

October 29, 2014

**Mr. Hari K**  
Vice President  
National Stock Exchange of India Limited  
"Exchange Plaza"  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400 051  
Fax # 022 26598237/38

**BSE Limited**  
DCS-CRD  
1<sup>ST</sup> Floor, New Trading Ring, Rotunda  
Building, P.J. Towers, Dalal Street, Fort,  
Mumbai-400 001  
(Fax 022 22723121/2037/2041/3714/  
2039/2061)

Dear Sirs,

Re.: **GHCL Limited (BSE Code: 500171)****Subject: Disclosure under Regulation 13(6) of SEBI (Prohibition of Insider Trading) Regulations, 1992**

Pursuant to provisions of Regulation 13 (6) of SEBI (Prohibition of Insider Trading) Regulations, 1992, intimation be and is hereby given that following entities belonging to the promoter category have purchased equity shares of the Company from open market, as per details mentioned below.

Name of the promoter entities	No. of Equity Shares
1. GEMS Commercial Company Ltd.	29,000
2. Moderate Investment & Commercial Enterprises Ltd.	35,000
3. International Resources Ltd.	23,000
4. Hindustan commercial Company Ltd.	23,000
Total	1,10,000

Copy of the disclosures given by the aforesaid promoter entities are enclosed with this communication.

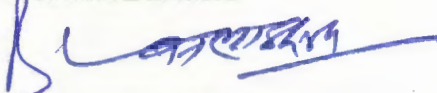
Copy of disclosure required under Regulation 13(6) of SEBI (Prohibition of Insider Trading) Regulation 1992, is enclosed herewith.

You are requested to kindly take on record.

Thanking you

Yours truly,

For GHCL Limited



Bhuwleshwar Mishra  
General Manager & Company Secretary  
Membership No. FCS 5330

**FORM D**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

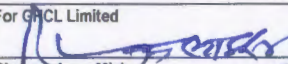
**[Regulation 13(4) and (6)]**

**Details of change in shareholding or voting rights held by Director or officer and his dependents or Promoter or Promoter or person who is part of Promoter Group of a Listed Company**

Name, PAN No. & Address of Promoter/Person who is part of Promoter Group/ Director/ officer	No. & % of shares / voting rights held by the Promoter /Person who is part of Promoter Group/ Director/ officer	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of intimation to company	Mode of acquisition (market purchase / public / rights / preferential offer, etc.) / Sale	No. & % of shares / voting rights post acquisition / sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
GEMS Commercial Company Limited, (PAN : AAACG4026H), Address: 9/14, (1st Floor), East Patel Nagar, New Delhi - 110008	28,62,207 equity shares (i.e., 2.86%)	27-10-2014	28-10-2014	Market purchase	28,91,207 equity shares (i.e., 2.89%)	K K Securities Ltd., (Reg. No. of TM (NSE INB230770030) & BSE: (INB010770031)	NSE	29,000 equity shares of GHCL Ltd.	Rs. 24,87,788.81/-	Nil	Nil
Moderate Investment & Commercial Enterprises Limited, (PAN : AAACM9104G, Address: 9/14, (2nd Floor), East Patel Nagar, New Delhi - 110008	5,70,050 equity shares (i.e., 0.57%)	27-10-2014	28-10-2014	Market purchase	6,05,050 equity shares (i.e., 0.61%)	K K Securities Ltd., (Reg. No. of TM (NSE INB230770030) & BSE: (INB010770031)	NSE	35,000 equity shares of GHCL Ltd.	Rs. 29,97,269.82/-	Nil	Nil
Hindustan Commercial Company Ltd., (PAN : AAACH2851B, Address: 9/14, (2nd Floor), East Patel Nagar, New Delhi - 110008	7,46,150 Equity Shares (i.e., 0.75%)	27-10-2014	28-10-2014	Market purchase	7,69,150 equity shares (i.e., 0.77%)	K K Securities Ltd., (Reg. No. of TM (NSE INB230770030) & BSE: (INB010770031)	NSE	23,000 equity shares of GHCL Ltd.	Rs. 19,69,634.22/-	Nil	Nil
International Resources Ltd., (PAN : AABC15633H, Address: 9/14, (2nd Floor), East Patel Nagar, New Delhi - 110008	5,52,671 Equity Shares (i.e., 0.55%)	27-10-2014	28-10-2014	Market purchase	5,75,671 equity shares (i.e., 0.58%)	K K Securities Ltd., (Reg. No. of TM (NSE INB230770030) & BSE: (INB010770031)	NSE	23,000 equity shares of GHCL Ltd.	Rs. 19,69,634.22/-	Nil	Nil

