

Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015		
1	Name of Listed Entity: KRBL Limited	
2	Scrip Code/Name of Scrip/Class of Security: 530813 (BSE)/KRBL (NSE)/Equity	
3	Share Holding Pattern Filed Under: Reg. 31(1)(b)	
	a.	If under 31(1)(b) then indicate the report for Quarter ending: 31 MARCH 2022
	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	
	I	Whether the Listed Entity has issued any partly paid up shares? No
	II	Whether the Listed Entity has issued any Convertible Securities? No
	III	Whether the Listed Entity has issued any Warrants? No
	IV	Whether the Listed Entity has any shares against which depository receipts are issued? No
	V	Whether the Listed Entity has any shares in locked-in? No
	VI	Whether any shares held by promoters are pledge or otherwise encumbered? No
	VII	Whether the Listed Entity has equity shares with differential voting rights? No
	VIII	Whether the Listed Entity has any Significant Beneficial Owner? Yes
	*	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, equity shares with differential voting rights, significant beneficial owner, 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 'Zero' by default on submission of the format of holding of specified securities.



KRBL Limited
Table 1: Summary Statement holding of Specified Securities

Category	Category of Shareholder	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total Nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including warrants)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked in shares		Number of shares pledged or otherwise encumbered		Number of equity shares held in dematerialized form
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)= (IV)+(V)+(VI)	(VIII) As a % of (A+B+C2)	(IX)			(X)	(XI)=(VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(XIV)
								No. of Voting Rights		Total as a % of (A+B+C)			No.	As a % of total shares held	No.	As a % of total shares held	
								Class: Equity Shares of Re.1/- each	Class eg: Y	Total							
(A)	Promoter & Promoter Group	20	140754296	0	0	140754296	59.80	140754296	0	140754296	59.80	0	59.80	0	0		140754296
(B)	Public	71389	94635596	0	0	94635596	40.20	94635596	0	94635596	40.20	0	40.20	0	0	N/A	94508244
(C)	Non Promoter- Non Public	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	0
(C1)	Shares underlying DRs	0	0	0	0	0	N/A	0	0	0	0	0	0	0	0	N/A	0
(C2)	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0	0	0	N/A	0
	Total	71409	235389892	0	0	235389892	100.00	235389892	0	235389892	100.00	0	100.00	0	0		235262540



Table II: Statement showing Shareholding Pattern of the Promoter and Promoter Group

