

# DOLAT ALGOTECH LIMITED

(FORMERLY KNOWN AS DOLAT INVESTMENTS LIMITED)

Corporate Office: 301-308, Bhagwati House, Plot, A/19, Veera Desai, Andheri (West), Mumbai - 400 058  
TEL.: 91-22-2673 2602/03/04/65704167/68/69/70/71 FAX: 91-22-26732642,  
Website: [www.dolatinvest.com](http://www.dolatinvest.com), E-mail: [post@dolatinvest.com](mailto:post@dolatinvest.com) or [grievances@dolatinvest.com](mailto:grievances@dolatinvest.com)  
Corporate Identity Number: L67100GJ1983PLC126089

Date: 27<sup>th</sup> January, 2023

To,  
Chief General Manager,  
Corporate Finance Department,  
Securities and Exchange Board of India,  
Plot No. C4-A, G Block,  
Bandra Kurla Complex, Bandra (E),  
Mumbai-400051

Dear Sir/Madam,

**Sub: Request for informal guidance by way of interpretive letter under the provisions of SEBI (Informal Guidance) Scheme, 2003, ("Scheme") with regard to submission of revised Shareholding Pattern**

**Ref: Regulation 31(4) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI LODR Regulations")**

Upon receipt of request from Dolat Group Master Trust, we would like to submit following facts for your kind consideration and seek your guidance with respect to interpretation of Regulation 31(4) of SEBI LODR Regulations.

## A. Background and Material Facts

### 1. Background of the Company:

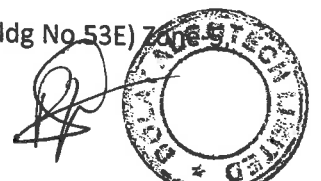
DOLAT ALGOTECH LIMITED ("DOLAT" or the "Company") having CIN L67100GJ1983PLC126089 was incorporated on 24/02/1983, under the provisions of the Companies Act, 1956. The Company is engaged in the business of shares and securities trading with its registered office situated at 1401-1409, Dalal Street Commercial Co-op Soc Ltd, Block 53 (Bldg No.53E) Zone-5, Road-5E, Gift city, Gandhinagar - 382355, Gujarat and corporate office at Bhagwati House, A/19, Veera Desai Road, Andheri (W), Mumbai 400058.

DOLAT is a public limited company. The equity shares of the Company are listed on BSE Limited ("BSE").

### 2. Promoters and Promoter Group of the Company and their shareholding:

The name of shareholders of the Company classified under the promoters and promoter group category and their shareholding as on 31.12.2022 are as below:

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Company on request of M/s. Dolat Group Master Trust, wants to revise the Shareholding pattern reflecting 'Dolat Group Master trust' with 'NIL' shareholding from March 2019 till December 2021 on Stock exchange i.e. BSE Ltd.

## 7. FEES

We are enclosing herewith a Demand Draft no. **028978** dated **23<sup>rd</sup> January, 2023** of Rs. **29,500/-** (Twenty Nine Thousand Five hundred only) (includes GST 18%) in favour of "Securities and Exchange Board of India" drawn on **ICICI Bank Ltd** towards fees for obtaining informal guidance as per the requirement of the Scheme.

## 8. Confidentiality of request

We request you to provide the Confidential treatment to the above request for a period of 90 days from the date of department's response.

Your early response to our request will be highly appreciated.

Thanking you,

Yours faithfully,

For DOLAT AGOTECH LIMITED



Pankaj D. Shah

Managing Director

DIN NO: 00005023

Encl: DD No. 028978

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## 4. Shareholding of Dolat Group Master Trust

Dolat group master trust has **NIL** shareholding in 'Dolat Algotech Limited' (the 'Company') since date of its formation on 21<sup>st</sup> February, 2019 till 10000 equity shares were purchased of the **Dolat Algotech Limited** on September 21, 2022 by Dolat Group Master Trust.

We would like to bring to notice that the Company has filed Shareholding Pattern under Regulation 31 of SEBI (LODR) Regulations, 2015 reflecting **DOLAT GROUP MASTER TRUST** with NIL shareholding in Promoter and promoter group category for quarter ended June, 2022.

Further the Company has also filed revised Shareholding Pattern retrospectively for quarter ended March 31, 2022 reflecting **DOLAT GROUP MASTER TRUST** with NIL shareholding in Promoter and promoter Group Category.

Subsequent to purchase of 10,000 equity shares of 'Dolat Algotech Limited' on September 21, 2022 from the open market by **DOLAT GROUP MASTER TRUST**, the Company in its shareholding pattern filed with BSE Limited for quarter ended September 30, 2022 and December 31, 2022 reflected **DOLAT GROUP MASTER TRUST** in Promoter and promoter group category with 10,000 equity shares (0.01 %).

