

Date: 26th May, 2011

To,
Securities & Exchange Board of India
Corporate Finance Department
SEBI Bhawan
Plot No. C-4A, 'G' Block,
Bandra Kurla Complex,
Bandra (E),
Mumbai - 400 051

Sub: Clarification/reply towards the points as per your communiqué through your e-mail in formal guidance under SEBI (Informal Guidance) Scheme, 2003 regarding exemption of acquisitions of Shares by Qualifying Promoter under regulation 3(1)(e) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 1997 (SAST Regulations)

K.A.: Ms. Shameen Ahmed

Dear Madam,

We are in receipt of your e-mail asking clarification as regards the relationship of Mr. Rahul Bankda with Strand Developers Pvt. Ltd. In this regard we would like to clarify that Mr. Rahul Bankda forms part of the Promoter Group of M/s. Strand Developers Pvt. Ltd., as his brother and cousin are holding 100% shares of M/s. Strand Developers Pvt. Ltd. Also he is holding the position of director in M/s. Strand Developers Pvt. Ltd.

Further as regards confidentiality of the matter we reproduce the clause no. 8 as per our original request letter for interpretative guidance on the matter as under:

"8. Owing to the nature of the query and its likely impact on markets, the subject matter and the content of the application for clarification may be treated as confidential."

We will be pleased to provide any additional information on hearing from you and will be available for personal discussion at your convenience, if necessary. You can also contact Mr. Devendra Maheshwari (+91 9303205362) and e-mail sfilfinance@gmail.com for any further details required on the matter concerned.

We would highly appreciate your immediate action in this matter.

Regards,

For Syncom Formulations India Limited

Authorised Signatory

Date: 29th June, 2011

To,

Securities & Exchange Board of India

Corporate Finance Department

SEBI Bhawan

Plot No. C-4A, 'G' Block,

Bandra Kurla Complex,

Bandra (E),

Mumbai - 400 051

Sub: Clarification/reply towards the points as per your communiqué through your e-mail in formal guidance under SEBI (Informal Guidance) Scheme, 2003 regarding exemption of acquisitions of Shares by Qualifying Promoter under regulation 3(1)(e) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 1997 (SAST Regulations)

K.A.: Ms. Shameen Ahmed

Dear Madam,

We are in receipt of your e-mail asking clarification as regards the relationship of Mr. Rahul Bankda with Strand Developers Pvt. Ltd. In this regard we have clarified earlier through our letter dated 26th May, 2011 Mr. Rahul Bankda forms part of the Promoter Group of M/s. Strand Developers Pvt. Ltd., as his brother and cousin are holding 100% shares of M/s. Strand Developers Pvt. Ltd. Also he is holding the position of director in M/s. Strand Developers Pvt. Ltd.

While replying to your clarification earlier we had considered the equity shares of face value of Rs. 1/- each, due to oversight we had not considered the equity share capital of the company having face value of Rs. 100/- each which has been rectified in our last reply dated 27th June, 2011. In this regard we regret the inconvenience caused due to inadvertent error from our end.

We will be pleased to provide any additional information on hearing from you and will be available for personal discussion at your convenience, if necessary. You can also contact Mr. Devendra Maheshwari (+91 9303205362) for any further details required on the matter concerned.

Regards,

For Syncom Formulations India Limited

Authorised Signatory

On Tue, Jun 28, 2011 at 11:06 AM, <shameena@sebi.gov.in> wrote:

Attention Mr.Devendra Maheswarii

1. This with reference to the Informal Guidance Application submitted to SEBI on March 2011 by Syncom Formulations (India) Limited).
2. In this regard, your attention drawn to your reply dated May 26, 2011, wherein it is stated that *Mr. Rahul Bankda forms part of the promoter group of M/s Strand Developers Limited, as his brother and cousin are holding 100% shares of M/s Strand Developers Pvt. Ltd.*
3. Further it is observed from your reply dated June 27, 2011, wherein it is stated that Mr.Ankur Bankda, Mr.Ankit Bankda were holding 50% each in the shareholding of Strand Developerd Pvt Ltd and Mr. Rahul

Bankda and Ms. Sulabh Banka is also holding 50% each in the shareholding of Strand Developer Pvt Ltd.

4. The aforesaid reply is contradictory to the reply dated May 26, 2011. In this regard you are advised to state the reasons of the same.

Date: 10th August, 2011

To,

Securities & Exchange Board of India

Corporate Finance Department

SEBI Bhawan

Plot No. C-4A, 'G' Block,

Bandra Kurla Complex,

Bandra (E),

Mumbai - 400 051

Sub: Clarification as regards voting rights of the shareholders of Strand Developers Private Limited in reference to our application for formal guidance under SEBI (Informal Guidance) Scheme, 2003 regarding exemption of acquisitions of Shares by Qualifying Promoter under regulation 3(1)(e) of the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 1997 (SAST Regulations)

K.A.: Ms. Shameen Ahmed

Dear Madam,

As per our tele-con on 08th August, 2011, you have sought for clarification as regards voting rights of the shareholders of Strand Developers Private Limited in the captioned matter. Please find the same as detailed herein under for your reference:

All shares in Strand Developers Private Limited have equal voting rights irrespective of their face value as laid down in its Articles of Association. The detailed break up of each shareholders voting right is as follows:

Name of Shareholder	No. of Shares held	Face Value	Paid up Capital	Voting Rights
Mr. Ankur Bankda	67,500	1	67,500	25.86 %
Mr. Ankit Bankda	67,500	1	67,500	25.86 %
Mr. Rahul Banda	63,000	100	6,300,000	24.14 %
Ms. Sulabh Banka	63,000	100	6,300,000	24.14 %
	261,000		12,735,000	100.00 %

We will be pleased to provide any additional information on hearing from you and will be available for personal discussion at your convenience, if necessary. You can also contact Mr. Devendra Maheshwari (+91 9303205362) for any further details required on the matter concerned.

We would highly appreciate your immediate action in this matter.

Regards,

For Syncom Formulations India Limited

-
*Devendra

Sr.
SYNCOM

,

Manager
FORMULATIONS

(INDIA)

Maheshwari*

Accounts
LIMITED