

DISTRIBUTION OF SHAREHOLDING AS PER CLAUSE 35 OF THE LISTING AGREEMENT

(1) (a)

STATEMENT SHOWING SHAREHOLDING PATTERN

| NAME OF THE COMPANY : | | THIRUMALAI CHEMICALS LIMITED | | | | | | |
|-----------------------|---|------------------------------|--------------------|--|--|-------------------|--|--------|
| SCRIP CODE: | | 500412 | | QUARTER ENDED 30/09/2011 | | | | |
| CATEGORY CODE | CATEGORY OF SHARE HOLDER | NO OF SHARE HOLDERS | TOTAL NO OF SHARES | NO OF SHARES HELD IN DEMATERIALISED FORM | TOTAL SHAREHOLDING AS A PERCENTAGE OF TOTAL NUMBER OF SHARES | | SHARES PLEDGED OR OTHERWISE ENCUMBERED | |
| | | | | | AS A % OF (A+B) | AS A % OF (A+B+C) | NO. OF SHARES | AS A % |
| (A) | Shareholding of Promoter and Promoter Group | | | | | | | |
| (1) | Indian | | | | | | | |
| (a) | Individuals / Hindu Undivided Family | 45 | 2431405 | 2426920 | 23.75 | 23.75 | | |
| (b) | Central Government / State Government(s) | | | | | | | |
| (c) | Bodies Corporate | 3 | 2700182 | 2698832 | 26.37 | 26.37 | | |
| (d) | Financial Institutions / Banks | | | | | | | |
| (e) | Any Other (specify) | | | | | | | |
| | Sub-Total(A)(1) | 48 | 5131587 | 5125752 | 50.12 | 50.12 | 0 | 0 |
| (2) | Foreign | | | | | | | |
| (a) | Individuals (Non-Resident Individuals / Foreign Individual(s)) | | | | | | | |
| (b) | Bodies Corporate | | | | | | | |
| (c) | Institutions | | | | | | | |
| (d) | Any Other (specify) | | | | | | | |
| | Sub-Total(A)(2) | 0 | 0 | 0 | 0.00 | 0.00 | 0 | 0 |
| | Total Shareholding of Promoter and Promoter Group (A)= (A)(1) + (A)(2) | 48 | 5131587 | 5125752 | 50.12 | 50.12 | 0 | 0 |
| (B) | Public | | | | | | | |
| | Shareholding | | | | | | | |
| (1) | Institutions | | | | | | | |
| (a) | Mutual Funds / UTI | | | | | | | |
| (b) | Financial Institutions / Banks | 12 | 1575 | 326 | 0.01 | 0.01 | | |
| (c) | Central Government / State Government(s) | | | | | | | |
| (d) | Venture Capital Funds | | | | | | | |
| (e) | Insurance Companies | 4 | 3600 | 3000 | 0.04 | 0.04 | | |
| (f) | Foreign Institutional Investors | | | | | | | |
| (g) | Foreign Venture Capital Investors | | | | | | | |
| (h) | Any Other | | | | | | | |
| | Sub-Total (B)(1) | 16 | 5175 | 3326 | 0.05 | 0.05 | | |
| (2) | Non-Institutions | | | | | | | |
| (a) | Bodies Corporate | 322 | 525009 | 517698 | 5.13 | 5.13 | | |
| (b) | Individuals- | | | | | | | |
| | (i) Individual shareholders holding nominal share capital upto Rs.1 lakh | 15475 | 3226110 | 2835881 | 31.51 | 31.51 | | |
| | (ii) Individual shareholders holding nominal share capital in excess of Rs.1 lakh | 33 | 1219583 | 1219583 | 11.91 | 11.91 | | |
| (c) | Any Other | | | | | | | |
| i | Clearing Member | 50 | 44684 | 44684 | 0.44 | 0.44 | | |
| ii | Market Maker | | | | | | | |
| iii | Foreign Nationals | | | | | | | |
| iv | NRI (Repat) | 96 | 60637 | 60052 | 0.59 | 0.59 | | |
| v | NRI (Non Repat) | 36 | 24127 | 24127 | 0.24 | 0.24 | | |
| vi | Foreign Companies | | | | | | | |
| vii | OCB | | | | | | | |
| viii | Trusts | 4 | 1900 | 1900 | 0.02 | 0.02 | | |
| | Sub-Total (B)(2) | 16016 | 5102050 | 4703925 | 49.83 | 49.83 | | |
| | Total Public shareholding (B) = (B)(1) + (B)(2) | 16032 | 5107225 | 4707251 | 49.88 | 49.88 | | |
| | TOTAL (A) + (B) | 16080 | 10238812 | 9833003 | 100.00 | 100.00 | | |
| (C) | Shares held by Custodians and against which Depository Receipts have been issued | 0 | 0 | 0 | 0.00 | 0.00 | | |
| | GRAND TOTAL (A) + (B) + (C) | 16080 | 10238812 | 9833003 | 100.00 | 100.00 | | |

