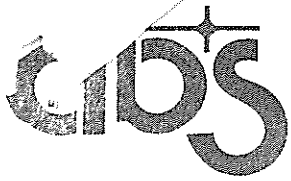


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**ABS CONSULTANT PVT. LTD.**  
SEBI AUTHORISED CATEGORY -1 REGISTRARS & SHARE  
TRANSFER AGENT WITH NSDL & CDSL CONNECTIVITY

October 3, 2018

To  
SPBP TEA (INDIA) LTD.  
"CRESENT TOWER", 4TH FLOOR,  
229, A. J. C. BOSE ROAD  
KOLKATA - 700017

Isin No. INE850F01019

Dear Sir,

Re.: Reconciliation of Capital

We hereby confirm that as per Physical Master of your company the total Number of Shares held under NSDL Folio, CDSL Folio and the Physical Shareholders as on September 30, 2018 are as under:

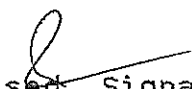
	No. of Shares
NSDL FOLIO	8,48,795
CDSL FOLIO	Nil
PHYSICAL HOLDER	88,405
Total	9,37,200

Note :

- 1). Report relating to dematerialisation request(s) processed after 21 days and pending for more than 21 days from the date of receipt by us - ~~Enclosed~~ / Nil
- 2). Print Copy of Distribution of Holding as on September 30, 2018 - ~~Enclosed~~ / ~~Not Enclosed~~.
- 3). Investor's Complaints (other than relating to payment of Dividend)
  - i) Pending at the beginning of the Quarter \_\_\_\_\_
  - ii) Received during the Quarter \_\_\_\_\_
  - iii) Resolved during the Quarter \_\_\_\_\_
  - iv) Outstanding at the end of the Quarter \_\_\_\_\_

Thanking you

Yours faithfully,  
For ABS CONSULTANT PVT.LTD.

  
Authorised Signatory

1. Name of the Listed Entity : SPBP TEL INDIA) LTD.

2. Scrip Code : \_\_\_\_\_ /Name of Scrip \_\_\_\_\_ /Class of Security : Equity Shares  
3. Share Holding Pattern Field under: Reg.31(1)(b)/Reg.31(1)(c)  
a. If under 31(1)(b) then indicate the report for Quarter ending 30.09.2018

As On Date : 30.09.2018

Page No. 1

4. Declaration: The listed entity is required to submit the following declaration to the extent of submission of information:-

Particulars	Yes*	No*
1. Whether the Listed Entity has issued any partly paid up shares ?		NO
2. Whether the Listed Entity has issued any Convertible Securities or Warrants ?		NO
3. Whether the Listed Entity has any shares against which depository receipts are issued ?		NO
4. Whether the Listed Entity has any shares in locked-in ?		NO
5. Whether any shares held by promoters are pledge or otherwise encumbered ?		NO

5. The tabular format for disclosure of holding of specified securities is as follows :-

Table I - Summary Statement holding of specified securities

Category of Shareholder (I)	No. of Holder (II)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underlying Depository Receipt (VI)	Total Nos. shares held (VII)=(IV)+(V)+(VI)	Shareholding as a % of Total Nos. shares (calculated as per SCRR, 1957 as a % of (A+B+C2)) (VIII)	Member of Voting Rights each class of securities (----No. of Voting Rights Class EQ. Class X Total (A+B+C)) (IX)	Total as a % of (A+B+C2) (X)	No. of shares underlying Convertible Securities (including Warrants)	Shareholding as a % assuming full conversion of convertible securities as a % of (A+B+C2) (XI)	No. of Lock-in Shares (a) (XII)	Number of Shares Pledged or otherwise encumbered (b) (XIII)	Mo. of Eq. Shares held in Demat Form (XIV)
(A) Promoter & Promoters Group	4	686595	--	--	686595	73.26	686595	73.26	--	73.26	--	--	686595
(B) Public	4	250605	--	--	250605	26.74	250605	26.74	--	26.74	--	NA	162200
(C) Non Promoter-Non Public	--	--	--	--	--	--	--	--	--	--	--	NA	NA
(C1) Shares underlying DRs	--	--	--	--	--	--	--	--	--	--	--	NA	NA
(C2) Shares held by Employee Trust	--	--	--	--	--	--	--	--	--	--	--	NA	NA
Total :-	8	937200	0	0	937200	100.00	937200	100.00	0	100.00	0	0	848795

