

GEMS COMMERCIAL COMPANY LTD.

Admin. Office:

B-38 "GHCL House", Ground Floor
Institutional Area, Sector – 1
Noida – 201 301
CIN: L51109WB1983PLC035777

website: www.gemscommercial.co.in

Email: gemscom@yahoo.com

Ph: 0120-4939945

Date: April 02, 2024

BSE Limited

Corporate Relationship Department,
1stFloor, New Trading Ring, Rotunda Building,
P.J. Towers, Dalal Street, Fort, MUMBAI-400001
Mail.ID. corp.relations@bseindia.com

National Stock Exchange Ltd

Exchange Plaza, Bandra-Kurla Complex
Bandra (East), Mumbai - 400001
mail. ID. takeover@nse.co.in

Dear Sir/Madam,

Re : GHCL Limited (BSE Code : 500171 and NSE Code : GHCL

Sub: Declaration under Regulation 31(4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011

Pursuant to Regulation 31 (4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 as amended, **Gems Commercial Company Limited**, one of the Promoter of **GHCL Limited**, hereby declare that we have not made any encumbrance of equity shares held in GHCL Limited, directly or indirectly, other than those already disclosed during the financial year ended on March 31, 2024. List of promoters, promoters group and person acting in concert is enclosed herewith for your reference and record.

For Gems Commercial Company Limited

For Gems Commercial Company Ltd.

**(Uma Jain)
Director**

Uma Jain
Director/Authorized Signatory

DIN.No.08784837

cc : Audit & Compliance Committee,
GHCL LTD,
B.38, Sector.No.-1
NOIDA,U.P.201301,

Mail ID: secretarial@ghcl.co.in

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List of Promoter, Promoter Group and Person Acting in consent

Name(s) of the person and Persons Acting in Concert (PAC) with the person.	Whether the person belongs to Promoter/Promoter Group	PAN of the person and PACs.
Anurag Dalmia (HUF)	Promoter	██████████
Anurag Dalmia	Promoter	██████████
Neelabh Dalmia	Promoter	██████████
Gems Commercial Company Limited	Promoter	██████████
Oval Investment Pvt Ltd	Promoter	██████████
Lhonak Enternational Private Limited	Promoter	██████████
Hindustan Commercial Company Limited	Promoter	██████████
Carissa Investment Pvt Ltd	Promoter	██████████
Golden Tobacco Limited	Promoter	██████████
Harvatex Engineering And Processing Company Limited	Promoter	██████████
Anurag Trading Leasing And Investment Company Pvt Ltd	Promoter	██████████
WGF Financial Services Ltd	Promoter	██████████
Dalmia Finance Ltd	Promoter	██████████
Archana Trading And Investment Company Pvt. Ltd.	Promoter	██████████
Bharatpur Investment Limited	Promoter	██████████
Sanjay Trading Investment Company Private Limited	Promoter	██████████
General Exports And Credits Limited	Promoter	██████████
Pashupatinath Commercial Pvt. Ltd.	Promoter	██████████
Sovereign Commercial Pvt.Ltd.	Promoter	██████████
Dalmia Housing Finance Ltd	Promoter	██████████
Trishul Commercial Pvt. Ltd.	Promoter	██████████
Swastik Commercial Pvt.Ltd.	Promoter	██████████
Alankar Commercial Private Limited	Promoter	██████████
Ricklunsford Trade And Industrial Investment Ltd	Promoter	██████████
Chirawa Investment Limited	Promoter	██████████
Lakshmi Vishnu Investment Limited	Promoter	██████████
Mourya Finance Limited	Promoter	██████████

For Gems Commercial Company Ltd.

Uma Jain
Director/Authorized Signatory

Sikar Investment Company Limited	Promoter	██████████
Antarctica Investment Pvt Ltd	Promoter	██████████
Comosum Investment Pvt Ltd	Promoter	██████████
Lovely Investment Pvt Ltd	Promoter	██████ ██████
Altar Investment Pvt Ltd	Promoter	██████████
Ilac Investment Private Limited	Promoter	██████████
Dear Investment Pvt Ltd	Promoter	██████████
Ram Krishna Dalmia Foundation	Promoter Group	██████████
Banjax Limited	Promoter	██████████
Hexabond Limited	Promoter	██████████

For Gems Commercial Company Limited

For Gems Commercial Company Ltd.

Uma Jain

(Uma Jain) Director/Authorized Signatory
Director
DIN.No.08784837

Place: Noida

Date: April 02, 2024