110000 Equity Shares purchased on NSE.

Note:- With the purchase of 110,000 Equity Shares by promoter entities, total holding of Promoter & Promoter Group stands increased from 1,81,82,658 equity shares (i.e., 18.08%) to 1,82,92,658 equity shares (i.e., 18.29%) of GHCL Ltd.

Place:	Noida	 For GHCL Limited Bhuvaneshwar Mishra General Manager & Company Secretary
Date:	29-10-2014	



# GEMS COMMERCIAL COMPANY LTD.

**Admin. Office:**

9/14, (First Floor) East Patel Nagar,  
New Delhi- 110008

Email: satishagarwal30762@gmail.com  
Ph: +911125769111 (Multiple Lines)

October 28, 2014

**National Stock Exchange of India  
Limited**  
"Exchange Plaza"  
Bandra – Kurla Complex,  
Bandra (E), Mumbai – 400 051  
Fax # 022 26598237/38

**BSE Limited**  
DCS - CRD  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J.  
Towers,  
Dalal Street, Fort, Mumbai – 400 001  
(Fax: 022 22723121/2037/2041/3714/2039/2061)

Dear Sirs,

**Re.: GHCL Limited (BSE Code: 500171)**

**Subject: Disclosure under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011**

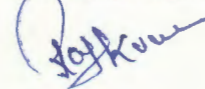
Pursuant to provisions of Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011, intimation be and is hereby given that we have purchased 29,000 equity shares of GHCL Limited from the open market.

Copy of disclosures required under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011 are enclosed herewith.

Thanking you

Yours faithfully

For Gems Commercial Co. Ltd.



**Raj Kumar**  
Director

**C.C**  
to GHCL LIMITED  
B-38, Institutional Area, Sector – 1, Noida (India)

# GEMS COMMERCIAL COMPANY LTD.

4/22

Admin. Office:

9/14, (First Floor) East Patel Nagar,

New Delhi- 110008

Email: satishagarwal30762@gmail.com

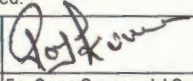
Ph: +911125769111 (Multiple Lines)

## FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

[Regulation 13(4A) and (6)]

Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Promoter or Person who is part of Promoter Group of a listed company

Name, PAN No. & Address of Promoter	No. & % of shares / voting rights held by the Promoter	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of intimation to company	Mode of acquisition (market purchase / public / rights / preferential offer, etc.) / Sale	No. & % of shares / voting rights post acquisition / sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
Gems Commercial Company Ltd (PAN:AAACG4026H), Address: 9/14 (First Floor), East Patel Nagar, New Delhi-110008	2862207 equity shares (i.e. 2.86%)	27/10/2014	28/10/2014	Market purchase	2891207 equity shares (2.89%)	K K Securities Limited, Registration No. of the TM - (NSE: INB230770030) & (BSE: INB010770031)	NSE & BSE	29000 equity shares of GHCL Limited	Rs. 24,87,788.81/-	Nil	Nil
29000 equity shares purchased on NSE and Nil Equity shares purchased on BSE											
Note: With the purchase of aforesaid number of shares, total holding of Promoter & Promoter Group stands increased.											
Place: New Delhi						Signature					
Date: 28/10/2014						Name	For Gems Commercial Company Ltd				
						Designation	Director				

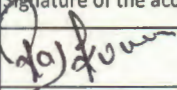
# GEMS COMMERCIAL COMPANY LTD.

