

**Share Holding Pattern as per Regulation 31(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015**

1. Name of Listed Entity: **Gems Commercial Co. Ltd.**  
 2. Scrip Code/Name of Scrip/Class of Security: **17131/Equity**  
 3. Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg. 31(1)(c) **Regulation 31(1)(b)**  
 a. If under 31(1)(b) then indicate the report for Quarter ending **September 30, 2018**  
 b. If under 31(1)(c) then indicate date of allotment/extinguishment **NA**  
 4. Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information -

| Particulars   | Yes* | No* |
|---|------|-----|
| 1. Whether the Listed Entity has issued any partly paid up shares?                        | -    | No  |
| 2. Whether the Listed Entity has issued any Convertible Securities or Warrants?           | -    | No  |
| 3. Whether the Listed Entity has any shares against which depository receipts are issued? | -    | No  |
| 4. Whether the Listed Entity has any shares in locked-in?                                 | -    | No  |
| 5. Whether any shares held by promoters are pledge or otherwise encumbered?               | -    | No  |

\* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No. of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format/holding of specified securities.

**5. The tabular format for disclosure of holding of specified securities is as follows :**

**Table I - Summary Statement holding of specified securities**

| Category (I) | Category of shareholder (II)   | Nos. of share holders (III) | No. of fully paid up equity shares held (IV) | No. of Partly paid up equity shares held (V) | No. of shares underlying Depository Receipts (VI) | Total nos. shares held (VII) = (IV)+(V)+(VI) | Shareholding as a % of total no. of shares (calculated as per SCRR,1957) (VIII) As a % of (A+B+C2) | Number of Voting Rights held in each class of securities (IX) |           |             | No. of Shares Underlying Outstanding convertible securities (including Warrants) (X) | Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X) as a % of (A+B+C2) | Number of Locked in shares (XII) |             | Number of Shares pledged or otherwise encumbered (XIII) |             | Number of equity shares held in dematerialized form (XIV) |                                 |
|--------------|--------------------------------|-----------------------------|--|--|---|--|--|---|-----------|-------------|--|--|----------------------------------|-------------|---|-------------|---|---------------------------------|
|              |                                |                             |  |  |   |  |  | No. of Voting Rights  |           |             |  |  | Total as a % of Total (A+B+C)    | No. (a)     | As a % of total Shares held (b)                         | No. (a)     |   | As a % of total Shares held (b) |
|              |                                |                             |  |  |   |  |  | Class (a)   | Class (b) | Total       |  |  |                                  |             |   |             |   |                                 |
| (A)          | Promoter & Promoter Group      | 6                           | 5490020                                      | 0  | 0   | 5490020                                      | 88.05  | 0   | 0         | 0.00        | 0  | 0.00   | 0                                | 0.00        | 0   | 0.00        | 0   |                                 |
| (B)          | Public                         | 1912                        | 744980                                       | 0  | 0   | 744980                                       | 11.95  | 0   | 0         | 0.00        | 0  | 0.00   | 0                                | 0.00        | 0   | 0.00        | 0   |                                 |
| (C)          | Non Promoter, Non Public       | 0                           | 0  | 0  | 0   | 0  | 0.00   | 0   | 0         | 0.00        | 0  | 0.00   | 0                                | 0.00        | 0   | 0.00        | 0   |                                 |
| (C1)         | Shares underlying DRs          | 0                           | 0  | 0  | 0   | 0  | 0.00   | 0   | 0         | 0.00        | 0  | 0.00   | 0                                | 0.00        | 0   | 0.00        | 0   |                                 |
| (C2)         | Shares held by Employee Trusts | 0                           | 0  | 0  | 0   | 0  | 0.00   | 0   | 0         | 0.00        | 0  | 0.00   | 0                                | 0.00        | 0   | 0.00        | 0   |                                 |
|              | <b>Total</b>                   | <b>1918</b>                 | <b>6235000</b>                               | <b>0</b>                                     | <b>0</b>  | <b>6235000</b>                               | <b>100</b>   | <b>0</b>  | <b>0</b>  | <b>0.00</b> | <b>0</b>   | <b>0.00</b>  | <b>0</b>                         | <b>0.00</b> | <b>0</b>  | <b>0.00</b> | <b>0</b>  |                                 |

