

Shrenuj & Company Ltd.

405, Dharam Palace,
100-103, N.S. Patkar Marg,
Mumbai 400 007, India.
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April 26, 2013

The Manager - Listing
BSE Ltd
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001.

Dear Sir/ Madam,

Company Code No.:- BSE - 523236/ NSE - SHRENUJ.

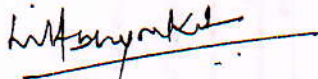
**Sub: Annual Disclosures under Regulation 13(4)
of SEBI (Prohibition of Insider Trading) Regulations, 1992.**

Enclosed please find Annual Disclosure of shares held by the Directors of the Company for the financial year ended 31st March, 2013.

Please note that the statement of annual disclosure of the shares held in the Company by the designated employee will be submitted in due course. Please take the above disclosures on your record.

Thanking you,

Yours faithfully,
For SHRENUJ & COMPANY LTD.,



SANJAY M. ABHYANKAR
COMPANY SECRETARY

Encl.: as above

c.c. The Manager
Listing Department,
National Stock Exchange of India Ltd.
"Exchange Plaza", C - 1, Block G,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400 051.

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS

[Regulation 19(c)(ii)]

Name of Director : Shreyas K. Doshi

Date of appointment : 28-12-1985

Division : Head Office

Location : Charni Road

Department : Head Office

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year/allotted on preferential basis	No. of shares demoted/ (Inter-se-transfer) during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
Name							
Self	Shreyas K. Doshi includes HUF holding	11878712 215000	1470588 Nil	Nil Nil	Nil Nil	13349300 215000 13564300	IN301127/15518224 IN301330/19416777
Spouse	Geeta Shreyas Doshi Aman Doshi Trust	2231746 500000	Nil Nil	Nil Nil	Nil Nil	2231746 500000 2731746	IN301127/15518208 IN301330/20830597
RELATIVES							
Father	Kirtilal K. Doshi includes HUF holding and Anuj Doshi Trust	3575764 281943 165000	Nil Nil Nil	Nil Nil Nil	Nil Nil Nil	3575764 281943 165000 4022707	IN301127/15518193 IN301330/20856072 IN301330/19416785
Mother	Suman K. Doshi	7552125	Nil	Nil	Nil	7552125	IN301127/15518249
Son	Vishal S. Doshi	5245421	2245588	Nil	Nil	7491009	IN301127/15959752
Son's wife	Rachana V. Doshi	Nil	Nil	Nil	Nil	Nil	-
Daughter	Aditi S. Doshi	433213	Nil	Nil	Nil	433213	IN301330/19441733
Daughter's Husband	Vishal D. Mehta	Nil	Nil	Nil	Nil	Nil	-
Brother	Anuj K. Doshi	Nil	Nil	Nil	Nil	Nil	-
Sister	Anjali P. Mehta	345017	Nil	Nil	Nil	345017	IN301127/15959777
Sister's Husband	Pradeep A. Mehta	15000	Nil	Nil	Nil	15000	IN301330/17431870

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013



SHREYAS KIRTILAL DOSHI

SERIAL NO :

PROFORMA - XII

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS .

[Regulation 19(c)(ii)]

Name of Director : Vishal S. Doshi

Date of appointment : 01-11-2007

Division : Head Office

Location : Charni Road

Department : Head Office

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year (demanded from Physical)	No. of shares demanded/ (inter-se-transfer) during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
Self	Vishal S. Doshi	5245421	2245588	NIL	NIL	7491009	IN301127/15959752
Spouse	Rachana V. Doshi	NIL	NIL	NIL	NIL	NIL	-
RELATIVES							
Father	Shreyas K. Doshi includes HUF holding	11878712 215000	1470588 NIL	NIL NIL	NIL NIL	13349300 215000	IN301127/15518224 IN301330/19416777
Mother	Geeta Shreyas Doshi Aman Doshi Trust	2231746 500000	NIL NIL	NIL NIL	NIL NIL	2231746 500000	IN301127/15518208 IN301330/20830597
Father's Father	Kirtal K. Doshi includes HUF holding and Anuj Doshi Trust	3575764 281943 165000	NIL NIL NIL	NIL NIL NIL	NIL NIL NIL	3575764 281943 165000	IN301127/15518193 IN301330/20656072 IN301330/19416785
Father's Mother	Suran K. Doshi	7552125	NIL	NIL	NIL	7552125	IN301127/15518249
Sister	Aditi S. Doshi	433213	NIL	NIL	NIL	433213	IN301330/19441733
Sister's Husband	Vishal D. Mehta	NIL	NIL	NIL	NIL	NIL	-