**Admin. Office:**

9/14, (First Floor) East Patel Nagar,  
New Delhi- 110008

Email: sathishagarwal30762@gmail.com

Ph: +911125769111 (Multiple Lines)

<b>Disclosures under Regulation 29(2) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011</b>			
1. Name of the Target Company (TC)	GHCL Limited		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Gems Commercial Co. Ltd		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
5. Details of the acquisition / disposal/holding of shares/voting rights/holding of the Acquirer and PAC	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
a) Shares carrying voting rights	2862207 equity shares	2.86%	2.86%
b) Voting rights (VR) otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	Nil		
<b>Total (a+b+c)</b>	<b>2862207 equity shares</b>	<b>2.86%</b>	<b>2.86%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired	29000 equity shares	0.03%	0.03%
b) VRs acquired /sold otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) acquires / sold	Nil		
<b>Total (a+b+c)</b>	<b>29000 equity shares</b>	<b>0.03%</b>	<b>0.03%</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	2891207 equity shares	2.89%	2.89%
b) VRs otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) after acquisition	Nil		
<b>Total (a+b+c)</b>	<b>2891207 equity shares</b>	<b>2.89%</b>	<b>2.89%</b>
6. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Acquisition of equity shares in Open Market		
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	27/10/2014		
8. Equity share capital / total voting capital of the TC before the said acquisition / sale	2862207 equity shares		
9. Equity share capital/ total voting capital of the TC after the said acquisition / sale	2891207 equity shares		
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	2891207 equity shares		
(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities / warrants into equity shares of the TC.			
Signature of the acquirer			
			
For Gems Commercial Co. Ltd.			
Place: New Delhi			
Date:28/10/2014			

6/22

Message Confirmation Report

OCT-28-2014 05:00 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:59PM TUE  
Elapsed Time : 00' 40"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 04:59 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:58PM TUE  
Elapsed Time : 00' 38"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 04:58 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:57PM TUE  
Elapsed Time : 00' 36"  
Mode : STD G3  
Results : [O.K]

Message Confirmation Report

OCT-28-2014 05:04 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:03PM TUE  
Elapsed Time : 00'56"  
Mode : STD ECM  
Results : [O.K]

Message Confirmation Report

OCT-28-2014 05:03 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:02PM TUE  
Elapsed Time : 00'48"  
Mode : STD ECM  
Results : [O.K]

Message Confirmation Report

OCT-28-2014 05:01 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:00PM TUE  
Elapsed Time : 00'34"  
Mode : STD ECM  
Results : [O.K]

# MODERATE INVESTMENT & COMMERCIAL ENTERPRISES LTD.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: satishagarwal30762@gmail.com

Ph: +911125769111 (Multiple Lines)

October 28, 2014

**National Stock Exchange of India Limited**  
"Exchange Plaza"  
Bandra - Kurla Complex,  
Bandra (E), Mumbai - 400 051  
Fax # 022 26598237/38

**BSE Limited**  
DCS - CRD  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J.  
Towers,  
Dalal Street, Fort, Mumbai - 400 001  
(Fax: 022 22723121/2037/2041/3714/2039/2061)

Dear Sirs,

Re.: GHCL Limited (BSE Code: 500171)

Subject: Disclosure under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011

Pursuant to provisions of Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011, intimation be and is hereby given that we have purchased 35,000 equity shares of GHCL Limited from the open market.

Copy of disclosures required under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011 are enclosed herewith.

Thanking you

Yours faithfully

For Moderate Investment & Commercial Enterprises Ltd.

*Jagbir Singh*

Jagbir Singh  
Director

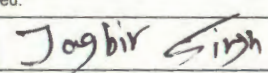
c.c  
to GHCL LIMITED  
B-38, Institutional Area, Sector - 1, Noida (India)



# MODERATE INVESTMENT & COMMERCIAL ENTERPRISES LTD.

9/22

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008  
 Email: satishagarwal30762@gmail.com  
 Ph: +911125769111 (Multiple Lines)

