## WALCHANDNAGAR INDUSTRIES LIMITED AS PER CLAUSE 35 OF THE LISTING AGREEMENT FOR THE QUARTER ENDED 31ST DECEMBER 2008

| (I)(a)                 | AS ON: NSDL DATA:31/12/2008<br>STATEMENT SHOWING SHAREHOL<br>PATTERN                            | CDSL DATA:<br><b>DING</b>        | 31/12/2008                |   |                                    |                                      |
|------------------------|---|----------------------------------|---------------------------|---|------------------------------------|--------------------------------------|
| CATEGORY<br>CODE       | SCRIPT CODE : BSE 507410<br>CATEGORY OF SHAREHOLDERS  | NUMBER<br>OF<br>SHAREHO<br>LDERS | TOTAL<br>NO. OF<br>SHARES | NO. OF<br>SHARES<br>HELD IN<br>DEMATERIA<br>LIZED<br>FORM | TOTAL NU                           | DING AS A<br>TAGE OF                 |
|                        |   |                                  |                           |   | AS A<br>PERCENT<br>AGE OF<br>(A+B) | AS A<br>PERCENT<br>AGE OF<br>(A+B+C) |
| (A)                    | SHARE HOLDING OF PROMOTER<br>& PROMOTER GROUP   |                                  |                           |   |                                    |                                      |
| (1)                    |   | 17                               | 95790                     | 14000   | 0.2518                             | 0.2518                               |
|                        | BODIES CORPORATE  | - 5                              | -<br>15446160             | -<br>9926190  | -<br>40.5996                       | -<br>40.5996                         |
|                        |   | 1<br><b>23</b>                   | 379210<br><b>15921160</b> | 9940190   | 0.9967<br><b>41.8482</b>           | 0.9967<br><b>41.8482</b>             |
| (2)                    | FOREIGN<br>INDIVIDUAL (NON RESIDENT<br>INDIVIDUALS/ FOREIGN<br>INDIVIDUALS)<br>BODIES CORPORATE | 2                                | 5000000                   | 5000000   | 13.1423                            | 13.1423                              |
| (                      | INSTITUTIONS  | 2                                | 500000                    | 500000  | 13.1425                            | 13.1725                              |
|                        | SUB TOTAL (A) (2):  | 2                                | 5000000                   | 5000000   | 13.1423                            | 13.1423                              |
|                        | TOTAL SHAREHOLDING OF<br>PROMOTER AND PROMOTER<br>GROUP (A)=(A)(1)+(A)(2)                       | 25                               | 20921160                  | 14940190  | 54.9905                            | 54.9905                              |
| (B)<br>(1)             | PUBLIC SHAREHOLDING<br>INSTITUTIONS   |                                  |                           |   |                                    |                                      |
| i                      | MUTUTAL FUNDS / UTI<br>FINANCIAL INSTITUTIONS / BANKS<br>CENTRAL / STATE GOVERNMENT(S)          | 3<br>21<br>1                     | 95935<br>88360<br>12000   | 89435<br>65210  | 0.2522<br>0.2323<br>0.0315         | 0.2522<br>0.2323<br>0.0315           |
|                        | INSURANCE COMPANIES<br>FOREIGN INSTITUTUIONAL   | 2                                | 2698940                   | 2698940   | 7.0941                             | 7.0941                               |
| (                      | INVESTORS   | 5<br>RS                          | 196347                    | 196347  | 0.5161                             | 0.5161                               |
| I                      | ANY OTHER (SPECIFY)<br>SUB TOTAL (B) (1) :  | 32                               | 3091582                   | 3049932   | 8.1261                             | 8.1261                               |
| <b>(2)</b><br>(a<br>(b |   | 1173                             | 2194393                   | 2174063   | 5.7679                             | 5.7679                               |
|                        | HOLDING NORMINAL SHARE<br>CAPITAL UPTO TO Rs. 1 Lakh)   | 96280                            | 11173978                  | 9801238   | 29.3704                            | 29.3704                              |

| (C) | (ii) ( INDIVIDUAL SHAREHOLDERS<br>HOLDING NORMINAL SHARE<br>CAPITAL GREATER THAN Rs. 1 Lakh)<br>ANY OTHERS<br>CLEARING MEMBER<br>MARKET MAKER<br>OFFICE BEARERS | 2<br>270      | 103240<br>363974 | 50740<br>363974 | 0.2714<br>0.9567 | 0.2714<br>0.9567 |
|-----|---|---------------|------------------|-----------------|------------------|------------------|
|     | FOREIGN NATIONALS   | 2             | 6630             |                 | 0.0174           | 0.0174           |
|     | NON RESIDENT INDIANS (REPAT)<br>NON RESIDENT INDIANS (NON   | 331           | 141001           | 124661          | 0.3706           | 0.3706           |
|     | REPAT)  | 80            | 27912            | 27912           | 0.0734           | 0.0734           |
|     | OVERSEAS BODIES CORPORATES  | 2             | 5870             |                 | 0.0154           | 0.0154           |
|     | TRUSTS  | 6             | 15320            | 14920           | 0.0403           | 0.0403           |
|     | SUB TOTAL (B) (2) :   | 98146         | 14032318         | 12557508        | 36.8834          | 36.8834          |
|     | TOTAL PUBLIC SHAREHOLDING<br>(B)= (B) (1) + (B) (2)   | 98178         | 17123900         | 15607440        | 45.0095          | 45.0095          |
|     | SHARES HELD BY CUSTODIANS<br>AND AGAINST WHICH<br>DEPOSITORY RECEIPTS HAVE<br>BEEN ISSUED<br>SUB TOTAL (C) (1)  | 0             | 0                | 0               | 0.0000           | 0.0000           |
|     | GRAND TOTAL(A)+(B)+(C)  | <b>9820</b> 3 | 38045060         | 30547630        | <b>100.0000</b>  | <b>100.0000</b>  |
|     |   | <i>J</i> 0203 | 55045000         | 50547 050       | 100.0000         | 100.0000         |

