereby grants its 'in-principle' approval for the aforesaid issue. This 'in-principle' approval should not be construed as our approval for listing of aforesaid security and you are required to duly and separately comply with the requirements in respect thereof.

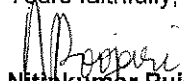
You are advised to ensure that the issue and allotment of securities is strictly in accordance with the provisions of the Companies Act, 2013, Securities Contracts (Regulation) Act, 1956, the Securities and Exchange Board of India Act, 1992, the Depositories Act, 1996 including the Rules, Regulations, Guidelines, etc. made there under, Chapter V of SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 (ICDR Regulations), the SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 (LODR Regulations) and the Listing Agreement signed with us. In addition, you shall also obtain such statutory and other approvals as are required for the purpose.

On allotment of securities pursuant to this 'in principle' approval you are required to make a listing application without delay, with applicable fees, in terms of Regulation 14 of the LODR Regulations and comply with the post issue formalities. Listing application and the checklist for post issue listing formalities can be downloaded from the link:<https://www.bseindia.com/static/about/downloads.aspx?expandable=2>.

In addition to above, the company should note that as per Schedule XIX – Para (2) of ICDR Regulations and as specified in SEBI circular no. SEBI/HO/CFD/DIL2/CIR/P/2019/94 dated August 19, 2019, "the issuer or the issuing company, as the case may be, shall, make an application for listing, **within twenty days** from the date of allotment, to one or more recognized stock exchange(s)" along with the documents specified by stock exchange(s) from time to time. Any Non-compliance with the above requirement will attract, the fine as mentioned in SEBI circular no. SEBI/HO/CFD/DIL2/CIR/P/2019/94 dated August 19, 2019.

The Exchange reserves its right to withdraw this 'in-principle' approval at any stage if the information submitted to the Exchange is found to be incomplete/ incorrect/ misleading/ false or if it contravenes any Rules, Bye-laws and Regulations of the Exchange, LODR Regulations, ICDR Regulations and Guidelines/ Regulations issued by any statutory authorities etc.

Yours faithfully,



Nitikumar Pujari
Senior Manager

Ref No: NSE/WRO-MEM/2020/2396

March 13, 2020

FOUR DIMENSIONS SECURITIES (INDIA) LTD.
209/210, 2nd Floor, Arcadia Building,
Plot No. 195, Nariman Point,
Mumbai- 400021

Kind Attention: Mr. Sandeep Kejariwal, Compliance Officer

Dear Sir

Subject: Change in Shareholding pattern

This is with reference to your application pertaining to the captioned subject. In accordance with SEBI circular no SEBI/MIRSD/Cir. No.03/2010 dated January 21, 2010, the Exchange has granted fee clearance to Four Dimensions Securities (India) Limited for the below given change in shareholding details as per Annexure-I and the Exchange has taken note of the same subject to the compliance with applicable requirements as per Companies Act.

You are requested to ensure that:

- There would be no further change in directors and / or the shareholding pattern of Four Dimensions Securities (India) Limited without prior approval from the Exchange.
- The dominant promoters, Ashwin Kothari (0.05%), Winro Commercial (India) Limited (39.52%), Meena Ashwin Kothari (0.00%), Saraswati Commercial (India) Limited (15.99%) and Rohit A Kothari (0.86%) will continue to be dominant promoters and hold at least 51.00 % of the total paid up share capital of the trading member company at all point of time.
- The dominant promoters of Winro Commercial (India) Limited and Saraswati Commercial (India) Limited (holding companies of trading member) will continue to be dominant promoters and will hold minimum required percentage of total paid up share capital of Winro Commercial (India) Limited and Saraswati Commercial (India) Limited respectively as per LODR.
- The trading member will comply with all the requirements of the Exchange as applicable to the corporate trading members.

You are further requested to note that:

- The validity for the aforesaid approval for changes in shareholding will be upto September 30, 2020.
- You are advised to confirm to the Exchange whether the approved changes have been carried out or not latest by October 07, 2020.
- Kindly upload the documents mentioned below through the Integrated Member Portal (<https://www.connect2nse.com/MemberPortal>>ENIT home page>Others>Document Repository) in support of your confirmation.
- Latest details of shareholding pattern of trading member and / or holding company of trading member duly certified by a practicing Chartered Accountant / Company Secretary after effecting changes.(Annexure C-6 & C-7)



- Undertaking from relatives/corporate supporting the dominant shareholder, if applicable duly certified by a practicing Chartered Accountant / Company Secretary (Annexure C-8)
- You should not carry out the changes after expiry of the validity period of this approval. In case you wish to carry out this change after expiry of the validity period, you are required to make fresh application to the Exchange.
- In case the above approved changes are carried out after the expiry of the validity period, it would tantamount to change in shareholders without prior approval, which would attract necessary disciplinary action by the Exchange.
- This approval given by the Exchange will automatically lapse to the extent of changes not carried out, in case any fresh proposal for changes in shareholders is received by the Exchange.