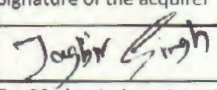
FORM D											
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992											
[Regulation 13(4A) and (6)]											
Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Promoter or Person who is part of Promoter Group of a listed company											
Name, PAN No. & Address of Promoter	No. & % of shares / voting rights held by the Promoter	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of intimation to company	Mode of acquisition (market purchase / public / rights / preferential offer, etc.) / Sale	No. & % of shares / voting rights post acquisition /sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
Moderate Investment & Commercial Enterprises Ltd (PAN:AAACM9104G). Address: 9/14 (2nd Floor,) East Patel Nagar, New Delhi-110008 .	570050 equity shares (i.e. 0.57%)	27/10/2014	28/10/2014	Market purchase	605050 equity shares (0.61%)	K K Securities Limited, Registration No. of the TM - (NSE: INB230770030) & (BSE: INB010770031)	NSE & BSE	35000 equity shares of GHCL Limited	Rs.29,97,269.82/-	Nil	Nil
35000 equity shares purchased on NSE and Nil Equity shares purchased on BSE											
Note: With the purchase of aforesaid number of shares, total holding of Promoter & Promoter Group stands increased.											
Place: New Delhi						Signature					
Date:28/10/2014						Name	For Moderate Investment & Commercial Enterprises Ltd.				
						Designation	Director				

# MODERATE INVESTMENT & COMMERCIAL ENTERPRISES LTD.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: satishagarwal30762@gmail.com

Ph: +911125769111 (Multiple Lines)

Disclosures under Regulation 29(2) of SEBI Substantial Acquisition of Shares and Takeovers) Regulations, 2011			
1. Name of the Target Company (TC)	GHCL Limited		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Moderate Investment & Commercial Enterprises Ltd.		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
5. Details of the acquisition / disposal/holding of shares/voting rights/holding of the Acquirer and PAC	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
a) Shares carrying voting rights	570050 equity shares	0.57%	0.57%
b) Voting rights (VR) otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	Nil		
<b>Total (a+b+c)</b>	<b>570050 equity shares</b>	<b>0.57%</b>	<b>0.57%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired	35000 equity shares	0.04%	0.04%
b) VRs acquired /sold otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) acquires / sold	Nil		
<b>Total (a+b+c)</b>	<b>35000 equity shares</b>	<b>0.04%</b>	<b>0.04%</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	605050 equity shares	0.61%	0.61%
b) VRs otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) after acquisition	Nil		
<b>Total (a+b+c)</b>	<b>605050 equity shares</b>	<b>0.61%</b>	<b>0.61%</b>
6. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Acquisition of equity shares in Open Market		
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	27/10/2014		
8. Equity share capital / total voting capital of the TC before the said acquisition / sale	570050 equity shares		
9. Equity share capital/ total voting capital of the TC after the said acquisition / sale	605050 equity shares		
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	605050 equity shares		
(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities / warrants into equity shares of the TC.			
Signature of the acquirer			
			
For Moderate Investment & Commercial Enterprises Ltd			
Place: New Delhi			
Date:28/10/2014			

11/22

Message Confirmation Report

OCT-28-2014 04:53 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:53PM TUE  
Elapsed Time : 00' 50"  
Mode : STD ECM  
Results : [O.K]

Message Confirmation Report

OCT-28-2014 04:52 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:51PM TUE  
Elapsed Time : 00' 42"  
Mode : STD ECM  
Results : [O.K]

Message Confirmation Report

OCT-28-2014 04:51 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:50PM TUE  
Elapsed Time : 00' 36"  
Mode : STD ECM  
Results : [O.K]

13/22  
12/22

Message Confirmation Report

OCT-28-2014 04:55 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:54PM TUE  
Elapsed Time : 00'36"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 04:56 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:55PM TUE  
Elapsed Time : 00'36"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 04:57 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:56PM TUE  
Elapsed Time : 00'40"  
Mode : STD G3  
Results : [O.K]

---

14/22  
13/22

# International Resources Ltd.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: satishagarwal30762@gmail.com

Ph: +911125769111 (Multiple Lines)

October 28, 2014

**National Stock Exchange of India Limited**  
"Exchange Plaza"  
Bandra - Kurla Complex,  
Bandra (E), Mumbai - 400 051  
Fax # 022 26598237/38

**BSE Limited**  
DCS - CRD  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J.  
Towers,  
Dalal Street, Fort, Mumbai - 400 001  
(Fax: 022 22723121/2037/2041/3714/2039/2061)

Dear Sirs,

Re.: GHCL Limited (BSE Code: 500171)

Subject: Disclosure under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011

Pursuant to provisions of Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011, intimation be and is hereby given that we have purchased 23,000 equity shares of GHCL Limited from the open market.

