

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

April 3, 2026

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 (Without PAN)

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, 2026.

List of promoters, promoters group and person acting in concert without PAN details is enclosed herewith for your reference & record.

You are requested to kindly take note of the same.

Thanking you

Yours faithfully

For Gems Commercial Company Limited

Authorised Signatory

Cc:

Audit & Compliance Committee

GHCL Limited

B-38, Institutional Area,
Sector-1, Noida-201301

Email Id: secretarial@ghcl.co.in


Director/Authorized Signatory

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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
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 Gems Commercial Company Limited

For Gems Commercial Company Ltd.



Director/Authorized Signatory

(Rajender Soni)
Director
DIN.No.00418933

Place: Noida

Date: April 02, 2026