Actual holder -> 8

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underlying Depository Receipt (VI)	Total Nos. shares held (VII) = (IV) + (V) + (VI)	Shareholding as a % of Total no. of Shares (excluding SPDR, 1957 As a % of (A+B+C2)) (VIII)	Number of Voting Rights held in each class of securities (-----No. of Voting Rights Class E, Class x Total (A+B+C)) (IX)	No. of shares underlying Convertible Securities (including Warrants) as a % of A+B+C2 (X)	Shareholding as a % assuming full conversion of convertible securities as a percentage of diluted shares capital (XI) = (X)/(X+Y)	No. of Lock-in Shares (-----) (-----)		Number of Shares Pledged or otherwise encumbered (-----) (-----)		
											(a)	(b)	(a)	(b)	
<b>(1) INDIAN :</b>															
<b>(a) Individuals / HUF</b>															
1 HANISH KUMAR	AFWPK2451B	1	2145	0	0	2145	0.23	2145	0	0.23	0	0.00	0	0.00	2145
2 PRANJOY RAHJ	AFWPK4317H	1	163388	0	0	163388	17.43	163388	0	17.43	0	0.00	0	0.00	163388
3 DEVIANE KUMAR	DBPPX2006A	1	217435	0	0	217435	23.20	217435	0	23.20	0	0.00	0	0.00	217435
		3	382968	0	0	382968	40.86	382968	0	40.86	0	0.00	0	0.00	382968
<b>(b) Central Govt./State Govt.(s)</b>															
<b>(c) Financial Institutions / Banks</b>															
<b>(d) Any Other (specify Bodies Corporate)</b>															
1 ABYRNAT TRADING PVT LTD	ABBE272A1H	1	303627	0	0	303627	32.40	303627	0	32.40	0	0.00	0	0.00	303627
		1	303627	0	0	303627	32.40	303627	0	32.40	0	0.00	0	0.00	303627
		0	0	0	0	0	0.00	0	0	0.00	0	0.00	0	0.00	0
		0	0	0	0	0	0.00	0	0	0.00	0	0.00	0	0.00	0
		0	0	0	0	0	0.00	0	0	0.00	0	0.00	0	0.00	0
		4	686595	0	0	686595	73.26	686595	0	73.26	0	0.00	0	0.00	686595
Sub Total (A)(1) :															
<b>(2) FOREIGN :</b>															
<b>(a) NRI / Foreign Individuals</b>															
<b>(b) Foreign Govt.-Promoter</b>															

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underlying Depository Receipt (VI)	Total nos. shares held (VII)=(IV)+(V)+(VI)	Total no. of Shares (calculated as per SCRR, 1957 as amended) (VIII)	Number of Voting Rights each class of securities (-----No. of Voting Rights Class Eq. Class X -----) (IV)	Total as a % of (A+B+C) (X)	No. of shares underlying Convertible Securities (including Warrants) (XI)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted shares capital) as a % of (A+B+C) (XI)		No. of Lock-in Shares (a) (XII)	As a % of total shares held (b) (XIII)	Number of Shares Pledged or otherwise encumbered (-----) (XIV)	As a % of total shares held (a) (b) (XV)	No. of Eq. Shares held in Demat Form (XVI)	
											(a)	(b)						
(c) Foreign Inst. Invest. (FIIs)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0	
(d) Foreign Portfolio Investor		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0	
(e) Any other (Specify) Foreign Company		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0	
Overseas Corporate Bodies		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0	
Foreign Bank		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0	
Sub Total (A)(2) :																		
Total Shareholding of Promoter and Promoter Group.		(A) = (A)(1) + (A)(2) :	4	686595	0	0	686595	73.26	686595	73.26	0	686595	73.26	0	0.00	0	0.00	686595

Table III - Statement showing shareholding pattern of public shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Party Paidup Shares held (V)	No. of Shares Depository Receipt (VI)	Total Nos. Shares held (VII) = (IV) + (V) + (VI)	Shareholding as a % of Total no. of Shares (calculated as per SCRR, 1957 As a % of (A+B+C)) (VIII)	Number of Voting Rights held in each class of securities (-----No. of Voting Rights-----) Class Eq. Class x Total (A+B+C) (IX)	No. of shares underlying Outstanding Convertible Securities (including Warrants) (X)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted shares capital) (XI) = (X)/(X+Y)	No. of Lock-in Shares otherwise encumbered (XII)		Number of Shares Pledged or otherwise encumbered (XIII)		No. of Eq. Shares held in Demat Form (XIV)
											(a)	(b)	(a)	(b)	
<b>(1) Institutions :</b>															
(a) Mutual Funds / UTI		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(b) Venture Capital Funds		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(c) Alternate Investment Fund		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(d) Foreign Venture Capital Investor		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(e) Foreign Portfolio Investor		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(f) Financial Institutions/Banks		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(g) Insurance Companies		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(h) Provident Funds/Pension Funds		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
(i) Any Other (specify Foreign Inst. Invest. (FIIs))		0	0	0	0	0	0.00	0	0	0.00	0	0.00	NA	NA	0
Sub total (g)(i) :															
0 0 0 0 0 0 0.00 0 0 0.00 0 0.00 0 0.00 0 0															
<b>(2) Central Govt./State Govt./President of India</b>															
0 0 0 0 0 0 0.00 0 0 0.00 0 0.00 0 0.00 0 0															
Sub total (g)(2) :															
0 0 0 0 0 0 0.00 0 0 0.00 0 0.00 0 0.00 0 0															
<b>(3) Non-institutions :</b>															
<b>(a) Individuals -</b>															
i) Indv. shareholders holding nominal share capital upto Rs. 2 lakh.															
0 0 0 0 0 0 0.00 0 0 0.00 0 0.00 0 0.00 0 0															
ii) Indv. shareholders holding nominal share capital in excess of Rs. 2 lakh.															
0 0 0 0 0 0 0.00 0 0 0.00 0 0.00 0 0.00 0 0															