Copy of disclosures required under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011 are enclosed herewith.

Thanking you

Yours faithfully

For International Resources Ltd.

*Deepa*

Deepa Nanda  
Director

cc  
to GHCL LIMITED  
B-38, Institutional Area, Sector - 1, Noida (India)

FORM D											
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992											
[Regulation 13(4A) and (6)]											
Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Promoter or Person who is part of Promoter Group of a listed company											
Name, PAN No. & Address of Promoter	No. & % of shares / voting rights held by the Promoter	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of intimation to company	Mode of acquisition (market purchase / public / rights / preferential offer, etc.) / Sale	No. & % of shares / voting rights post acquisition /sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
International Resources Ltd (PAN:AABCI5633H), Address: 9/14 (2nd Floor,) East Patel Nagar, New Delhi-110008	552671 equity shares (i.e. 0.55%)	27/10/2014	28/10/2014	Market purchase	575671 equity shares (0.58%)	K K Securities Limited, Registration No. of the TM - (NSE: INB230770030) & (BSE: INB010770031)	NSE & BSE	23000 equity shares of GHCL Limited	Rs.19,69,634.22/-	Nil	Nil
23000 equity shares purchased on NSE and Nil Equity shares purchased on BSE											
Note: With the purchase of aforesaid number of shares, total holding of Promoter & Promoter Group stands increased.											
Place: New Delhi						Signature	Deeja				
Date: 28/10/2014						Name	For International Resources Ltd				
						Designation	Director				

**International Resources Ltd.**

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008  
 Email: satishagarwal30762@gmail.com  
 Ph: +911125769111 (Multiple lines)

15/10/22  
14/22

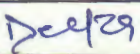
# 16/22 15/22

# International Resources Ltd.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: satishagarwal30762@gmail.com

Ph: +911125769111 (Multiple Lines)

<b>Disclosures under Regulation 29(2) of SEBI Substantial Acquisition of Shares and Takeovers) Regulations, 2011</b>			
1. Name of the Target Company (TC)	GHCL Limited		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	International Resources Ltd.		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
5. Details of the acquisition /disposal/holding of shares/voting rights/holding of the Acquirer and PAC	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
a) Shares carrying voting rights	552671 equity shares	0.55%	0.55%
b) Voting rights (VR) otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	Nil		
<b>Total (a+b+c)</b>	<b>552671 equity shares</b>	<b>0.55%</b>	<b>0.55%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired	23000 equity shares	0.03%	0.03%
b) VRs acquired /sold otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) acquires / sold	Nil		
<b>Total (a+b+c)</b>	<b>23000 equity shares</b>	<b>0.03%</b>	<b>0.03%</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	575671 equity shares	0.58%	0.58%
b) VRs otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) after acquisition	Nil		
<b>Total (a+b+c)</b>	<b>575671 equity shares</b>	<b>0.58%</b>	<b>0.58%</b>
6. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Acquisition of equity shares in Open Market		
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	27/10/2014		
8. Equity share capital / total voting capital of the TC before the said acquisition / sale	552671 equity shares		
9. Equity share capital/ total voting capital of the TC after the said acquisition / sale	575671 equity shares		
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	575671 equity shares		
(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities / warrants into equity shares of the TC.			
Signature of the acquirer			
			
For International Resources Ltd			
Place: New Delhi			
Date:28/10/2014			

17/22  
16/22

Message Confirmation Report

OCT-28-2014 05:08 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 05:07PM TUE  
Elapsed Time : 00'40"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 05:07 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 05:06PM TUE  
Elapsed Time : 00'36"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 05:06 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 05:05PM TUE  
Elapsed Time : 00'36"  
Mode : STD G3  
Results : [O.K]

---



18/22  
17/22

Message Confirmation Report

OCT-28-2014 05:11 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:10PM TUE  
Elapsed Time : 00'54"  
Mode : STD ECM  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 05:10 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:09PM TUE  
Elapsed Time : 00'42"  
Mode : STD ECM  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 05:09 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 05:08PM TUE  
Elapsed Time : 00'36"  
Mode : STD ECM  
Results : [O.K]