**Table II - Statement showing shareholding pattern of the Promoter and Promoter Group**

| Category & Name of the Shareholders (I) | PAN (II)                                 | No. of share holder (III) | No. of fully paid up equity shares held (IV) | Partly paid up equity shares held (V) | Nos. of shares underlying Depository Receipts (VI) | Total nos. shares held (VII) = (IV)+(V)+(VI) | Shareholding % (calculated as per SCRR,1957) As a % of (A+B+C2) (VIII) | Number of Voting Rights held in each class of securities (IX) |         |       | No. of Shares Underlying Outstanding convertible securities (including Warrants) (X) | Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X) as a % of (A+B+C2) | Number of Locked in shares (XII)    |         | Number of Shares pledged or otherwise encumbered (XIII) |         | Number of equity shares held in dematerialized form (XIV) |                                 |
|---|--|---------------------------|--|---------------------------------------|--|--|--|---|---------|-------|--|--|-------------------------------------|---------|---|---------|---|---------------------------------|
|   |  |                           |  |                                       |  |  |  | No. of Voting Rights  |         |       |  |  | Total as a % of Total Voting rights | No. (a) | As a % of total Shares held (b)                         | No. (a) |   | As a % of total Shares held (b) |
|   |  |                           |  |                                       |  |  |  | Class X   | Class Y | Total |  |  |                                     |         |   |         |   |                                 |
| (1)                                     | Below                                    |                           |  |                                       |  |  |  |   |         |       |  |  |                                     |         |   |         |   |                                 |
| (a)                                     | Individual & Hindu undivided Family      |                           | 0  | 0                                     | 0  | 0  | 0.00   | 0   | 0       | 0     | 0.00   | 0  | 0                                   | 0       | 0   | 0.00    | 0   |                                 |
| (b)                                     | Central Government/State Government etc. |                           | 0  | 0                                     | 0  | 0  | 0.00   | 0   | 0       | 0     | 0.00   | 0  | 0                                   | 0       | 0   | 0.00    | 0   |                                 |
| (c)                                     | Financial Institutions/ Banks            |                           | 0  | 0                                     | 0  | 0  | 0.00   | 0   | 0       | 0     | 0.00   | 0  | 0                                   | 0       | 0   | 0.00    | 0   |                                 |



|     |   |            |          |                |          |          |                |              |          |          |          |             |          |             |          |          |          |             |          |
|-----|---|------------|----------|----------------|----------|----------|----------------|--------------|----------|----------|----------|-------------|----------|-------------|----------|----------|----------|-------------|----------|
| (d) | Are Other (Body Corporate)  |            | 5        | 5490020        | 0        | 0        | 5490020        | 88.05        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Management Commercial Pvt Ltd                                       | AAAC380970 |          | 757680         | 0        | 0        | 757680         | 12.15        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Pratibha Health Commercial Pvt Ltd                                  | AAAC73170  |          | 1277730        | 0        | 0        | 1277730        | 20.48        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Surya Commercial Pvt Ltd  | AAAC51870  |          | 1152230        | 0        | 0        | 1152230        | 18.48        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Realtek Commercial Pvt Ltd  | AAAC51826  |          | 873400         | 0        | 0        | 873400         | 14.01        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Talish Commercial Pvt Ltd   | AAAC73846  |          | 1303730        | 0        | 0        | 1303730        | 20.92        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Lata Book Stock & Investment Ltd                                    | AAAC14696  |          | 125250         | 0        | 0        | 125250         | 2.01         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Sub-Total (A11)   |            | 6        | 5490020        | 0        | 0        | 5490020        | 88.05        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
| (2) | Foreign   |            |          |                |          |          |                |              |          |          |          |             |          |             |          |          |          |             |          |
| (a) | Individuals (Non Resident Individuals - Foreign Individuals)        |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
| (b) | Companies   |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
| (c) | Institutions  |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
| (d) | Foreign Portfolio Investors   |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
| (e) | Are Other (specify)   |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | Sub-Total (A12)   |            | 0        | 0              | 0        | 0        | 0              | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0        | 0        | 0.00        | 0        |
|     | <b>Total Shareholding of Promoter and Promoter Group (A1)+(A12)</b> |            | <b>6</b> | <b>5490020</b> | <b>0</b> | <b>0</b> | <b>5490020</b> | <b>88.05</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0.00</b> | <b>0</b> |

