

ASIA PACK LIMITED

o/c

Regd. Office : 3rd Floor, MIRAJ HOUSE, Panchawati, Udaipur-313 001 Tel.: +91 294 2528435, 36, 37, Fax : +91 294 2528436

Code No. 630

Date: 12th Jan 2011

To,

Stock Exchange Limited, Jaipur
Stock Exchange Building
JLN Marg
Malviya Nagar
Jaipur – 302017

Sub: Submission of Shareholding pattern as per Clause 35 of the Listing Agreement for the quarter ended 31st Dec 2010.

Dear Sir,

As per the requirements of Listing Agreement, we furnish herewith a copy of the Shareholding pattern under clause 35 of the Listing Agreement for the quarter ended 31st Dec 2010.

Kindly take it on your records & acknowledge the receipt.


Thanking you,

Yours faithfully,
For **Asia Pack Limited**



Authorized Signatory

Encl.: as above



ASIA PACK LIMITED

9/2

Regd. Office : 3rd Floor, MIRAJ HOUSE, Panchawati, Udaipur-313 001 Tel.: +91 294 2528435, 36, 37, Fax : +91 294 2528436

Code No. 530899

Date: 12th Jan 2011

To,

Corporate Relationship Department
Bombay Stock Exchange Limited
Pheroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001

Sub: Submission of Shareholding pattern as per Clause 35 of the Listing Agreement for the quarter ended 31st Dec 2010.

Dear Sir,

As per the requirements of Listing Agreement, we furnish herewith a copy of the Shareholding pattern under clause 35 of the Listing Agreement for the quarter ended 31st Dec 2010.

Kindly take it on your records & acknowledge the receipt.


Thanking you,

Yours faithfully,
For **Asia Pack Limited**



Authorized Signatory

Encl.: as above



| CATEGORY OF SHARES HOLDER | No Of Shares Holders | Total Share | Demat Shares | Total Shareholding as a percentage of total number of shares | | Shares Pledged or otherwise encumbered | |
|--|----------------------|----------------|--------------|--|--------------|--|--------|
| | | | | TOTAL (A+B) | % OF (A+B+C) | No Of Shares | As a % |
| ----- | | | | | | | |
| (A). SHARE HOLDING OF PROMOTER AND PROMOTER GROUP. | | | | | | | |
| 1. INDIAN | | | | | | | |
| (A) INDIVIDUALS/HINDU UNDIVIDEDE FAMILY. | 2 | 1430780 | | 54.25 | 54.25 | 0 | |
| (B) CENTRAL GOVT./STATE GOVT. | | | | | | | |
| (C) BODIES CORPORATE | | | | | | 0 | |
| (D) FINANCIAL INSTITUTION/BANKS | | | | | | | |
| (E) ANY OTHER (SPECIFY) | | | | | | | |
| ----- | | | | | | | |
| SUB-TOTAL (A) (1) | 2 | 1430780 | | 54.25 | 54.25 | 0 | |
| ----- | | | | | | | |
| 2. FOREIGN | | | | | | | |
| (A) INDIVIDUALS (NON-RESIDENT)/ FOREIGN INDIVIDUALS. | | | | | | | |
| (B) BODIES CORPORATE | | | | | | | |
| (C) INSTITUTIONS | | | | | | | |
| (D) ANY OTHER (SPECIFY) | | | | | | | |
| ----- | | | | | | | |
| SUB-TOTAL (A) (2) | | | | | | | |
| ----- | | | | | | | |
| (B). PUBLIC SHARE HOLDING | | | | | | | |
| 1. INSTITUTIONS | | | | | | | |
| (A) MUTUAL FUNDS/UTI. | | | | | | | |
| (B) FINANCIAL INSTITUTION/BANKS | 4 | 45100 | | 1.71 | 1.71 | | |
| (C) CENTRAL GOVT./STATE GOVT.(S) | | | | | | | |
| (D) VENTURE CAPITAL FUNDS | | | | | | | |
| (E) INSURANCE COMPANIES | | | | | | | |
| (F) FOREIGN INSTITUTIONAL INVESTORS | | | | | | | |
| (G) FOREIGN VETNURE CAPITAL INVESTORS | | | | | | | |
| (H) ANY OTHER (SPECIFY) | | | | | | | |
| ----- | | | | | | | |
| SUB-TOTAL (B) (1) | 4 | 45100 | | 1.71 | 1.71 | | |
| ----- | | | | | | | |
| 2. NON-INSTITUTIONS | | | | | | | |
| (A) BODIES CORPORATE | 15 | 371800 | | 14.10 | 14.10 | | |
| (B) INDIVIDUALS - | | | | | | | |
| i. INDIVIDUALS SHARE HOLDERS HOLDING NOMINAL SHARE CAPITAL UPTO RS.1 LAKH. | 836 | 275540 | | 10.45 | 10.45 | | |
| ii. INDIVIDUALS SHARE HOLDERS HOLDING NOMINAL SHARE CAPITAL IN EXCESS RS.1 LAKH. | 10 | 299100 | | 11.34 | 11.34 | | |
| (C) ANY OTHER (NRI & OCB) | 51 | 215100 | | 8.16 | 8.16 | | |
| (D) ANY OTHER (CLEARING MEMBER) | | | | | | | |

