

ASP/2021/44/39

7th April, 2021

Securities Exchange Board of India
Plot No C 4-A, G Block,
Sebi Bhavan,
Bandra Kurla Complex-Bandra East
Mumbai - 400051

Dear Sir,

Sub: Disclosure under Regulation 30(1) and 30(2) of SEBI (Substantial acquisition of Shares & Takeovers) Regulations, 2011 -reg

Ref: NSE Symbol: ASPINWALL

Pursuant to Regulation 30(1) and 30(2) of SEBI (Substantial acquisition of Shares & Takeovers) Regulations, 2011, the company is in receipt of Annual disclosure from promoters together with the persons acting in concert for the year ended 31st March, 2021, which is enclosed herewith for your reference.

It is requested to take note of the same.

Yours faithfully,

For ASPINWALL AND COMPANY LIMITED



Authorised Signatory

Encl:a a

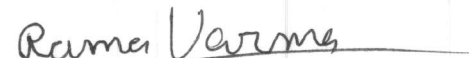
Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1. Name of the Company (TC)	Aspinwall and Company Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	National Stock Exchange of India Ltd		
3. Particulars of the shareholder(s) : a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC. Or b. Name(s) of promoter(s), member of the promoter group and PAC with him	H H Aswathi Thirunal Rama Varma		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	115514 Shares	1.48%	1.48%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	115514 Shares	1.48%	1.48%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.


Signature

Place: Trivandrum

Date: 31/03/2021

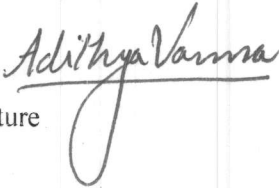
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4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	80916 Shares	1.03%	1.03%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	80916 Shares	1.03%	1.03%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.



Signature

Place: Trivandrum

Date: 31/03/2021

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4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	65890 Shares	0.84%	0.84%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	65890 Shares	0.84%	0.84%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

Gouri Lakshmi Bayi
Signature

Place: Trivandrum

Date: 31/03/2021

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a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.			
Or			
b. Name(s) of promoter(s), member of the promoter group and PAC with him	Poorurutathi Thirunal Marthanda Varma		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	211270 Shares	2.7%	2.7%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	211270 Shares	2.7%	2.7%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

Signature



Place: Trivandrum

Date: 31/03/2021

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.			
Or			
b. Name(s) of promoter(s), member of the promoter group and PAC with him	Rajaraja Varma Chemprol		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	37586 Shares	0.48%	0.48%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	37586 Shares	0.48%	0.48%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

Signature 

Place: Trivandrum

Date: 31/03/2021

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting of TC (*)
As of March 31st of the year, holding of :			
a) Shares	1044992 Shares	13.37%	13.37%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	1044992 Shares	13.37%	13.37%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

Gouri Parvathi Bayi

Signature

Place: Trivandrum

Date: 31/03/2021

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1. Name of the Company (TC)	Aspinwall and Company Limited		
2. Name(s) of the stock exchange(s) where the shares of the TC are listed	National Stock Exchange of India Ltd		
3. Particulars of the shareholder(s) : a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC. Or b. Name(s) of promoter(s), member of the promoter group and PAC with him	Kumari Investment Corporation Pvt Ltd		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	459136 Shares	5.87%	5.87%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	459136 Shares	5.87%	5.87%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

FOR KUMARI INVESTMENT CORPORATION (P) LTD.

Gowri Parvathi Bay

Signature of the Authorized Signatory Director

Place: Trivandrum

Date: 31/03/2021

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

1. Name of the Company (TC)	Aspinwall and Company Limited		
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a. Name of person(s) together with Persons Acting in Concert (PAC) whose total holding (including that in the form of shares, warrants, convertible securities and any other instrument that would entitle the holder to receive shares in the TC) is more than 25% of the voting rights of the TC.			
Or			
b. Name(s) of promoter(s), member of the promoter group and PAC with him	Narayanan Investment Trust Private Ltd		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	1705884 Shares	21.82%	21.82%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	1705884 Shares	21.82%	21.82%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.

NARAYANAN INVESTMENT TRUST PRIVATE LTD

Gowri Parwalhi Bays

Signature of the Authorized Signatory

Place: Trivandrum

Date: 31/03/2021

Disclosures under Regulation 30(1) and 30(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

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4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	1165344 Shares	14.91%	14.91%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	1165344 Shares	14.91%	14.91%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.



Signature

Place: Trivandrum

Date: 31/03/2021

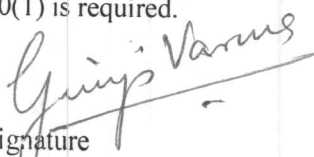
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Or			
b. Name(s) of promoter(s), member of the promoter group and PAC with him.	Girija Varma		
4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	1000 Shares	0.01%	0.01%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	1000 Shares	0.01%	0.01%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

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Place: Trivandrum

Date: 31/03/2021

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Or			
b. Name(s) of promoter(s), member of the promoter group and PAC with him.	H H Thiruvathira Thirunal Lakshmi Bayi		
4. Particulars of the shareholding of person(s) mentioned at (3) above.	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	151058 Shares	1.93%	1.93%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	151058 Shares	1.93%	1.93%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

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Signature

Place: Trivandrum

Date: 31/03/2021

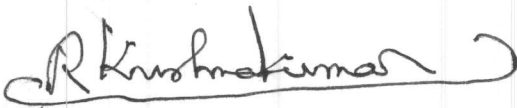
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4. Particulars of the shareholding of person(s) mentioned at (3) above	Number of Shares	% w.r.t. total share /voting capital wherever applicable	% of total diluted share/voting capital of TC (*)
As of March 31st of the year, holding of :			
a) Shares	1064 Shares	0.01%	0.01%
b) Voting Rights (otherwise than by shares)	Nil	Nil	Nil
c) Warrants,	Nil	Nil	Nil
d) Convertible Securities	Nil	Nil	Nil
e) Any other instrument that would entitle the holder to receive shares in the TC.	Nil	Nil	Nil
Total	1064 Shares	0.01%	0.01%

(*) Diluted share/voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities/warrants into equity shares of the TC.

Note

1. In case of promoter(s) making disclosure under regulation 30(2), no additional disclosure under regulation 30(1) is required.


Signature

Place: Trivandrum

Date: 31/03/2021