	Category & Name of the Shareholders	PAN	No. of Shareholder	No. of Fully paid-up Equity Shares held	Partly paid-up Equity Shares held	Nos. of Shares underlying Depository Receipts	Total No. Shares held	Shareholding % calculate as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities				No. of Shares underlying outstanding convertible securities (including warrants)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	No. of Locked-in shares	No. of shares pledge or otherwise encumbered	No. of Equity Shares held in dematerialized form	
	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)= (IV)+(V)+ (VI)	(VIII)	(IX)				(X)	(XI)=(VII)+(X) As a % of (A+B+C2)	(XII)	(XIII)	(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: Equity Shares of Re.1/- each	Class Y	Total							
(1)	Indian																	
(a)	Individuals/ Hindu Undivided Family		16	15751084	0	0	15751084	6.69	15751084	0	15751084	6.69	0	6.69	0	0	0	15751084
	ANOO KUMAR GUPTA	AAHPG6768N		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	ARUN KUMAR GUPTA	AAHPG0447O		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	NEHA GUPTA	AFEPG8964L		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	RASHI GUPTA	AMMPG3102H		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	AYUSH GUPTA	ANFPG4151N		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	AKSHAY GUPTA	ANFPG1208C		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	KUNAL GUPTA	A1JPG9381O		184	0	0	184	0.00	184	0	184	0.00	0	0.00	0	0	0	184
	PRIYANKA MITTAL	AALPM1934C		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	ANIL KUMAR MITTAL, KARTA OF ANIL KUMAR MITTAL HUF	AAHA6040E		3599900	0	0	3599900	1.53	3599900	0	3599900	1.53	0	1.53	0	0	0	3599900
	ASHISH MITTAL	AEMPM5831P		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	ARUN KUMAR GUPTA, KARTA OF ARUN KUMAR GUPTA HUF	AAHA6042G		4849900	0	0	4849900	2.06	4849900	0	4849900	2.06	0	2.06	0	0	0	4849900
	PREETI MITTAL	AAIPM7844G		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	ANOO KUMAR GUPTA, KARTA OF ANOO KUMAR GUPTA HUF	AAHA6041F		7299900	0	0	7299900	3.10	7299900	0	7299900	3.10	0	3.10	0	0	0	7299900
	ANIL KUMAR MITTAL	AALPM8403A		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	BINITA GUPTA	AAFPG4816P		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
	ANULIKA GUPTA	AAGPG4621B		100	0	0	100	0.00	100	0	100	0.00	0	0.00	0	0	0	100
(b)	Central Government/ State Government(s)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(c)	Financial Institutions/ Banks		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(d)	Any other (Specify)																	
	Trust		4	125003212	0	0	125003212	53.10	125003212	0	125003212	53.10	0	53.10	0	0	0	125003212
	ANOO KUMAR GUPTA FAMILY TRUST	AAFTA5145F		38849338	0	0	38849338	16.50	38849338	0	38849338	16.50	0	16.50	0	0	0	38849338
	ANIL MITTAL FAMILY TRUST	AAFTA5146G		43317296	0	0	43317296	18.40	43317296	0	43317296	18.40	0	18.40	0	0	0	43317296
	ARUN KUMAR GUPTA FAMILY TRUST	AAFTA6022K		42065146	0	0	42065146	17.87	42065146	0	42065146	17.87	0	17.87	0	0	0	42065146
	BINITA GUPTA FAMILY TRUST	AACTB8887C		771432	0	0	771432	0.33	771432	0	771432	0.33	0	0.33	0	0	0	771432
	PREETI MITTAL FAMILY TRUST	AAETP3196N		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	ANULIKA GUPTA FAMILY TRUST	AAFTA6023J		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	PRIYANKA MITTAL FAMILY TRUST	AADTP7660A		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	ASHISH MITTAL FAMILY TRUST	AAGTA5460L		0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	Sub-Total (A)(1)		20	140754296	0	0	140754296	59.80	140754296	0	140754296	59.80	0	59.80	0	0	0	140754296
(2)	Foreign																	
(a)	Individuals (Non-Residents Individuals/ Foreign Individuals)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(b)	Government		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(c)	Institutions		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(d)	Foreign Portfolio Investor		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
(e)	Any other (Specify)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	Sub-Total (A)(2)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0	0	0
	Total Shareholding of Promoter and Promoter Group (A)=(A)(1)+(A)(2)		20	140754296	0	0	140754296	59.80	140754296	0	140754296	59.80	0.00	59.80	0	0	0	140754296
Note:	PREETI MITTAL FAMILY TRUST, ANULIKA GUPTA FAMILY TRUST, PRIYANKA MITTAL FAMILY TRUST AND ASHISH MITTAL FAMILY TRUST ARE NOT HOLDING ANY SHARES IN THE COMPANY BUT FORMS PART OF THE PROMOTERS GROUP, THEREFORE, THEIR NAMES HAVE BEEN INCLUDED IN THE SHAREHOLDING PATTERN.																	



