

CLAUSE 35

FORM OF SHAREHOLDING PATTERN

NAME OF THE COMPANY : STERLING HOLIDAY RESORTS (INDIA) LIMITED
SCRIP CODE : BSE - 523363; MSE - STERLHOLID
QUARTER ENDING : 31ST MARCH, 2011
SHAREHOLDING PATTERN AS ON : 31ST MARCH, 2011 CLASS OF SECURITY : EQUITY SHARES

| Partly paid-up shares:- | No. of partly paid-up shares | As a % of total no. of partly paid-up shares | As a % of total No. of shares of the Company |
|-----------------------------------|------------------------------|--|--|
| Held by Promoter / Promoter Group | Nil | Nil | Nil |
| Held by Public | Nil | Nil | Nil |
| TOTAL | Nil | Nil | Nil |

| Outstanding Convertible Securities: | No. of outstanding Securities | As a % of total no. of outstanding convertible securities | As a % of total No. of shares of the Company, assuming full conversion of the convertible securities |
|-------------------------------------|-------------------------------|---|--|
| Held by Promoter / Promoter Group | Nil | Nil | Nil |
| Held by Public | Nil | Nil | Nil |
| TOTAL | Nil | Nil | Nil |

| Warrants | No. of Warrants | As a % of total no. of Warrants | As a % of total No. of shares of the Company, assuming full conversion of Warrants |
|--|-----------------|---------------------------------|--|
| Held by Promoter / Promoter Group | Nil | Nil | Nil |
| Held by Public | Nil | Nil | Nil |
| TOTAL | Nil | Nil | Nil |
| TOTAL Paid-up Capital of the Company assuming full Conversion of Warrants and convertible securities | Nil | Nil | Nil |

(1)(a) Statement showing Shareholding Pattern

Name of the Company : STERLING HOLIDAY RESORTS (INDIA) LIMITED

Scrip Code : BSE - 523363 MSE : STERLHOLID

Quarter ended : 31st March, 2011

| Category code | Category of Shareholder | Number of Shareholders | Total number of Shares | Number of shares held in Dematerialized | Total Shareholding as a Percentage of Total Number of Shares | | Shares Pledged or otherwise encumbered | |
|---------------|---|------------------------|------------------------|---|--|----------------------------|--|-------------------------|
| | | | | | As a Percentage of (A+B)1 | As a Percentage of (A+B+C) | Number of Shares | As a Percentage |
| (I) | (II) | (III) | (IV) | (V) | (VI) | (VII) | (VIII) | (IX)=(VIII) / (IV) *100 |
| (A) | Shareholding of Promoter and Promoter Group | | | | | | | |
| (1) | Indian | | | | | | | |
| (a) | Individuals/ Hindu Undivided Family | 3 | 7217674 | 7217674 | 14.751 | 14.751 | 0 | 0.000 |
| (b) | Central Government/ State Government(s) | | | | | | | |
| (c) | Bodies Corporate | 0 | 0 | 0 | 0.000 | 0.000 | 0 | 0.000 |
| (d) | Financial Institutions/Banks | | | | | | | |
| (e) | Any Other (specify) | | | | | | | |
| | Sub-Total (A) (1) | 3 | 7217674 | 7217674 | 14.751 | 14.751 | 0 | 0.000 |
| (2) | Foreign | | | | | | | |
| (a) | Individuals (Non Resident Individuals/ Foreign Individuals) | 0 | 0 | 0 | 0.000 | 0.000 | 0 | 0.000 |
| (b) | Bodies Corporate | | | | | | | |
| (c) | Institutions | | | | | | | |
| (d) | Any Other | | | | | | | |
| | Sub-Total (A) (2) | 0 | 0 | 0 | 0.000 | 0.000 | 0 | 0.000 |
| | Total Shareholding of Promoter and Promoter Group (A) =(A)(1)+(A)(2) | 3 | 7217674 | 7217674 | 14.751 | 14.751 | 0 | 0.000 |
| (B) | Public Shareholding | | | | | | | |
| (1) | Institutions | | | | | | | |
| (a) | Mutual Funds/ UTI | 8 | 7450 | 100 | 0.015 | 0.015 | NA | NA |
| (b) | Financial Institutions/ Banks | 10 | 4650 | 400 | 0.010 | 0.010 | NA | NA |
| (c) | Central Government/ State Government(s) | 0 | 0 | 0 | 0.000 | 0.000 | NA | NA |
| (d) | Venture Capital Funds | 0 | 0 | 0 | 0.000 | 0.000 | NA | NA |
| (e) | Insurance Companies | 0 | 0 | 0 | 0.000 | 0.000 | NA | NA |
| (f) | Foreign Institutional Investors | 10 | 8529565 | 8527527 | 17.433 | 17.433 | NA | NA |