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013

VISHAL SHREYAS DOSHI

SERIAL NO :

PROFORMA - XII

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING
ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS
[Regulation 19(c)(iii)]

Name of Director : Dr. Badrinarayan R. Barwale

Date of appointment : 17-09-1987

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No. / DP ID/ Client ID
	Name					
Self	B. R. Barwale	18972	Nil	18972	18972	IN300020/10451491
Spouse	G. B. Barwale	Nil	Nil	Nil	Nil	-
RELATIVES		Nil	Nil	Nil	Nil	-

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013


BADRINARAYAN R. BARWALE

SERIAL NO :

PROFORMA - XII

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS

[Regulation 19(c)(ii)]

Name of Director : Dr. Surendra A. Dave

Date of appointment : 06-09-2003

Particulars of Individuals	Name	No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
Self	Dr. Surendra A. Dave	31495	Nil	Nil	31495	IN300360/10007006
Spouse	Sudha Dave	Nil	Nil	Nil	Nil	-
RELATIVES						

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013

S A Dave
DR. SURENDRA A. DAVE

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS
[Regulation 19(c)(iii)]

Name of Director : Keki M Mistry

Date of appointment : 01-09-2008

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
	Name					
Self	Keki M Mistry	25000	Nil	Nil	25000	IN300126 11173233
Spouse	Arnaaz K Mistry	Nil	Nil	Nil	Nil	-
RELATIVES						
Daughter	Tinaz K. Mistry	Nil	Nil	Nil	Nil	-

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013


 Keki M Mistry

SERIAL NO :

PROFORMA - XII

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING
ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS
[Regulation 19(c)(ii)]

Name of Director : Minoo R. Shroff

Date of appointment : 19-12-1988

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
Self	Minoo R. Shroff	64250	Nil	Nil	64250	IN301330 17192910
Spouse	Viloo Minoo Shroff	11250	Nil	Nil	11250	IN301330 17192928
RELATIVES						
Daughters	Soona Minoo Shroff	7500	Nil	Nil	7500	IN300476 10089491
	Niloufer N. Mistry	11250	11250	Nil	Nil	IN300476 10079466

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013


MINOO R. SHROFF

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS

[Regulation 19(c)(iii)]

Name of Director : S. S. Thakur

Date of appointment : 29-11-1995

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
	Name					
Self	S. S. Thakur	Nil	25000	Nil	25000	IN300126/ 10027613
Spouse	Sarla S. Thakur	Nil	Nil	Nil	Nil	-
RELATIVES						

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013


 S. S. THAKUR

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS

[Regulation 19(c)(ii)]

Name of Director : Suresh N. Talwar

Date of appointment : 30-12-1988

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
	Name					
Self	Suresh N. Talwar	75000	Nil	Nil	75000	IN300126/10882621
Spouse	Lajwanti S. Talwar	Nil	Nil	Nil	Nil	-
RELATIVES						
Son	Sujain S. Talwar	20000	Nil	Nil	20000	IN300476/42755586

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013



SURESH N. TALWAR

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS
[Regulation 19(c)(ii)]

Name of Director : Nihar N. Parikh

Date of appointment : 27-04-1999

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought (Allotted under ESOP)	No. of shares allotted pursuant to Scheme of Arrangement	No. of shares demoted/ (inter-se-transfer) during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
Self	Nihar N. Parikh	1414832	Nil	Nil	Nil	Nil	1414832	IN300829/11148573
Spouse	Tejal Nihar Parikh	Nil	Nil			Nil	Nil	
RELATIVES								
Father	Nitin Nathalal Parikh	15501	Nil	Nil	Nil	Nil	15501	IN300644 10019744
Mother	Lina Nitin Parikh	6000	Nil	Nil	Nil	Nil	6000	IN300644 10019617

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Mumbai

Date : 01-04-2013



NIHAR N. PARIKH

PROFORMA - XII

SERIAL NO :

SHRENUJ DIRECTORS AND DESIGNATED EMPLOYEES CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY DIRECTORS

[Regulation 19(c)(ii)]

Name of Director : F. G. Mogae

Date of appointment : 28-05-2012

Particulars of Individuals		No. of shares held on 01/04/2012	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31/03/2013	Folio No./ DP ID/ Client ID
	Name					
Self	F G Mogae	Nil	Nil	Nil	Nil	-
Spouse	B G Modise	Nil	Nil	Nil	Nil	-
RELATIVES						

I/We declare that I/we have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Place : Gaborone, Botswana

Date : 01-04-2013



F. G. MOGAE