Table III: Statement showing Shareholding Pattern of Public Shareholders

	Category & Name of the Shareholders	PAN	No. of Shareholder	No. of Fully paid-up Equity Shares held	Partly paid-up Equity Shares held	Nos. of Shares underlying Depository Receipts	Total No. Shares held	Shareholding % calculate as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			No. of Shares underlying outstanding convertible securities (including warrants)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted)	No. of Locked-in shares		No. of shares pledge or otherwise encumbered	No. of Equity Shares held in dematerialized form
	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)= (IV)+(V)+(VI)	(VIII)	(IX)			(X)	(XI)=(VIII)+(X) As a % of (A+B+C2)	(XII)		(XIII)	(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: Equity Shares of Re.1/- each	Class Y	Total						
(1)	Institutions																
(a)	Mutual Funds		6	345852	0	0	345852	0.15	345852	0	345852	0.15	0.15	0	0	0	345852
(b)	Venture Capital Funds		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(c)	Alternate Investment Funds		2	14600	0	0	14600	0.01	14600	0	14600	0.01	0.01	0	0	0	14600
(d)	Foreign Venture Capital Investors		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(e)	Foreign Portfolio Investor		60	6019445	0	0	6019445	2.56	6019445	0	6019445	2.56	2.56	0	0	0	6019445
(f)	Financial Institutions/ Banks		1	263	0	0	263	0.00	263	0	263	0.00	0.00	0	0	0	263
(g)	Insurance Companies		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(h)	Provident Funds/ Pension Funds		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(i)	Any other (Specify)		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
	Sub-Total (B)(1)		69	6380160	0	0	6380160	2.71	6380160	0	6380160	2.71	2.71	0	0	0	6380160
(2)	Central Government/ State Government(s)/ President of India		2	14333241	0	0	14333241	6.09	14333241	0	14333241	6.09	6.09	0	0	0	14333241
	Joint Director of Enforcement, Central Region	EXEMPTCATG		14333221	0	0	14333221	6.09	14333221	0	14333221	6.09	6.09	0	0	0	14333221
	Sub-Total (B)(2)		2	14333241	0	0	14333241	6.09	14333241	0	14333241	6.09	6.09	0	0	0	14333241
(3)	Non-Institutions																
(a)	Individuals-																
	i. Individuals Shareholders holding nominal share capital upto Rs. 2 Lakhs		68333	26247346	0	0	26247346	11.15	26247346	0	26247346	11.15	11.15	0	0	0	26124994
	ii. Individuals Shareholders holding nominal share capital in excess of Rs. 2 Lakhs		12	15973097	0	0	15973097	6.79	15973097	0	15973097	6.79	6.79	0	0	0	15973097
	Seema Goel	AHAPG8015A		2848000	0	0	2848000	1.21	2848000	0	2848000	1.21	1.21	0	0	0	2848000
	Som Nath Aggarwal	AAKPA9546M		3655182	0	0	3655182	1.55	3655182	0	3655182	1.55	1.55	0	0	0	3655182
	Anil Kumar Goel	AAJPG2552Q		6500000	0	0	6500000	2.76	6500000	0	6500000	2.76	2.76	0	0	0	6500000
(b)	NBFCs registered with RBI		4	10440	0	0	10440	0.00	10440	0	10440	0.00	0.00	0	0	0	10440
(c)	Employee Trusts		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(d)	Overseas Depositories (Holding DRs) (Balancing Figures)		0	0	0	0	0	0.00	0	0	0	0.00	0.00	0	0	0	0
(e)	Any other (Specify)		2969	31691312	0	0	31691312	13.46	31691312	0	31691312	13.46	13.46	0	0	0	31686312
	Body Corporate		419	3943297	0	0	3943297	1.68	3943297	0	3943297	1.68	1.68	0	0	0	3938297
	Limited Liability Partnership		38	397400	0	0	397400	0.17	397400	0	397400	0.17	0.17	0	0	0	397400
	Clearing Member / Clearing House		103	488149	0	0	488149	0.21	488149	0	488149	0.21	0.21	0	0	0	488149
	Foreign Nationals		2	1100000	0	0	1100000	0.47	1100000	0	1100000	0.47	0.47	0	0	0	1100000
	Foreign Body Corporate		1	22900000	0	0	22900000	9.73	22900000	0	22900000	9.73	9.73	0	0	0	22900000
	Reliance Commodities DMCC	AADCR5155R		22900000	0	0	22900000	9.73	22900000	0	22900000	9.73	9.73	0	0	0	22900000
	Hindu Undivided Family/Association of Persons		1021	1082688	0	0	1082688	0.46	1082688	0	1082688	0.46	0.46	0	0	0	1082688
	Investor Education and Protection Fund (IEPF)		1	73437	0	0	73437	0.03	73437	0	73437	0.03	0.03	0	0	0	73437
	Non Resident Indian - Non Repatriable		471	535393	0	0	535393	0.23	535393	0	535393	0.23	0.23	0	0	0	535393
	Non Resident Indian - Repatriable		911	1168048	0	0	1168048	0.50	1168048	0	1168048	0.50	0.50	0	0	0	1168048
	Foreign Portfolio Investor - Category III		2	2900	0	0	2900	0.00	2900	0	2900	0.00	0.00	0	0	0	2900
	Sub-Total (B)(3)		71318	73922195	0	0	73922195	31.40	73922195	0	73922195	31.40	31.40	0	0	0	73794843
	Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)		71389	94635596	0	0	94635596	40.20	94635596	0	94635596	40.20	40.20	0	0	0	94508244