## 5. Relevant legal provisions:

### a. 31. Holding of specified securities and shareholding pattern.:

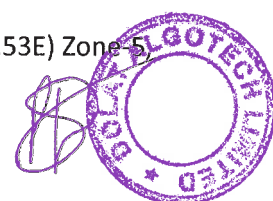
31(4) All entities falling under promoter and promoter group shall be disclosed separately in the shareholding pattern appearing on the website of all stock exchanges having nationwide trading terminals where the specified securities of the entity are listed, in accordance with the formats specified by the Board.

## 6. Query

On the basis of the aforementioned background, material facts and relevant legal provisions, we request you to provide the informal guidance by of interpretive letter on following queries:

1. 'Dolat Group Master trust' being part of promoter group since 21<sup>st</sup> February, 2019 and due to NIL shareholding, '**Dolat Group Master Trust**' was not reflected in the Shareholding Pattern filed by the company for the relevant quarters (March 2019 till December 2021).

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Promoter group Trust have come into existence on 21<sup>st</sup> February, 2019.

Settlor, Trustees and beneficiaries of **DOLAT GROUP MASTER TRUST** are the family members. Trustees and Settlor of **DOLAT GROUP MASTER TRUST** are provided in Table II and details of Beneficiaries of **DOLAT GROUP MASTER TRUST** are provided in Table III herewith:

**Table II : Trustee and settlor of DOLAT GROUP MASTER TRUST :**

SR NO	Name	Designation
1	Mrs. Dulariben D. Shah	Settlor
2	Mr. Harendra D. Shah	Trustee
3	Mr. Pankaj D. Shah	Trustee
4	Mr. Rajendra D. Shah	Trustee
5	Mr. Shailesh D. Shah	Trustee

**Table III : Details of beneficiaries of DOLAT GROUP MASTER TRUST**

SR NO	NAME OF BENEFICIARIES	Type of trust	DISTRIBUTION RATIO	NAME OF TRUSTEES
1	HARENDRA SHAH FAMILY TRUST	Discretionary trust	25%	Mr. Harendra D. Shah Mrs. Harsha H. Shah
2	PANKAJ SHAH FAMILY TRUST	Discretionary trust	25%	Mr. Pankaj D. Shah Mrs. Nirupama P. Shah
3	RAJENDRA SHAH FAMILY TRUST	Discretionary trust	25%	Mr. Rajendra D. Shah Mrs. Shilpa R. Shah
4	SHAILESH SHAH FAMILY TRUST	Discretionary trust	25%	Mr. Shailesh D. Shah Mrs. Rajul S. Shah

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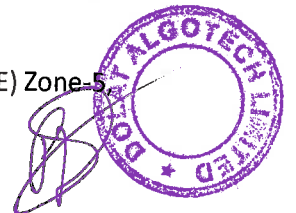
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15	POOJA VAIBHAV SHAH	100	0.00
16	NEHA PURVAG SHAH	100	0.00
17	POOJA JIGAR SHAH	100	0.00
18	HARENDRA DOLATRAI SHAH, RAJENDRA DOLATRAI SHAH, PANKAJ DOLATRAI SHAH AND SHAILESH DOLATRAI SHAH (TRUSTEES OF DOLAT GROUP MASTER TRUST)	10,000	0.01
19	DOLAT CAPITAL MARKET PVT. LTD.	7,28,49,770	41.39
20	PURVAG COMMODITIES AND DERIVATIVES PVT. LTD.	1,65,63,124	9.41
21	JIGAR COMMODITIES AND DERIVATIVES PVT LTD	1,61,59,218	9.18
22	SHAILESH SHAH SECURITIES PRIVATE LIMITED	46,50,000	2.64
23	NIRSHILP COMMODITIES AND TRADING PRIVATE LIMITED	26,64,206	1.51
24	NIRPAN SECURITIES PVT.LTD.	1,34,000	0.08
	<b>Total</b>	<b>13,11,04,059</b>	<b>74.49</b>

### 3. Establishment of Family trust by Promoters and promoter group of the company

Promoters and promoter group of the company have established private family trust (Irrevocable Specific trust) known as 'DOLAT GROUP MASTER TRUST' ("Promoter group Trust") for exclusive benefit and providing a suitable succession planning between the members of promoter / Promoter group for ensuring seamless intergenerational transfer of the trust funds and benefits amongst the family member which are immediate relatives of promoters including lineal descendants.

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**Table- I**

Sr No.	Name of the Persons classified under promoters and promoter Group category	No. of Equity shares held	% of Shareholding
1	HARENDRA D SHAH	45,18,111	2.57
2	SHAILESH D SHAH	45,18,110	2.57
3	PANKAJ D SHAH	45,18,110	2.57
4	RAJENDRA D SHAH	45,18,110	2.57
5	HARSHA H SHAH	100	0.00
6	SHILPA R SHAH	100	0.00
7	RAJUL S SHAH	100	0.00
8	NIRUPAMA P SHAH	100	0.00
9	VAIBHAV PANKAJ SHAH	100	0.00
10	PURVAG S SHAH	100	0.00
11	AMISHI H SHAH	100	0.00
12	KHYATI H SHAH	100	0.00
13	JIGAR P SHAH	100	0.00
14	DHAVAL R SHAH	100	0.00

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