

A 143

# EASTERN INVESTMENTS LTD.

(Under Administrative Control of Government of India, Ministry of Steel)

## इष्टार्न इनवेष्टमेन्ट लिमिटेड

(इस्पात मन्त्रालय, भारत सरकार के प्रसासनिक नियन्त्राधीन)

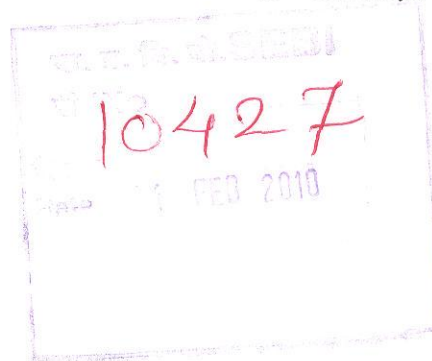
BIRD GROUP

बर्ड ग्रुप

Ref  
112

Manager  
Corporation Finance Dept, DCR-II  
Securities and Exchange Board of India,  
Plot No.C-4,-A, "G" Block  
Bandra Kurla Complex, Bandra (East)  
Mumbai-400 051

29<sup>th</sup> January, 2010



Dear Sir,

**Subject: Request for No action under the SEBI ( Informal Guidance) Scheme, 2003 – Applicability of the provisions of SEBI SEBI (Substantial Acquisition of Shares and Takeovers) Regulation, 1997 (Takeover Regulation)**

This has reference to your letter No.CFD/DCR/SKS/SG/19209/10 dated 22.01.2010.

As required, the Shareholding patterns of OMDC, BSLC and EIL is enclosed herewith as Annexure- A1,A2 & A3 respectively.

In respect of concept of group companies amongst the transferee(s) and transferor(s) companies under 3(1)(e)(i) of Takeover Regulations, the followings are note worthy:

- (a) Composition of Board of Directors : OMDC is having five directors, BSLC and EIL each are having four directors on their Board. Except one director in OMDC other four directors are common to all the three companies. Thus, the concept of "Group" as defined in The MRTP Act, 1969 is established.

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(b) Shareholdings : Existing shareholding of EIL in OMDC and BSLC are 33.98% and 40.45% respectively.

(c) Disclosure in Annual Reports 2008-09 : Page 49 of Annual Report of EIL, page 38 of Annual Report of BSLC and page 60 of Annual Report of OMDC have disclosed other companies as associate/ group companies.

Thanking you,

Yours faithfully  
For Eastern Investments Ltd



(J Banerjee)  
Company Secretary

Encl : As above