Yours faithfully,

For National Stock Exchange of India Limited



Vaishali Bandekar
Senior Manager
Membership Compliance Department
Western Regional Office
Encl: Annexure I

Annexure I
Equity Shareholding pattern of Four Dimensions Securities (India) Ltd. as on June 12, 2017
Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING	
		No. of Shares	% Holding
1	Rohit A Kothari *	102000	0.86
2	Ashwin Kothari *	6050	0.05
3	Winro Commercial (India) Limited *	4667235	39.52
4	Meena A Kothari *	50	0.00
5	Saraswati Commercial (I) Ltd *	1889193	15.99
Total DPG Shareholding		6664528	56.43

*Dominant Promoter

Non Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING	
		No. of Shares	% Holding
6	Bihariji Securities Private Limited	300000	2.54
7	Heilen Cross Diagnostics Pvt. Ltd.	300000	2.54
8	Murarka Properties Ltd	10000	0.08
9	Geecee Investments Limited	181150	1.53
10	Meeraj Multiweb Industries Ltd	87500	0.74
11	Antique Finance Private Limited	2262154	19.15
12	A. K. Kothari HUF	116400	0.99
13	A K Kothari (S) - HUF	78900	0.67
14	Ashwin Kothari Family trust	1808057	15.31
15	P.C.Kothari HUF	885	0.00
16	Others	1591	0.01
Total Non DPG Shareholding		5146637	43.57
Total Shareholding		11811165	100.00



**Equity Shareholding pattern of Saraswati Commercial (India) Limited
(Holding company of Four Dimensions Securities (India) Ltd) as on March 2, 2020**

Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING		PROPOSED SHAREHOLDING	
		No. of Shares	% Holding	No. of Shares	% Holding
1	Ashwin Kothari*	61081	6.10	61081	5.52
2	Meena A Kothari*	19347	1.93	19347	1.75
3	Rohit A Kothari*	42141	4.21	42141	3.81
4	Harisingh Shyamsukha*	11	0.00	11	0.00
5	Niyati Mehta*	22000	2.20	22000	1.99
6	A. K. Kothari HUF*	59343	5.93	59343	5.36
7	A K Kothari (S) - HUF*	59366	5.93	59366	5.36
8	P.C.Kothari HUF*	50979	5.09	50979	4.61
9	Four Dimensions Securities (India) Limited*	205787	20.56	205787	18.59
10	Winro Commercial (India) Limited*	177584	17.74	177584	16.04
11	Four Dimensions Commodities Private Limited*	31000	3.10	31000	2.80
12	Sam Jag Deep Investments Private Limited*	1450	0.14	1450	0.13
13	Singularity Holdings Limited* (Formerly known as Geecee Investments Limited)	7861	0.79	7861	0.71
Total DPG Shareholding		737950	73.73	737950	66.67

*Dominant Promoter

Non Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING		PROPOSED SHAREHOLDING	
		No. of Shares	% Holding	No. of Shares	% Holding
14	Individual	102789	10.27	161365	14.58
15	Body Corporates	159650	15.95	187799	16.97
16	Others	539	0.05	19710	1.78
Total Non DPG Shareholding		262978	26.27	368874	33.33
Total Shareholding		1000928	100.00	1106824	100.00



**Equity Shareholding pattern of Winro Commercial (India) Limited
(Holding company of Four Dimensions Securities (India) Ltd) as on March 31, 2015**

Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING	
		No. of Shares	% Holding
1	Ashwin Kothari*	28500	2.28
2	Rohit A Kothari*	14280	1.14
3	A. K. Kothari HUF*	6200	0.49
4	A K Kothari (S) - HUF*	10000	0.80
5	P.C.Kothari HUF*	250	0.02
6	Four Dimensions Securities (India) Limited*	325050	25.95
7	Geecee Investments Limited*	110150	8.79
8	Sarashwar Trading & Finance Private Limited*	36000	2.87
9	Sam Jag Deep Investments Private Limited*	1450	0.12
10	Saraswati Commercial (I) Ltd *	100150	8.00
Total DPG Shareholding		632030	50.46

*Dominant Promoter

Non Dominant Promoter Group

Sr. No.	Name of the shareholder	CURRENT SHAREHOLDING	
		No. of Shares	% Holding
1	Body Corporates	568506	45.39
2	Others	52000	4.15
Total Non DPG Shareholding		620506	49.54
Total Shareholding		1252536	100.00