---

# HINDUSTAN COMMERCIAL COMPANY LTD.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: sathishagarwal30762@gmail.com Ph: +911125769111 (Multiple Lines)

October 28, 2014

National Stock Exchange of India  
Limited  
"Exchange Plaza"  
Bandra - Kurla Complex,  
Bandra (E), Mumbai - 400 051  
Fax # 022 26598237/38

BSE Limited  
DCS - CRD  
1<sup>st</sup> Floor, New Trading Ring, Rotunda Building, P.J.  
Towers,  
Dalal Street, Fort, Mumbai - 400 001  
(Fax: 022 22723121/2037/2041/3714/2039/2061)

Dear Sirs,

Re.: GHCL Limited (BSE Code: 500171)

Subject: Disclosure under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011

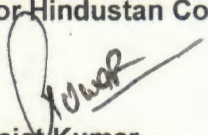
Pursuant to provisions of Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011, intimation be and is hereby given that we have purchased 23,000 equity shares of GHCL Limited from the open market.

Copy of disclosures required under Regulation 13 (4A) of SEBI (Prohibition of Insider Trading) Regulations, 1992 and Regulation 29 (2) of SEBI (SAST) Regulations, 2011 are enclosed herewith.

Thanking you

Yours faithfully

For Hindustan Commercial Co Ltd.

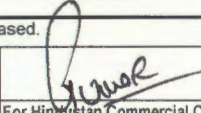
  
Rajat Kumar  
Director

cc  
to GHCL LIMITED  
B-38, Institutional Area, Sector - 1, Noida (India)

# HINDUSTAN COMMERCIAL COMPANY LTD.

19/22

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008  
 Email: satishagarwal30762@gmail.com Ph: +911125769111 (Multiple Lines)

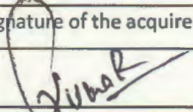
FORM D											
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992											
[Regulation 13(4A) and (6)]											
Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Promoter or Person who is part of Promoter Group of a listed company											
Name, PAN No. & Address of Promoter	No. & % of shares / voting rights held by the Promoter	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of intimation to company	Mode of acquisition (market purchase / public / rights / preferential offer, etc.) / Sale	No. & % of shares / voting rights post acquisition /sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
Hindustan Commercial Company Ltd (PAN: AAACH2851B), Address: 9/14 (2nd Floor,) East Patel Nagar, New Delhi-110008	746150 equity shares (i.e. 0.75%)	27/10/2014	28/10/2014	Market purchase	769150 equity shares (0.77%)	K K Securities Limited, Registration No. of the TM - (NSE: INB230770030) & (BSE: INB010770031)	NSE & BSE	23000 equity shares of GHCL Limited	Rs.19,69,634.22/-	Nil	Nil
23000 equity shares purchased on NSE and Nil Equity shares purchased on BSE											
Note: With the purchase of aforesaid number of shares, total holding of Promoter & Promoter Group stands increased.											
Place: New Delhi						Signature					
Date: 28/10/2014						Name	For Hindustan Commercial Company Ltd.				
						Designation	Director				

20/22

# HINDUSTAN COMMERCIAL COMPANY LTD.

Registered Office: 9/14, (First Floor) East Patel Nagar, New Delhi- 110008

Email: satishagarwal30762@gmail.com Ph: +911125769111 (Multiple Lines)