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc

**Note:**

(1) PAN would not be displayed on website of Stock Exchange(s)

(2) The term "Encumbrance" has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011

**Table III - Statement showing shareholding pattern of the Public shareholder**

|     | Category & Name of the Shareholder (I) | PAN (II) | Nos. of share holder (III) | No. of full paid up equity shares held (IV) | Partly paid-up equity shares held (V) | Nos. of shares underlying Depository Receipts (VI) | Total nos. shares held VII = (IV + V + VI) | Shareholding % calculated as per SCRR,1957 As a % of (A+B+C2) (III) | Number of Voting Rights held in each class of securities (IX) |         |       | No. of Shares Underlying Outstanding convertible securities (including Warrants) (X) | Total shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (X1) | Number of Locked in shares (XII)    |        | Number of Shares pledged or otherwise encumbered (XIII) |                          | Number of equity shares held in dematerialized form (XIV) |  |
|-----|--|----------|----------------------------|---|---------------------------------------|--|--|---|---|---------|-------|--|--|-------------------------------------|--------|---|--------------------------|---|--|
|     |  |          |                            |   |                                       |  |  |   | No. of Voting Rights  |         |       |  |  | Total as a % of Total Voting rights | Nos(a) | As a % of total Shares held (b)                         | No. (Not applicable) (c) |   | As a % of total shares held (Not applicable) (d) |
|     |  |          |                            |   |                                       |  |  |   | Class X   | Class Y | Total |  |  |                                     |        |   |                          |   |  |
| (1) | Institutions                           |          |                            |   |                                       |  |  |   |   |         |       |  |  |                                     |        |   |                          |   |  |
| (a) | Mutual Funds                           |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (b) | Venture Capital Funds                  |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (c) | Alternative Investment Funds           |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (d) | Foreign Venture Capital Investors      |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (e) | Foreign Portfolio Investors            |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (f) | Financial Institutions Banks           |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (g) | Insurance Companies                    |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |
| (h) | Pension Funds/Trusts/Fund of Funds     |          | 0                          | 0   | 0                                     | 0  | 0  | 0.00  | 0   | 0       | 0     | 0.00   | 0  | 0.00                                | 0      | 0.00  | 0                        | 0.00  | 0  |



|     |   |             |               |          |          |               |              |          |          |          |             |          |             |          |             |          |             |          |
|-----|---|-------------|---------------|----------|----------|---------------|--------------|----------|----------|----------|-------------|----------|-------------|----------|-------------|----------|-------------|----------|
| (i) | Any Other (specify)   | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | Sub-Total (Bx1)   | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (2) | Central Government/ State Government/ President of India                                  | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | Sub-Total (Bx2)   | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (3) | Non-institutions  |             |               |          |          |               |              |          |          |          |             |          |             |          |             |          |             |          |
| (a) | Individuals - i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs. | 1891        | 552430        | 0        | 0        | 552430        | 8.86         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.       | 0           | 0             | 0        | 0        | 0             | 0            | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (b) | MFIs registered with SEBI   | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (c) | Employee Trusts   | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (d) | Foreign Depositories (holding DRs) (disclosure figure)                                    | 0           | 0             | 0        | 0        | 0             | 0.00         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
| (e) | Any Other specify (Bank/ Corporate)   | 21          | 192550        | 0        | 0        | 192550        | 3.09         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | Dakka Leasing & Finance Ltd   |             | 79900         | 0        | 0        | 79900         | 1.28         | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | Sub-Total (Bx3)   | 1912        | 744980        | 0        | 0        | 744980        | 11.95        | 0        | 0        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        | 0.00        | 0        |
|     | <b>Total Public Shareholding (B) = (Bx1)+(Bx2)+(Bx3)</b>                                  | <b>1912</b> | <b>744980</b> | <b>0</b> | <b>0</b> | <b>744980</b> | <b>11.95</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> | <b>0</b> | <b>0.00</b> | <b>0</b> |