(1)(b) **THIRUMALAI CHEMICALS LIMITED**
STATEMENT SHOWING SHAREHOLDING OF PERSONS BELONGING TO THE
CATEGORY "PROMOTER AND PROMOTER GROUP".

| SR. NO. | Name of the shareholder | Total shares held | | Shares pledged or otherwise encumbered | | |
|-----------------|-------------------------|-------------------|---------------------------------------|--|-----------------|--|
| | | Number of shares | As a % of grand total (A) + (B) + (C) | Number | As a percentage | As a % of grand total (A) + (B) + (C) of sub-clause (1)(a) |
| AS PER ANNEXURE | | | | | | |

(1)(c) **THIRUMALAI CHEMICALS LIMITED**
STATEMENT SHOWING SHAREHOLDING OF PERSONS BELONGING TO THE
CATEGORY "PUBLIC" AND HOLDING MORE THAN 1% OF THE TOTAL
NUMBER OF SHARES.

| SR. NO. | NAME OF THE SHAREHOLDER | NUMBER OF SHARES | SHARES AS A PERCENTAGE OF TOTAL NUMBER OF SHARES (i.e.GRAND TOTAL (A)+(B)+(C) INDICATED IN STATEMENT AT PARA (1) (a) ABOVE) |
|---------|-------------------------|------------------|---|
| 1 | ANIL KUMAR GOEL | 242587 | 2.37 |
| 2 | SEEMA GOEL | 150000 | 1.47 |
| 3 | T.KAMALA | 105603 | 1.03 |
| TOTAL | | 498190 | 4.87 |

(1)(d) **THIRUMALAI CHEMICALS LIMITED**
STATEMENT SHOWING DETAILS OF LOCKED -IN SHARES

| SR. NO. | NAME OF THE SHAREHOLDER | CATEGORY OF SHARE HOLDERS (PROMOTERS /PUBLIC) | NUMBER OF LOCKED -IN SHARES | LOCKED-IN SHARES AS A PERCENTAGE OF TOTAL NUMBER OF SHARES (i.e.GRAND TOTAL (A)+(B)+(C) INDICATED IN STATEMENT AT PARA (1) (a) ABOVE) |
|----------------|-------------------------|---|-----------------------------|---|
| NOT APPLICABLE | | | | |

(II) (a) **Statement showing details of Depository Receipts (DRs).**

| Sr. No. | Type of outstanding DR (ADRs, GDRs, SDRs, etc.) | Number of outstanding DRs | Number of shares underlying outstanding DRs | Shares underlying outstanding DRs as a percentage of total number of shares (i.e., Grand Total (A) + (B) + (C) indicated in Statement at para (I) (a) above) |
|---------|---|---------------------------|---|--|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | NOT APPLICABLE | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| TOTAL | | | | |

(II) (b) **Statement showing Holding of Depository Receipts (DRs), where underlying shares are in excess of 1% of the total number of shares.**

| Sr. No. | Name of the DR Holder | Type of outstanding DR (ADRs, GDRs, SDRs, etc.) | Number of shares underlying outstanding DRs | Shares underlying outstanding DRs as a percentage of total number of shares (i.e., Grand Total (A) + (B) + (C) indicated in Statement at para (I) (a) above) |
|---------|-----------------------|---|---|--|
| 1 | | | | |
| 2 | | | | |
| 3 | | | | |
| 4 | NOT APPLICABLE | | | |
| 5 | | | | |
| 6 | | | | |
| 7 | | | | |
| 8 | | | | |
| 9 | | | | |
| TOTAL | | | | |

(I)(b) Statement showing Shareholding of persons belonging to the category "Promoter and Promoter Group"