ASIA PACK LIMITED

STATEMENT SHOWING SHAREHOLDING PATTERN AS ON 31/12/2010

| CATEGORY OF SHARES HOLDER | No Of Shares Holders | Total Share | Demat Shares | Total Shareholding as a percentage of total number of shares | | Shares Pledged or otherwise encumbered | |
|---|----------------------|-------------|--------------|--|--------------|--|--------|
| | | | | TOTAL (A+B) | % OF (A+B+C) | No Of Shares | As a % |
| SUB-TOTAL (B) (2) | 912 | 1161540 | | 44.04 | 44.04 | | |
| (C). SHARE HELD BY CUSTODIANS AGAINST WHICH DEPOSITORY RECEIPTS HAVE BEEN ISSUED: | | | | | | | |
| GRAND TOTAL (A+B+C) : | 918 | 2637420 | | | 100 | 0 | 0.00 |

| FNO | NAME | SHARES | PERCENT |
|-----------------|---|----------------|--------------|
| 2482 | SHRI KALYAN HOLDINGS LTD., | 141200 | 5.35 |
| 2559 | SHANKAR DAS | 100000 | 3.79 |
| 2565 | SHREYANS BHANDARI | 67700 | 2.57 |
| 2485 | SHIKHA SHARES AND SECURITIES PVT. LTD., | 66900 | 2.54 |
| 900013 | CONCEPT GLOBAL TRUSTCAP LTD. | 50000 | 1.90 |
| 2480 | BANK OF INDIA | 30000 | 1.14 |
| TOTAL CASES : 6 | | TOTAL SHARES : | 455800 17.28 |

| FNO | NAME | Total Shares Held | | Shares Pledged or otherwise encumbered | | |
|---------------|----------------------------------|-------------------|----------------|--|--------|-----------------------|
| | | SHARES | PERCENT | Number | As a % | As a % of Grand Total |
| 2568 | MADAN PALIWAL (MIRAJ) FAMILY FOU | 1276340 | 48.39 | 0 | | |
| 2557 | SUSHILA DEVI PALIWAL | 154440 | 5.86 | 0 | | |
| TOTAL CASES : | | 2 | TOTAL SHARES : | 1430780 | 54.25 | 0.00 |

| TYPE OF OUTSTANDING DR | NO.OF OUTSTANDING DR | NO.OF SHARES UNDELYING OUTSTANDING DR'S | PERCENT |
|---------------------------|-------------------------|--|---------|
| ---N.A.--- | | | |

| NAME OF DR HOLDER | TYPE OF OUTSTANDING DR | NO.OF SHARES UNDELYING OUTSTANDING DR'S | PERCENT |
|----------------------|---------------------------|--|---------|
| ---N.A.--- | | | |

| FNO | NAME | LOCKED SHARES | PERCENT |
|-----------------|------------|----------------|---------|
| | ---N.A.--- | 0 | 0 |
| TOTAL CASES : 0 | | TOTAL SHARES : | 0 0.00 |