

Krebs Biochemicals & Industries Limited

8-2-577/B, Plot No. 34, 3rd Floor, Maas Heights, Road No. 8, Banjara Hills, Hyderabad-500 034

CIN : L24110TG1991PLCO13511



18th July, 2016

To,
Mr. Pranav H Variava,
Corporate Finance Department,
Securities and Exchange Board of India,
Plot No. C4-A, G Block,
Bandra Kurla Complex, Bandra (E),
Mumbai- 400051.

Dear Sir,

Sub: Request for informal guidance under the provisions of SEBI (Informal Guidance) Scheme, 2003, with regard to re-classification of promoters.

Ref: Regulation 31A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Your letter dated 27th June, 2016.

1. Background of the Company:

Krebs Biochemicals & Industries Limited (KBIL) was incorporated on 2nd December, 1991, under the provisions of the Companies Act, 1956. The company is engaged in the manufacturing and marketing of fermentation based biotech APIs with its manufacturing facilities situated at Vishakapatnam and Nellore in the state of Andhra Pradesh.

The company went public in the year 1994 and its shares listed on BSE Limited and the National Stock Exchange of India Limited.

2. Promoters of the Company

The list of promoters as on 18th June, 2016 is as below:

S.No	Name of the promoter	No. Of shares held
1.	Dr Ravindranath Tagore Ravi	198416
2.	Avinash Ravi	1589505
3.	Hemalata Ravi	2224400
4.	Aditya Ravi	8820
5.	Ajay Ravi	93300
6.	Ipca Laboratories Limited	4100100
7.	Jawaharlal Jasthi	Nil
8.	Mohammad Vahidullah	Nil
9.	Talasila Vijayalakshmi	Nil
10.	Sunkara Hari Ranga Rao	Nil
11.	Sunkara Lakshmi Parvati	Nil



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12.	Sambasiva Rao Ravi	Nil
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(Table I)

The company has received requests from the below members belonging to the promoter group for re-classification from promoter to public category.

S.No	Name of the promoter	No. Of shares held
1.	Jawaharlal Jasti	Nil
2.	Mohammad Vahidullah	Nil
3.	Talasila Vijayalakshmi	Nil
4.	Sunkara Hari Rangarao	Nil
5.	Sunkara Lakshmi Parvati	Nil
6.	Sambasiva Rao Ravi	Nil

(Table II)

After the proposed re-classification, the following would be the promoters of the company.

S.No	Name of the promoter	No. Of shares
1.	Dr Ravindranath Tagore Ravi	198416
2.	Avinash Ravi	1589505
3.	Hemalata Ravi	2224400
4.	Aditya Ravi	8820
5.	Ajay Ravi	93300
6.	Ipca Laboratories Limited	4100100
	Total	8214541

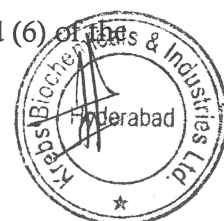
(Table III)

- We are in process of making an application under Regulation 31A (2) & (3) of SEBI (LODR) Regulations (hereinafter referred as "Listing Regulations", to BSE and NSE for the proposed re-classification of the said promoters mentioned in table II, to public.

The conditions under Sub-regulation 7 (a), (b) & (c) of Regulation 31A of the Listing Regulations are complied by the company.

- The relevant extract of Regulation 31A sub-regulation (5) & (6) is attached to this letter.
- We herewith submit to you that the said re-classification of promoters is not pursuant to Regulation 31A (5) or (6) of the Listing Regulations. Since the promoters mentioned in table II of point 2 are willing to exit the promoter group, the re-classification is being proposed.
- We also submit to you that the promoters mentioned in table II of point 2 are not holding any shares in the company and are not holding any control over the affairs and management of the company.
- However, clarity on the requirement of obtaining shareholders approval for the re-classification is needed.

In our opinion, since the re-classification is not pursuant to Sub-regulation (5) and (6) of Regulation 31A of the listing regulations, approval of shareholders is not required.



8. In view of the above points, we hereby request you to provide us an "informal guidance" as to whether the company has to still obtain the approval of the shareholders, so that a relevant application can be made to the stock exchanges.
9. We herewith also attach a cheque drawn in favour of "Securities and Exchange Board of India" bearing no. 002717 for an amount of Rs. 25,000/- (Twenty Five Thousand Only) towards fees for obtaining informal guidance, which has been inadvertently missed to be accompanied with the earlier application.

Kindly acknowledge.

Thanking you,

Yours faithfully,
For Krebs Biochemicals & Industries Limited


Haritha Varanasi
Company Secretary

