



Smiths & Founders (India) Limited

COSEC/BSE/MPS/REG-30/0803/2018-19

Friday, March 08, 2019

By Registered A/D

**Mr. Abhijit Pai**  
**DGM - Listing Compliance**  
**BSE Limited, P.J. Towers, Dalal Street,**  
**Mumbai – 400001**

Dear Sir,

**Subject: Disclosure of events or information, to conform to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements), relating to Minimum Public Shareholding requirements**

**Unit: SMITHS AND FOUNDERS (INDIA) LIMITED – Scrip Code: 513418**

Please note that in response to our appeal made to SEBI, to consider directions as per clause 12.10(b), of the order of Hon. BIFR, with regard to categorisation of promoters, to arrive at the pattern of promoters' shareholding, in the Company, SEBI have responded yesterday, advising us to file correct shareholding pattern with BSE Limited, per directions of the order of Hon. BIFR, referred above. Please note that in terms of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements), we attach a copy of SEBI's letter, addressed to us, bearing no. SEBI/HO/CFD/CMD1/OW/P/2019/5956/1, dated 07.03.2019, for your perusal and records.

Please note that accordingly, we propose to submit to BSE Limited, the revised shareholding pattern of the Company, for quarters ended, from 31.03.2014 to 30.06.2018 ( 18 quarters, in all). Please advise whether the above reports are to be filed on line, with BSE Limited or hard copies are to be sent. We request you to note that there are different formats till 2015 and the RTA needs to check / download the data and provide the SH pattern, which may take some time.

Thank you,  
Yours truly,

**Smiths & Founders (India) Limited**

**Ravi V**  
**Company Secretary**  
Encl: as above



CC To:

**Mr. Shyam Bhagirath,**  
**Associate Manager - Listing Compliance**  
**BSE Limited, P.J. Towers, Dalal Street,**  
**Mumbai - 400001**

**Mr. Sambhaji Solat**  
**Associate Manager - Listing Compliance**  
**BSE Limited, P.J. Towers, Dalal Street,**  
**Mumbai - 400001**





Deputy General Manager  
Compliance & Monitoring Division-1  
Corporation Finance Department

भारतीय प्रतिभूति  
और विनियम बोर्ड  
Securities and Exchange  
Board of India

SEBI/HO/CFD/CMD1/OW/P/2019/...595611  
March 07, 2019

Mr. Ravi V,  
Company Secretary,  
Smiths & Founders (India) Limited,  
No.505, 5<sup>th</sup> Floor, "Brigade Rubix",  
No.20, HMT Main Road,  
Bengaluru - 560 013,  
Karnataka

**Sub: In the matter of compliance with Minimum Public Shareholding norms by Smiths & Founders (India) Limited**

Sir,

1. This has reference to your letter dated August 21, 2018 and subsequent communication on the captioned matter.
2. In this regard, you are advised to file the correct shareholding pattern with stock exchanges for relevant period considering the directions as per Clause 12.10(b) of the BIFR order dated February 20, 2014.
3. The incorrect filing of the shareholding pattern with stock exchanges is viewed seriously by SEBI. You are advised to be cautious and avoid recurrence of such instances in the future.
4. You are also advised to intimate the contents of this letter to the Stock Exchanges in accordance with Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Yours faithfully,

Pradeep Ramakrishnan

CC:

MD & CEO  
Bombay Stock Exchange Ltd.  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai - 400001