Table IV: Statement showing Shareholding Pattern of Non Promoter-Non Public Shareholder

	Category & Name of the Shareholders	PAN	No. of Shareholder	No. of Fully paid-up Equity Shares held	Partly paid-up Equity Shares held	Nos. of Shares underlying Depository Receipts	Total No. Shares held	Shareholding % calculate as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities				No. of Shares underlying outstanding convertible securities (including warrants)	Total Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	No. of Locked-in shares		No. of shares pledge or otherwise encumbered		No. of Equity Shares held in dematerialized form
	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)= (IV)+(V)+(VI)	(VIII)	(IX)				(X)	(XI)=(VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(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)	
(1)	Custodian/DR Holder	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Sub-Total (C)(1)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
(2)	Employee Benefit Trust (Under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Sub-Total (C)(2)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
	Total Non Promoter-Non Public Shareholding (C)=(C)(1)+(C)(2)	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0



KRBL Limited

Table V: Statement showing details of Significant Beneficial Owner

Sr. No.	Details of the Significant Beneficial Owner					Details of the Registered Owner					Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect*					Date of creation / acquisition of significant influence
	Name	PAN	Passport No. in case of a foreign national	Nationality	Nationality (Applicable in case of Any other is selected)	Name	PAN	Passport No. in case of a foreign national	Nationality	Nationality (Applicable in case of Any other is selected)	Whether by virtue of:					
											Shares	Voting rights	Rights on distributable dividend or any other distribution	Exercise of Control	Exercise of significant influence	
1	ANIL KUMAR MITTAL AS TRUSTEE OF ANIL MITTAL FAMILY TRUST	AALPM8403A		INDIAN		ANIL MITTAL FAMILY TRUST	AAFTA5146G		INDIAN		18.40	0	0	NO	NO	12-01-2017
2	ANIL KUMAR MITTAL AS KARTA OF ANIL KUMAR MITTAL HUF	AALPM8403A		INDIAN		ANIL KUMAR MITTAL HUF	AAHA6040E		INDIAN		1.53	0	0	NO	NO	29-06-1993
3	ARUN KUMAR GUPTA AS TRUSTEE OF ARUN KUMAR GUPTA FAMILY TRUST	AAHPG0447Q		INDIAN		ARUN KUMAR GUPTA FAMILY TRUST	AAFTA6022K		INDIAN		17.87	0	0	NO	NO	20-02-2017
4	ARUN KUMAR GUPTA AS KARTA OF ARUN KUMAR GUPTA HUF	AAHPG0447Q		INDIAN		ARUN KUMAR GUPTA HUF	AAHA6042G		INDIAN		2.06	0	0	NO	NO	29-06-1993
5	ANOOOP KUMAR GUPTA AS TRUSTEE OF ANOOOP KUMAR GUPTA FAMILY TRUST	AAHPG6768N		INDIAN		ANOOOP KUMAR GUPTA FAMILY TRUST	AAFTA5145F		INDIAN		16.50	0	0	NO	NO	12-01-2017
6	ANOOOP KUMAR GUPTA AS KARTA OF ANOOOP KUMAR GUPTA HUF	AAHPG6768N		INDIAN		ANOOOP KUMAR GUPTA HUF	AAHA6041F		INDIAN		3.10	0	0	NO	NO	30-08-1993
7	ANOOOP KUMAR GUPTA AS TRUSTEE OF BINITA GUPTA FAMILY TRUST	AAHPG6768N		INDIAN		BINITA GUPTA FAMILY TRUST	AACTB8887C		INDIAN		0.33	0	0	NO	NO	03-12-2019



To
KRBL Limited
5190, Lahori Gate,
Delhi – 110006

Date: 13 April 2022

Subject: Annual confirmation of compliance pursuant to specific exemption granted under Regulations 11 of the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 ("Takeover Regulations") to Anil Kumar Mittal Family Trust, Arun Kumar Gupta Family Trust and Anoop Kumar Gupta Family Trust vide SEBI order no. "SEBI/ WTM/ SR/ CFD-DCR/58/09/2017" dated September 05, 2017, ("SEBI Order")

