

# COMOSUM INVESTMENTS PRIVATE LIMITED

Reg. Office: B-97, 2<sup>ND</sup> FLOOR, AMRITPURI, GARHI, EAST OF KAILASH, NEW DELHI-110065  
CIN: U65993DL1980PTC292755, E-MAIL: comosuminvestment123@rediffmail.com

**National Stock Exchange of India Ltd**  
Exchange Plaza, Bandra - Kurla Complex,  
**Bandra (E), MUMBAI-400051**  
Mail.ID [takeover@nse.co.in](mailto:takeover@nse.co.in)

April 04, 2026

**BSE Limited**  
Corporate Relationship Department,  
1<sup>st</sup>Floor, New Trading Ring, Rotunda Building,  
P.J. Towers, Dalal Street, Fort, MUMBAI-400001  
Mail.ID. [Corp.relations@bseindia.com](mailto: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)**

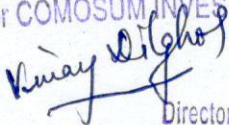
Pursuant to Regulation 31 (4) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 as amended thereof, **Comosum Investments Private Limited** one of the Promoter of **GHCL Limited**, hereby declare that we, along with persons acting in concern have not made any encumbrance 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, promoter group and person acting in concern without PAN is enclosed herewith for your reference and record.

You are requested to kindly take note of the same.

**For Comosum Investments Private Limited**

For COMOSUM INVESTMENT PVT. LTD.



Director/Authorised Signatory

(Vinay Dilghor)  
Director  
DIN.No.09434492

Cc:

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

# COMOSUM INVESTMENTS PRIVATE LIMITED

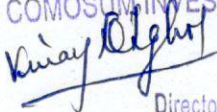
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## List of Promoter, Promoter Group and Person Acting in consent

Name(s) of the person and Persons Acting in Concert (PAC) with the person.	Whether the person belongs to Promoter/Promoter Group
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 Comosum Investments Private Limited

For COMOSUM INVESTMENT PVT. LTD.



Director/Authorised Signatory

(Vinay Dilghor)

Director

DIN.No.09434492

Place: New Delhi

Date: April 04, 2026