<b>Disclosures under Regulation 29(2) of SEBI Substantial Acquisition of Shares and Takeovers) Regulations, 2011</b>			
1. Name of the Target Company (TC)	GHCL Limited		
2. Name(s) of the acquirer and Persons Acting in Concert (PAC) with the acquirer	Hindustan Commercial Co. Ltd.		
3. Whether the acquirer belongs to Promoter/Promoter group	Yes		
4. Name(s) of the Stock Exchange(s) where the shares of TC are Listed	BSE Limited National Stock Exchange of India Limited		
5. Details of the acquisition / disposal/holding of shares/voting rights/holding of the Acquirer and PAC	Number	% w.r.t. total share/voting capital wherever applicable	% w.r.t. total diluted share/voting capital of the TC(*)
<b>Before the acquisition/disposal under consideration, holding of:</b>			
a) Shares carrying voting rights	746150 equity shares	0.75%	0.75%
b) Voting rights (VR) otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category)	Nil		
<b>Total (a+b+c)</b>	<b>746150 equity shares</b>	<b>0.75%</b>	<b>0.75%</b>
<b>Details of acquisition/sale</b>			
a) Shares carrying voting rights acquired	23000 equity shares	0.02%	0.02%
b) VRs acquired /sold otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) acquires / sold	Nil		
<b>Total (a+b+c)</b>	<b>23000 equity shares</b>	<b>0.02%</b>	<b>0.02%</b>
<b>After the acquisition/sale, holding of:</b>			
a) Shares carrying voting rights	769150 equity shares	0.77%	0.77%
b) VRs otherwise than by shares	Nil		
c) Warrants/convertible securities/any other instrument that entitles the acquirer to receive shares carrying voting rights in the T C (specify holding in each category) after acquisition	Nil		
<b>Total (a+b+c)</b>	<b>769150 equity shares</b>	<b>0.77%</b>	<b>0.77%</b>
6. Mode of acquisition / sale (e.g. open market / off-market / public issue / rights issue / preferential allotment / inter-se transfer etc).	Acquisition of equity shares in Open Market		
7. Date of acquisition / sale of shares / VR or date of receipt of intimation of allotment of shares, whichever is applicable	27/10/2014		
8. Equity share capital / total voting capital of the TC before the said acquisition / sale	746150 equity shares		
9. Equity share capital/ total voting capital of the TC after the said acquisition / sale	769150 equity shares		
10. Total diluted share/voting capital of the TC after the said acquisition/sale.	769150 equity shares		
(*) Diluted share / voting capital means the total number of shares in the TC assuming full conversion of the outstanding convertible securities / warrants into equity shares of the TC.			
Signature of the acquirer			
			
For Hindustan Commercial Co Ltd.			
Place: New Delhi			
Date:28/10/2014			

~~21/22~~  
21/22

Message Confirmation Report

OCT-28-2014 04:40 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:40PM TUE  
Elapsed Time : 00' 34"  
Mode : STD G3  
Results : [O.K]

---

Message Confirmation Report

OCT-28-2014 04:46 PM TUE

Fax Number :  
Name :

Name/Number : 02226598237  
Page : 1  
Start Time : OCT-28-2014 04:44PM TUE  
Elapsed Time : 00' 40"  
Mode : STD G3  
Results : [O.K]

---

## Message Confirmation Report

OCT-28-2014 04:47 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:47PM TUE  
Elapsed Time : 00' 36"  
Mode : STD ECM  
Results : [O.K]

---

## Message Confirmation Report

OCT-28-2014 04:49 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:48PM TUE  
Elapsed Time : 00' 44"  
Mode : STD ECM  
Results : [O.K]

---

## Message Confirmation Report

OCT-28-2014 04:50 PM TUE

Fax Number :  
Name :

Name/Number : 02222723121  
Page : 1  
Start Time : OCT-28-2014 04:49PM TUE  
Elapsed Time : 00' 50"  
Mode : STD ECM  
Results : [O.K]

---

SENDING REPORT

29 Oct. 2014 5:27PM

YOUR LOGO : GHCL  
YOUR FAX NO. : 01202535209

NO.	OTHER FACSIMILE	START TIME	USAGE TIME	MODE	PAGES	RESULT	
01	6102222723121	29 Oct. 5:13PM	13'41	SND	22	OK	BSE

TO TURN OFF REPORT, PRESS 'MENU' #04.  
THEN SELECT OFF BY USING '+' OR '-'.

SENDING REPORT

29 Oct. 2014 5:41PM

YOUR LOGO : GHCL  
YOUR FAX NO. : 01202535209

NO.	OTHER FACSIMILE	START TIME	USAGE TIME	MODE	PAGES	RESULT	
01	Fax Server 022.26598238	29 Oct. 5:28PM	12'34	SND	22	OK	NSE

TO TURN OFF REPORT, PRESS 'MENU' #04.  
THEN SELECT OFF BY USING '+' OR '-'.