Dear Sir,

In exercise of the powers conferred upon SEBI under Section 19 of the Securities and Exchange Board of India Act, 1992 read with Regulation 11(5) of the Takeover Regulations, SEBI has granted an exemption to Anil Kumar Mittal Family Trust, Arun Kumar Gupta Family Trust and Anoop Kumar Gupta Family Trust from complying with the requirements of Regulation 3 and Regulation 4 of the Takeover Regulations with respect to its proposed acquisition/ exercise of voting rights in the target company i.e. KRBL Limited.

As per the conditions specified in Para 4.2 point viii of aforementioned SEBI exemption order, we, Mr. Anil Kumar Mittal, Mr. Arun Kumar Gupta and Mr. Anoop Kumar Gupta, acting on behalf of Anil Kumar Mittal Family Trust, Arun Kumar Gupta Family Trust and Anoop Kumar Gupta Family Trust, respectively, hereby confirm that we are in compliance of the said order for the year ending 31 March 2022.

Please take the above confirmation in records of the company and kindly annex the confirmation with the Shareholding Pattern for the quarter ending 31 March 2022.

Thanking You
Yours Faithfully


Anil Kumar Mittal
(Trustee - Anil Mittal Family Trust)
Place: Delhi


Arun Kumar Gupta
(Trustee – Arun Kumar Gupta Family Trust)
Place: Delhi


Anoop Kumar Gupta
(Trustee – Anoop Kumar Gupta Family Trust)
Place: Delhi

SPMR & ASSOCIATES

Chartered Accountants

A-121, First Floor, Vikas Marg, Shakarpur,
New Delhi-110092

Phone: 011-43038609, 9810520651

Mail: akmittalca1972@gmail.com

Independent Auditor's Certificate

To

**Anil Mittal Family Trust,
J-207, Saket, New Delhi - 110017**

Date: April' 15th, 2022

Auditor's Annual Compliance Certificate for Anil Mittal Family Trust ("Trust") – KRBL Limited

As per information provided, explanation furnished and other records produced before us by Anil Mittal Family Trust this is to state that as at March 31, 2022, Anil Mittal Family Trust holds 18.40% of the share capital of KRBL Limited.

Trust's Responsibility

1. The Trustees of the Trust are responsible for ensuring that the Acquirer (i.e. Trust) complies with the requirement of SEBI order no. "SEBI/ WTM/ SR/ CFD-DCR/58/09/2017" dated September 05, 2017, ("SEBI Order") and for providing all relevant information and disclosures to the SEBI.

Auditor's Responsibility

2. Pursuant to the requirement enlisted in the SEBI Order, our responsibility is to express opinion based on examination of records and discussion with the Management to whether the Trust has complied with specific conditions of SEBI order.
3. For the purpose of our certification, we have reviewed the relevant documents and disclosures provided by the Management. The key documents reviewed by us have been enlisted in the Annexure-I (enclosed).
4. Based on our review of the documents and disclosures, the details of the compliance made by the Trust in accordance of Para 4.2 of SEBI Order for the year ending March 31, 2022 are as follows:
 - a) The acquisition of shares of KRBL Limited has been in accordance with the applicable provisions of Companies Act, 2013;



- b) There has been no change in the Trustees and beneficiaries of Anil Mittal Family Trust as comparison to previous year.
- c) The Acquirer has filed an annual confirmation with KRBL Limited on **April 13, 2022** confirming that they are in compliance with the provisions of SEBI exemption order.
5. We have conducted our examination in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

Opinion

6. Based on our examination of records and the information and explanations given to us, we are of the opinion that the Trust has complied with the conditions listed in para 4.2 of the SEBI Order.

