

SOVEREIGN COMMERCIAL PVT. LTD.

Reg. Office: MOHRABUILDING, M. G. MARG, GANGTOK - 737 101 (SIKKIM)

April 2, 2025

**National Stock Exchange of
India Limited**
"Exchange Plaza"
Bandra – Kurla Complex,
Bandra (E), Mumbai – 400 051
Email Id: takeover@nse.co.in

BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring, Rotunda
Building, P.J. Towers,
Dalal Street, Fort, Mumbai – 400 001
Email Id: corp.relations@bseindia.com

Dear Sir/Madam,

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

**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, **SOVEREIGN COMMERCIAL PVT. LTD.**, 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, 2025. List of promoters, promoters group and person acting in concert is enclosed herewith for your reference & record.

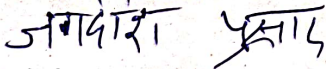
You are requested to kindly take note of the same.

Thanking you

Yours faithfully

For SOVEREIGN COMMERCIAL PVT. LTD

For Sovereign Commercial Private Limited


(Jagdish Prasad) Director
Director

Cc:

Audit & Compliance Committee
GHCL Limited
B-38, Institutional Area,
Sector-1, Noida-201301
Email Id: secretarial@ghcl.co.in

Delhi correspondence office:

Rattan Gupta & Co., Chartered Accountants, 4356/4C, Ansari Road, Darya Ganj, New Delhi - 110002

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Name of the Target Company: GHCL Limited

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	
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 Sovereign Commercial Private Limited

STANLEY KRISHNA

Director

Delhi correspondence office:

Rattan Gupta & Co., Chartered Accountants, 4356/4C, Ansari Road, Darya Ganj, New Delhi - 110002