NOTE :

(C)

1.NAME, NUMBER OF SHARES HELD & PERCENTAGE OF SHAREHOLDING OF ENTITIES/ PERSONS HOLDING MORE THAN 1% OF THE TOTAL SHARES OF THE COMPANY IS AS PER ANNEXURE

|  | WALCHANDNAGAR INDUSTRIES LI             | MITED    |                   |  |  |  |  |  |
|--|---|----------|-------------------|--|--|--|--|--|
| STATEMENT SHOWING SHARE HOLDING OF PERSONS BELONGING TO THE CATEGORY |   |          |                   |  |  |  |  |  |
| "PROMOTERS AND PROMOTER GROUP"                                       |   |          |                   |  |  |  |  |  |
|  |   |          |                   |  |  |  |  |  |
|  | Date : 31 <sup>st</sup> December 2008   | PAGE     | : 1<br>PERCENTAGE |  |  |  |  |  |
|  |   |          | TO TOTAL          |  |  |  |  |  |
| R NO   | NAME OF SHAREHOLDER                     | SHARES   | SHARES            |  |  |  |  |  |
| 1  | KAMDHENU COMMERCIAL PRIVATE LIMITED.    | 7847910  | 20.627            |  |  |  |  |  |
|  | GREAT ACHIEVERS TRADING COMPANY PVT.    |          |                   |  |  |  |  |  |
| 2  | LTD                                     | 5177880  | 13.609            |  |  |  |  |  |
| 3  | OLSSON HOLDINGS INC                     | 2000000  | 5.256             |  |  |  |  |  |
| 4  | RODIN HOLDINGS INC                      | 300000   | 7.885             |  |  |  |  |  |
| 5  | DOSHI CHAMPA C.*                        | 379210   | 0.996             |  |  |  |  |  |
| 6  | CHIRANIKA TRADING PRIVATE LIMITED       | 342090   | 0.899             |  |  |  |  |  |
| 7  | GREAT ACHIEVERS TRADING COMPANY PRIVATE | 82280    | 0.216             |  |  |  |  |  |
|  | LIMITED.                                |          | 0.000             |  |  |  |  |  |
| 8  | KAMDHENU COMMERCIAL PRIVATE LIMITED.    | 1996000  | 5.246             |  |  |  |  |  |
| 9  | LALCHAND HIRACHAND                      | 8090     | 0.021             |  |  |  |  |  |
| 10   | LALCHAND HIRACHAND                      | 7200     | 0.018             |  |  |  |  |  |
| 11   | DOSHI CHAMPA C.                         | 7170     | 0.018             |  |  |  |  |  |
| 12   | DOSHI CHAMPA CHAKOR                     | 3180     | 0.008             |  |  |  |  |  |
| 13   | SHRI LALCHAND HIRACHAND                 | 120      | 0.000             |  |  |  |  |  |
| 14   | LALCHAND HIRACHAND                      | 90       | 0.000             |  |  |  |  |  |
| 15   | LALITABAI LALCHAND                      | 10       | 0.000             |  |  |  |  |  |
| 16   | CHIRAG C DOSHI                          | 14000    | 0.036             |  |  |  |  |  |
|  | CHAKOR L DOSHI                          |          | 0.000             |  |  |  |  |  |
|  | CHAMPA C DOSHI                          |          | 0.000             |  |  |  |  |  |
| 17   | DOSHI CHAKOR LALCHAND                   | 12500    | 0.032             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
|  | DOSHI KANIKA CHAKOR                     |          | 0.000             |  |  |  |  |  |
| 18   | DOSHI CHAKOR LALCHAND                   | 12250    | 0.032             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
|  | DOSHI CHIRAG CHAKOR                     |          | 0.000             |  |  |  |  |  |
| 19   | CHAKOR L DOSHI                          | 10000    | 0.026             |  |  |  |  |  |
|  | CHAMPA C DOSHI                          |          | 0.000             |  |  |  |  |  |
|  | CHIRAG C DOSHI                          |          | 0.000             |  |  |  |  |  |
| 20   | DOSHI CHAKOR L.                         | 5000     | 0.013             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
|  | GANDHI ARUNKUMAR RAMANLAL               |          | 0.000             |  |  |  |  |  |
| 21   | DOSHI CHAKOR L.                         | 5000     | 0.013             |  |  |  |  |  |
|  | DOSHI CHAMPA C.                         |          | 0.000             |  |  |  |  |  |
|  | DAFTARI SHARAYU                         |          | 0.000             |  |  |  |  |  |
| 22   | DOSHI CHAKOR L.                         | 5000     | 0.013             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
|  | BASU P.K.                               |          | 0.000             |  |  |  |  |  |
| 23   | DOSHI CHAKOR LALCHAND                   | 2500     | 0.006             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
| 24   | DOSHI CHAKOR L                          | 2000     | 0.005             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          | 0.000             |  |  |  |  |  |
| 25   | DOSHI CHAKOR LALCHAND                   | 1680     | 0.004             |  |  |  |  |  |
|  | DOSHI CHAMPA CHAKOR                     |          |                   |  |  |  |  |  |
|  | TOTAL                                   | 20921160 | 54.990            |  |  |  |  |  |