Details of the shareholders acting as persons in Concert including their Shareholding (%) and %:

Details of Shares which remain unclaimed may be given along with details such as name of shareholders, outstanding shares held as dematerialized computer account, voting rights which are given etc.

Note:

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to be checked along with the name of following persons: Individuals/Non Institutions holding more than 1% of total number of shares.

(3) Where the information pertains to Depository Accounts, the same may be displayed in the respective column to the extent information available and the balance to be disclosed as held by depository.

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

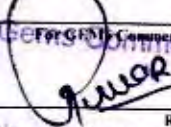
| Category & Name of the Shareholder (i) | PAN (ii)   | No. of shares held (iii) | No. of fully paid-up equity shares held (iv) | Partly paid-up equity shares held (v) | Nos. of shares underlying Depository Receipts (vi) | Total no. shares held (vii) = (v) + (vi) | Shareholding % calculated as per SCRR, 1957 as a % of (A+B+C2) (viii) | Number of Voting Rights held in each class of securities (ix) |          |          | No. of Shares Underlying Outstanding convertible securities (including Warrants) (x) | Total Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (xi) | Number of Locked in shares (xii)    |          | Number of Shares pledged or otherwise encumbered (xiii) |                      | Number of equity shares held in dematerialized form (xiv) |  |
|--|--|--------------------------|--|---------------------------------------|--|--|---|---|----------|----------|--|--|-------------------------------------|----------|---|----------------------|---|--|
|  |  |                          |  |                                       |  |  |   | No. of Voting Rights  |          |          |  |  | Total as a % of Total Voting rights | No.      | As a % of total Shares held                             | No. (Not applicable) |   | As a % of total shares held (Not applicable) |
|  |  |                          |  |                                       |  |  |   | Class A   | Class B  | Total    |  |  |                                     |          |   |                      |   |  |
| (1)                                    | Investment/DH Holder   |                          |  |                                       |  |  |   |   |          |          |  |  |                                     |          |   |                      |   |  |
| (ii)                                   | Share of DR Holder (if available)  | 0                        | 0  | 0                                     | 0  | 0  | 0.00  | 0   | 0        | 0        | 0.00   | 0  | 0.00                                | 0        | 0.00  | 0                    | 0.00  | 0  |
| (3)                                    | Employee Benefit Trust under SEBI (Share Based Employee Benefit Regulations, 2014) | 0                        | 0  | 0                                     | 0  | 0  | 0.00  | 0   | 0        | 0        | 0.00   | 0  | 0.00                                | 0        | 0.00  | 0                    | 0.00  | 0  |
|  | <b>Total Non-Promoter- Non Public Shareholding (B) = (C1)+(C2)</b>                 | <b>0</b>                 | <b>0</b>                                     | <b>0</b>                              | <b>0</b>   | <b>0</b>                                 | <b>0.00</b>   | <b>0</b>  | <b>0</b> | <b>0</b> | <b>0.00</b>  | <b>0</b>   | <b>0.00</b>                         | <b>0</b> | <b>0.00</b>   | <b>0</b>             | <b>0.00</b>   | <b>0</b>                                     |

Note:

(1) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to disclose name of all holders holding more than 1% of total number of shares.

|                    |  |
|--------------------|--|
| Name & Designation |  |
| Date: 10/10/2018   |  |

For Gergal Commercial Co. Ltd.  
  
 Rajat Kumar  
 Director/Managing Director/Authorized Signatory