| Sr. No. | Name of the shareholder | Total shares held | | Shares pledged or otherwise encumbered | | |
|---------|----------------------------|-------------------|---------------------------------------|--|----------|---|
| | | Number of shares | As a % of grand total (A) + (B) + (C) | Number | As a % | As a % of grand total (A) + (B) + (C) of sub-clause (I) (a) |
| 1 | SANTHANAM SUNDARARAJAN | 193316 | 1.89 | 0 | 0 | 0 |
| 2 | S.SANTHANAM | 65683 | 0.64 | 0 | 0 | 0 |
| 3 | GEETHA S. | 110394 | 1.08 | 0 | 0 | 0 |
| 4 | DEEPA AJAY | 68634 | 0.67 | 0 | 0 | 0 |
| 5 | S.VARADHARAJAN | 51459 | 0.50 | 0 | 0 | 0 |
| 6 | S VARADHARAJAN | 1896 | 0.02 | 0 | 0 | 0 |
| 7 | BINA RAJAN | 3600 | 0.04 | 0 | 0 | 0 |
| 8 | S.NARAYAN | 43700 | 0.43 | 0 | 0 | 0 |
| 9 | SRIDHAR SUNDARARAJAN | 160898 | 1.57 | 0 | 0 | 0 |
| 10 | SRIDHAR SUNDARARAJAN | 66444 | 0.65 | 0 | 0 | 0 |
| 11 | SRIDHAR SUNDARARAJAN | 83165 | 0.81 | 0 | 0 | 0 |
| 12 | S. SRIDHAR H.U.F | 14 | 0.00 | 0 | 0 | 0 |
| 13 | DAYA SRIDHAR | 126682 | 1.24 | 0 | 0 | 0 |
| 14 | SRINATH SRIDHAR | 127268 | 1.24 | 0 | 0 | 0 |
| 15 | JAYALAKSHMI SUNDARARAJAN | 101193 | 0.99 | 0 | 0 | 0 |
| 16 | KALA SUNDARARAJAN | 94116 | 0.92 | 0 | 0 | 0 |
| 17 | N. R. SWAMY H.U.F | 188 | 0.00 | 0 | 0 | 0 |
| 18 | RANGASWAMY ANDAL | 8406 | 0.08 | 0 | 0 | 0 |
| 19 | RANGASWAMY SAMPATH | 3188 | 0.03 | 0 | 0 | 0 |
| 20 | RANGASWAMY SAMPATH | 91215 | 0.89 | 0 | 0 | 0 |
| 21 | R.SAMPATH | 156669 | 1.53 | 0 | 0 | 0 |
| 22 | SUJATHA SAMPATH | 79771 | 0.78 | 0 | 0 | 0 |
| 23 | SUJATHA SAMPATH | 82807 | 0.81 | 0 | 0 | 0 |
| 24 | RAMYA BHARATRAM | 8596 | 0.08 | 0 | 0 | 0 |
| 25 | S.VIDHYA | 21207 | 0.21 | 0 | 0 | 0 |
| 26 | GAYATHRI SAMPATH | 188 | 0.00 | 0 | 0 | 0 |
| 27 | PARTHASARATHY RANGASWAMY | 171494 | 1.67 | 0 | 0 | 0 |
| 28 | PARTHASARATHY RANGASWAMY | 49330 | 0.48 | 0 | 0 | 0 |
| 29 | RANGASWAMY PARTHASARATHY | 29326 | 0.29 | 0 | 0 | 0 |
| 30 | BHOOMA PARTHASARATHY | 185595 | 1.81 | 0 | 0 | 0 |
| 31 | BHOOMA PARTHASARATHY | 48820 | 0.48 | 0 | 0 | 0 |
| 32 | TARA PARTHASARATHY | 188 | 0.00 | 0 | 0 | 0 |
| 33 | MEERA PARTHASARATHY | 188 | 0.00 | 0 | 0 | 0 |
| 34 | INDIRA SUNDARARAJAN | 104534 | 1.02 | 0 | 0 | 0 |
| 35 | S. JAYASHREE | 27762 | 0.27 | 0 | 0 | 0 |
| 36 | JASMINE LTD | 653655 | 6.38 | 0 | 0 | 0 |
| 37 | ULTRAMARINE & PIGMENTS LTD | 2045177 | 19.97 | 0 | 0 | 0 |
| 38 | V.S. SUNDARARAJAN | 1514 | 0.01 | 0 | 0 | 0 |
| 39 | V.S. SUNDARARAJAN | 500 | 0.00 | 0 | 0 | 0 |
| 40 | V.S. SUNDARARAJAN | 1050 | 0.01 | 0 | 0 | 0 |
| 41 | ARVIND S. | 750 | 0.01 | 0 | 0 | 0 |
| 42 | JASMINE LTD | 1350 | 0.01 | 0 | 0 | 0 |
| 43 | KALA SUNDARARAJAN | 657 | 0.01 | 0 | 0 | 0 |
| 44 | ADITYA RAJAN | 5000 | 0.05 | 0 | 0 | 0 |
| 45 | KAVYA NARAYAN | 5000 | 0.05 | 0 | 0 | 0 |
| 46 | UTTARA B. | 4000 | 0.04 | 0 | 0 | 0 |
| #47 | SANKARANARAYANA RAMA IYER | 30000 | 0.29 | 0 | 0 | 0 |
| 48 | ATUL JITENDRA AGARWAL | 15000 | 0.15 | 0 | 0 | 0 |
| | TOTAL | 5131587 | 50.12 | 0 | 0 | 0 |

NOTE # SANKARANARAYANA RAMA IYER'S INDIVIDUAL SHARES TRANSFERRED TO RAMA IYER FAMILY PRIVATE TRUST & MANAGED BY DSP MERRILL LYNCH TRUST SERVICES LIMITED.