

Dear Shareholders,

Ministry of Corporate affairs (MCA) had recently amended the provisions relating to the Significant Beneficial ownership for which some time bound disclosures were mandated by the MCA.

We request all the shareholders to kindly adhere to the guidelines and intimate the following disclosures as may be applicable in case of your shareholding with the Company NCL Buildtek Limited.

### **(1) Disclosure of Beneficial interest:**

#### **➤ By Registered Shareholder**

- Any shareholder whose name is entered in the Register of members as a shareholder but does not hold the beneficial interest in the shares should make a declaration in **Form MGT-4** with in **30days** from the date of entry in the register of members by the Company.

#### **➤ By individual who owns Beneficial interest**

- Further in connection with Every Person Claiming Beneficial interest in the shares of a company, then make a declaration to the Company, specifying, the nature of interest, along with Particulars of interest in **FormMGT-5** within **30 Days** of acquiring such beneficial interest or rights or any changes thereof.

### **Consequences of non-disclosure-**

Non-Disclosure, of beneficial ownership, will not confer any rights or benefits, to the person claiming to be the beneficial owner of the shares.

### **Penalty-**

If any person who is required to give Declaration, but fails to make a declaration, is liable to a fine of Rupees. **50,000/-** and incase, of continuing failure, **Rs.200 Per day**, and subject to a maximum of Rs. **5 Lakhs**

Furnishing of information, by suppressing the facts, leads to prosecution under **Section 447** of the Companies Act, 2013

<b>Form No</b>	<b>Forms Name</b>
<b>MGT-4</b>	<b>Declaration to be made by the registered owner of the shares</b>
<b>MGT-5</b>	<b>Declaration to be made by the beneficial owner of the shares</b>



## (2) Significant Beneficial Owner-

- Every Individual who holds indirectly or together with Direct holding not less than 10% of shares/voting rights/right to receive distributable dividends or other distribution/right to exercise significant influence or control.
- Here Individual includes body corporate (registered/incorporated in India or abroad), Limited Liability Partnership, Trust, Hindu Undivided Family or Pooled investment vehicle and so on.
- Such Individual shall make a declaration to the company in FORM **BEN-1**, within **30 Days** of acquiring such beneficial interest, or rights, or any changes thereof.

### Consequences of non-compliances-

- Failure to give declaration in **BEN-1**, Penalty **Rs.50,000/-**
- Continuing failure, **Rs1,000/- per day** subject to a **maximum of Rs.2 Lakhs.**
- Individuals willfully furnishes any false or incorrect information or suppresses any material information of which he/she is aware in declaration made under this section, then liable for action Under **section 447** of the Act.

Form No	Form Name
BEN-1	Declaration to be made by Beneficial owner, who is a SBO

Therefore, all the shareholder to whom the said regulations are applicable are requested to adhere to the same from time to time.

Shareholders can access all the required forms as specified above under ***Investors Tab*** on the Company's website at: [www.nclbuildtek.com](http://www.nclbuildtek.com).

Should you have any query or require any assistance in the matter, please write to The Company Secretary, at e-mail ID: [companysecretary@nclbuildtek.com](mailto:companysecretary@nclbuildtek.com) or you may call at: **040-683133/3346.**