Table III - Statement showing shareholding pattern of Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underlying Depository Receipt (VI)	Total Nos. shares held (VII) = (IV) + (V) + (VI)	Shareholding as a % of Total no. of shares (calculated as per SCRR, 1957 as amended) (VIII) = (VII) / (IX) x 100	Number of Voting Rights held in each class of securities (X)	Total as a % of Total (A+B+C) (XI)	No. of shares underlying Convertible Securities (including Warrants) (XII)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted shares capital) (XIII) = (VII) + (XII) as a % of A+B+C2	No. of Lock-in Shares (XIV)		Number of Shares Pledged or otherwise encumbered (XV)		No. of Eq. Shares held in Demat Form (XVI)	
												(a)	(b)	(a)	(b)		
(b) NBFCs registered with RBI		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
(c) Employee Trusts		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
(d) Overseas Depositories (holding DRs) (balancing figure)		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
(e) Any Other (specify) : Bodies Corporate																	
i) Holding 1% and above :																	
1 PARTNOSH VINIKAY (P) LTD.	AFCP366C	1	28505	0	0	28505	3.04	28505	0	28505	3.04	0	0.00	NA	NA	0	
2 THE ASOKA TRADING CO PVT LTD	AABC188560	1	50145	0	0	50145	5.35	50145	0	50145	5.35	0	0.00	NA	NA	50145	
3 CHEFFAIR ENRG. INDIA (P) LTD.	AABC00277F	1	59900	0	0	59900	6.39	59900	0	59900	6.39	0	0.00	NA	NA	0	
4 AQUATECH PROJECTS PVT. LTD.	AFQCA1387A	1	112055	0	0	112055	11.36	112055	0	112055	11.36	0	0.00	NA	NA	112055	
		4	250605	0	0	250605	26.74	250605	0	250605	26.74	0	0.00	NA	NA	162200	
ii) Holding less than 1% :																	
Non Resident Indian		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Foreign National		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Overseas Corporate Bodies		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Foreign Bank		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Trust		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Foreign Company		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
Others		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	NA	NA	0	
<b>Sub Total (B)(3) :</b>		4	250605	0	0	250605	26.74	250605	0	250605	26.74	0	0.00	NA	NA	162200	

Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underlying Depository Receipt (VI)	Total Nos. shares held (VII) = (IV) + (V) + (VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957 as amended) (VIII)	Number of Voting Rights held in each class of securities (IX)	Total as a % of Total (A+B+C) (X)	No. of shares underlying Outstanding Convertible Securities (including Warrants) (XI)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted shares capital) (XI) = (VII) + (X) as a % of (A+B+C) (XII)	No. of Lock-in Shares (XIII)		Number of Shares Pledged or otherwise encumbered (XIV)		No. of Eq. Shares held in Demat Form (XV)
												(a)	(b)	(a)	(b)	
Total Public shareholding :																
(B) = (B)(1)+(B)(2)+(B)(3)																
IEPF Authority		0	0	0	0	0	0.00	0	0.00	0	0.00	0	0.00	0	0	0
TOTAL ->		8	937200	0	0	937200	100.00	937200	100.00	0	100.00	0	0.00	0	0	848795



Table IV - Statement showing shareholding pattern of the Non Promoter - Non Public Shareholder

Category & Name of the Shareholders (I)	PAN (II)	No. of Holder (III)	No. of Fully Paidup Shares held (IV)	No. of Partly Paidup Shares held (V)	No. of Shares underling Depository Receipt (VI)	Total Nos. shares held (VII)=(IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957 As a % of (A+B+C2)) (VIII)	Number of Voting Rights held in each class of securities (IX)		Total as a % of Total (A+B+C) (X)	No. of shares underlying Convertible Securities (including Warrants) as a % of A+B+C2 (XI)	Shareholding as a % assuming full conversion of convertible securities (as a percentage of diluted shares capital) (XII)=(VII)+(X) as a % of A+B+C2 (XIII)	No. of lock-in Shares (a) (b) (XIV)	As a % of total shares held (a) (b) (XV)	Number of Shares Pledged or otherwise encumbered (XVI)	No. of Eq. Shares held in Debit Form (XVII)
								Class EQ. Class x	Class y							
(1) Custodian/DR Holder :																
(a) Name of DR Holder (if available)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	NA	NA	0
(2) Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	NA	NA	0
Name		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	NA	NA	0
Total Non-Promoter-Non Public Shareholding		0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	NA	NA	0
(C) = (b)(1) + (c)(2)																