Restriction on Use

7. This certificate has been prepared at the request of the Trust solely with reference to the SEBI Order. It should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care or for any other purpose or to any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

**For SPMR & Associates
Chartered Accountants
FRN 07578N**



Ajay Kumar Mittal
**Ajay Kumar Mittal
Partner
M. No. 095273**

UDIN: 22095273AHCWUZ4220

Enclosed: Annexure-I

Anil Mittal Family Trust

Annexure-I

Key Documents reviewed for the purpose of certification:

1. SEBI order no. ("SEBI/ WTM/ SR/ CFD-DCR/58/09/2017") dated September 05, 2017 in relation to KRBL Limited.
2. Report filed by the Acquirer in compliance of the SEBI exemption order detailing the disclosures regarding indirect acquisition (para 4.2.ii of the SEBI Order).
3. The annual compliance confirmation status letter filed by the Acquirer to KRBL Limited (para 4.2.vii of the SEBI Order).
4. Trust deed of Anil Mittal Family Trust along with the deed of amendment for Anil Mittal Family Trust.

**For SPMR & Associates
Chartered Accountants**

FRN 07578N



**Ajay Kumar Mittal
Partner
M. No. 095273**

UDIN: 22095273AHCWUZ4220

Date : 15-04-2022

SPMR & ASSOCIATES

Chartered Accountants

A-121, First Floor, Vikas Marg, Shakarpur,
New Delhi-110092

Phone: 011-43038609, 9810520651

Mail: akmittalca1972@gmail.com

Independent Auditor's Certificate

To

**Arun Kumar Gupta Family Trust,
KH No. 239 Rajokari Farm No 4, Bougianvilla,
Rajokri, New Delhi – 110038**

Date: April' 15th, 2022

Auditor's Annual Compliance Certificate for Arun Kumar Gupta Family Trust ("Trust") – KRBL Limited

As per information provided, explanation furnished and other records produced before us by Arun Kumar Gupta Family Trust this is to state that as at March 31, 2022, Arun Kumar Gupta Family Trust holds 17.87% of the share capital of KRBL Limited.

Trust's Responsibility

1. The Trustees of the Trust are responsible for ensuring that the Acquirer (i.e. Trust) complies with the requirement of SEBI order no. "SEBI/ WTM/ SR/ CFD-DCR/58/09/2017" dated September 05, 2017, ("SEBI Order") and for providing all relevant information and disclosures to the SEBI.

Auditor's Responsibility

2. Pursuant to the requirement enlisted in the SEBI Order, our responsibility is to express opinion based on examination of records and discussion with the Management to whether the Trust has complied with specific conditions of SEBI order.
3. For the purpose of our certification, we have reviewed the relevant documents and disclosures provided by the Management. The key documents reviewed by us have been enlisted in the Annexure-I (*enclosed*).
4. Based on our review of the documents and disclosures, the details of the compliance made by the Trust in accordance of Para 4.2 of SEBI Order for the year ending March 31, 2022 are as follows:
 - a) The acquisition of shares of KRBL Limited has been in accordance with the applicable provisions of Companies Act, 2013;



- b) There has been no change in the Trustees and beneficiaries of Arun Kumar Gupta Family Trust as comparison to previous year.
- c) The Acquirer has filed an annual confirmation with KRBL Limited on **April 13, 2022** confirming that they are in compliance with the provisions of SEBI exemption order.
5. We have conducted our examination in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

Opinion

6. Based on our examination of records and the information and explanations given to us, we are of the opinion that the Trust has complied with the conditions listed in para 4.2 of the SEBI Order.

Restriction on Use

7. This certificate has been prepared at the request of the Trust solely with reference to the SEBI Order. It should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care or for any other purpose or to any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

**For SPMR & Associates
Chartered Accountants**

FRN 07578N



**Ajay Kumar Mittal
Partner**

M. No. 095273

UDIN: 22095273AHCYDT3504

Enclosed: Annexure-I

Arun Kumar Gupta Family Trust

Annexure-I

Key Documents reviewed for the purpose of certification:

1. SEBI order no. ("SEBI/ WTM/ SR/ CFD-DCR/58/09/2017") dated September 05, 2017 in relation to KRBL Limited.
2. Report filed by the Acquirer in compliance of the SEBI exemption order detailing the disclosures regarding indirect acquisition (*para 4.2.ii of the SEBI Order*).
3. The annual compliance confirmation status letter filed by the Acquirer to KRBL Limited (*para 4.2.vii of the SEBI Order*).
4. Trust deed of Arun Kumar Gupta Family Trust along with the deed of amendment for Arun Kumar Gupta Family Trust.