\* shares registered in the name of

Note : individuals (Trustees) Smt. Lalitabai Lalchand Charity Trust

| (I) (C)     | Statement    | showing   | Shareh | olding | g of  | persons | belo | onging | to | the | category |
|-------------|--------------|-----------|--------|--------|-------|---------|------|--------|----|-----|----------|
| "Public" an | nd holding r | more than | 1% of  | the t  | total | number  | of s | shares |    |     |          |

|       | WALCHANDNAGAR INDUSTRIES LTD.          |            |            |            |
|-------|--|------------|------------|------------|
|       |  |            |            |            |
|       | STATEMENT SHOWING SHARE HOLDING OF     |            |            |            |
|       | PERSONS                                | BELONGING  | TO THE CAS | FEGORY     |
|       | "PUBLIC" AND HOLDING MORE THAN 1% OF   |            |            |            |
|       | THE                                    | TOTAL NUME | ER OF SHAR | ES         |
|       | Date : 31 <sup>st</sup> December 2008  |            | PAGE       | : 1        |
|       |  |            |            |            |
|       |  |            |            | PERCENTAGE |
|       |  |            |            | TO TOTAL   |
| SR.NO | NAME OF SHAREHOLDER                    |            | SHARES     | SHARES     |
| 1     | LIFE INSURANCE CORPORATION OF INDIA    |            | 2113390    | 5.5550     |
| 2     | THE ORIENTAL INSURANCE COMPANY LIMITED |            | 585550     | 1.5391     |
| 3     | SEA GLIMPSE INVESTMENTS PVT LTD        |            | 400000     | 1.0514     |
|       | TOTAL :                                |            | 3098940    | 8.1454     |

(I) (d) Statement showing details of locked-in shares

| Sr.<br>No. | Name of the<br>shareholder              | Category | Number of<br>locked-in<br>shares | Locked-in shares as a<br>percentage of total<br>number of shares<br>{i.e., Grand Total<br>(A)+(B)+(C) indicated<br>in Statement at para<br>(I)(a) above} |
|------------|---|----------|----------------------------------|--|
| 1.         | Olsson Holding Inc                      | Promoter | 200000                           | 5.2569   |
| 2.         | Kamdhenu Commercials<br>Private Limited | Promoter | 3000000                          | 7.8854   |
| 3.         | Rodin Holdings Inc                      | Promoter | 2609012                          | 6.8577   |
| TOT        | AL                                      |          | 7609012                          | 20.0000  |

| (II) (a) | Statement | showing | details | of | Depository | Receipts | (DRs) |
|----------|-----------|---------|---------|----|------------|----------|-------|
|----------|-----------|---------|---------|----|------------|----------|-------|

| No.  | outsta<br>DR (AD<br>GDRs, | nding<br>Rs, | of<br>outstand<br>ing DRs | shares<br>underlying<br>outstanding | Shares underlying outstanding DRs as a<br>percentage of total number of shares<br>{i.e., Grand Total (A)+(B)+(C) indicated<br>in Statement at para (I)(a) above} |
|------|---------------------------|--------------|---------------------------|-------------------------------------|--|
|      | etc.)                     |              |                           | DRs                                 |  |
| 1.   |                           |              |                           | 0                                   | 0  |
| 2.   |                           |              |                           |                                     |  |
| TOTA | ΥL                        |              |                           |                                     |  |

(II)(b) <u>Statement showing Holding of Depository Receipts</u> (DRs), where underlying shares are in excess of 1% of the total number of shares

|      | of the<br>DR<br>Holder | outstandin<br>g DR<br>(ADRs,<br>GDRs, | shares<br>underlyin | Shares underlying outstanding DRs as a<br>percentage of total number of shares {i.e.,<br>Grand Total (A)+(B)+(C) indicated in Statement<br>at para (I)(a) above} |
|------|------------------------|---------------------------------------|---------------------|--|
| 1.   |                        |                                       | 0                   | 0  |
| 2.   |                        |                                       |                     |  |
| TOTA | L                      |                                       |                     |  |