**For SPMR & Associates
Chartered Accountants
FRN 07578N**



**Ajay Kumar Mittal
Partner
M. No. 095273**

UDIN: 22095273AHCYDT3504

Date : 15-04-2022

SPMR & ASSOCIATES

Chartered Accountants

A-121, First Floor, Vikas Marg, Shakarpur,
New Delhi-110092

Phone: 011-43038609, 9810520651

Mail: akmittalca1972@gmail.com

Independent Auditor's Certificate

To

**Anoop Kumar Gupta Family Trust,
F-208, Sainik Farms, New Delhi- 110062**

Date: April' 15th, 2022

Auditor's Annual Compliance Certificate for Anoop Kumar Gupta Family Trust ("Trust") – KRBL Limited

As per information provided, explanation furnished and other records produced before us by Anoop Kumar Gupta Family Trust this is to state that as at March 31, 2022, Anoop Kumar Gupta Family Trust holds 16.50% of the share capital of KRBL Limited.

Trust's Responsibility

1. The Trustees of the Trust are responsible for ensuring that the Acquirer (i.e. Trust) complies with the requirement of SEBI order no. "SEBI/ WTM/ SR/ CFD-DCR/58/09/2017" dated September 05, 2017, ("SEBI Order") and for providing all relevant information and disclosures to the SEBI.

Auditor's Responsibility

2. Pursuant to the requirement enlisted in the SEBI Order, our responsibility is to express opinion based on examination of records and discussion with the Management to whether the Trust has complied with specific conditions of SEBI order.
3. For the purpose of our certification, we have reviewed the relevant documents and disclosures provided by the Management. The key documents reviewed by us have been enlisted in the Annexure-I (*enclosed*).
4. Based on our review of the documents and disclosures, the details of the compliance made by the Trust in accordance of Para 4.2 of SEBI Order for the year ending March 31, 2022 are as follows:
 - a) The acquisition of shares of KRBL Limited has been in accordance with the applicable provisions of Companies Act, 2013;



- b) There has been no change in the Trustees and beneficiaries of Anoop Kumar Gupta Family Trust as comparison to previous year.
- c) The Acquirer has filed an annual confirmation with KRBL Limited on **April 13, 2022** confirming that they are in compliance with the provisions of SEBI exemption order.
5. We have conducted our examination in accordance with the Guidance Note on Reports or Certificates for Special Purposes issued by the Institute of Chartered Accountants of India. The Guidance Note requires that we comply with the ethical requirements of the Code of Ethics issued by the Institute of Chartered Accountants of India.

Opinion

6. Based on our examination of records and the information and explanations given to us, we are of the opinion that the Trust has complied with the conditions listed in para 4.2 of the SEBI Order.

Restriction on Use

7. This certificate has been prepared at the request of the Trust solely with reference to the SEBI Order. It should not be used by any other person or for any other purpose. Accordingly, we do not accept or assume any liability or any duty of care or for any other purpose or to any other party to whom it is shown or into whose hands it may come without our prior consent in writing.

**For SPMR & Associates
Chartered Accountants**

FRN 07578N



**Ajay Kumar Mittal
Partner**

M. No. 095273

UDIN: 22095273AHCXRQ3605

Enclosed: Annexure-I

Anoop Kumar Gupta Family Trust

Annexure-I

Key Documents reviewed for the purpose of certification:

1. SEBI order no. ("SEBI/ WTM/ SR/ CFD-DCR/58/09/2017") dated September 05, 2017 in relation to KRBL Limited.
2. Report filed by the Acquirer in compliance of the SEBI exemption order detailing the disclosures regarding indirect acquisition (*para 4.2.ii of the SEBI Order*).
3. The annual compliance confirmation status letter filed by the Acquirer to KRBL Limited (*para 4.2.vii of the SEBI Order*).
4. Trust deed of Anoop Kumar Gupta Family Trust along with the deed of amendment for Anoop Kumar Gupta Family Trust.

**For SPMR & Associates
Chartered Accountants**

FRN 07578N



**Ajay Kumar Mittal
Partner**

M. No. 095273

UDIN: 22095273AHCXRQ3605

Date : 15-04-2022