| Category code | Category of Shareholder | Number of Shareholders | Total number of Shares | Number of Shares held in Dematerialized | Total Shareholding as a Percentage of Total Number of Shares | | Shares Pledged or otherwise encumbered | |
|---------------|--|------------------------|------------------------|---|--|----------------------------|--|-------------------------|
| | | | | | As a Percentage of (A+B)1 | As a Percentage of (A+B+C) | Number of Shares | As a Percentage |
| (I) | (II) | (III) | (IV) | (V) | (VI) | (VII) | (VIII) | (IX)=(VIII) / (IV) *100 |
| (g) | Foreign Venture Capital Investors | 0 | 0 | 0 | 0.000 | 0.000 | NA | NA |
| (h) | Any Other | 0 | 0 | 0 | 0.000 | 0.000 | NA | NA |
| | Sub-Total (B)(1) | 28 | 8541665 | 8528027 | 17.457 | 17.457 | NA | NA |
| (2) | Non-Institutions | | | | | | | |
| (a) | Bodies Corporate | 419 | 6711648 | 6642467 | 13.717 | 13.717 | NA | NA |
| (b) | Individuals - | | | | | | | |
| | i. Individual shareholders holding nominal share capital up to Rs.1 lakh. | 18465 | 4860708 | 3699769 | 9.934 | 9.934 | NA | NA |
| | ii. Individual shareholders holding nominal share capital in excess of Rs.1 lakh. | 116 | 8638167 | 8578067 | 17.655 | 17.655 | NA | NA |
| (c) | Any Other | | | | | | | |
| | - Directors | 6 | 887370 | 524360 | 1.814 | 1.814 | NA | NA |
| | - Hidu Undivided Families | 287 | 722004 | 722004 | 1.476 | 1.476 | NA | NA |
| | - Non Resident Indians | 90 | 547853 | 540992 | 1.120 | 1.120 | NA | NA |
| | - Foreign Corporate Bodies | 1 | 7883839 | 7883839 | 16.113 | 16.113 | NA | NA |
| | - Trusts | 4 | 2841108 | 2836108 | 5.807 | 5.807 | NA | NA |
| | - Clearing Members | 20 | 76549 | 76549 | 0.156 | 0.156 | NA | NA |
| | Sub-Total (B)(2)(c) | 408 | 12958723 | 12583852 | 26.485 | 26.485 | NA | NA |
| | Sub-Total (B)(2) | 19408 | 33169246 | 31504155 | 67.791 | 67.791 | NA | NA |
| | Total Public Shareholding (B) = (B)(1)+(B)(2) | 19436 | 41710911 | 40032182 | 85.249 | 85.249 | NA | NA |
| | TOTAL (A)+(B) | 19439 | 48928585 | 47249856 | 100.000 | 100.000 | 0 | 0.000 |
| (C) | Share held by Custodians and against which Depository Receipts have been issued | | | | | | | |
| (1) | Promoter and Promoter Group | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (2) | Public | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | GRAND TOTAL (A)+(B)+(C) | 19439 | 48928585 | 47249856 | 100.000 | 100.000 | 0 | 0.000 |

STERLING HOLIDAY RESORTS (INDIA) LIMITED

**(I)(b) Statement showing Shareholding of Persons belonging to the category
"Promoter and Promoter Group" as on 31-03-2011**

| Sr. No. | Name of the Shareholder | Total shares held | | Shares pledged or otherwise encumbered | | |
|------------|-------------------------|-------------------|-----------------------------------|--|---------------------------|--|
| | | Number | As a % of grand total (A)+(B)+(C) | Number | As a % (VI)=(V)/(III)*100 | As a % of grand total (A)+(B)+(C) of sub-clause (I)(a) |
| (I) | (II) | (III) | (IV) | (V) | (VI) | (VII) |
| 1 | MR.R.SUBRAMANIAN | 7174 | 0.015 | 0 | 0.000 | 0.000 |
| 2 | MR.SIDHARTH SANKAR S | 3780500 | 7.727 | 0 | 0.000 | 0.000 |
| 3 | MRS. DHANALAKSHMI | 3430000 | 7.010 | 0 | 0.000 | 0.000 |
| | | | | | | |
| | TOTAL | 7217674 | 14.751 | 0 | 0.000 | 0.000 |

STERLING HOLIDAY RESORTS (INDIA) LIMITED

(l)(c) Statement showing Shareholding of persons belonging to the category "Public" and holding more than 1% of the total number of shares

31 - March - 2011

| Sl.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 (l)(a) above} |
|--------|-----------------------------------|------------------|--|
| 1 | PREETI SUHRUD PATEL | 500000 | 1.022 |
| 2 | BLUE OCEAN TRUST (ARUN ARORA) | 2835608 | 5.795 |
| 3 | INDIA DISCOVERY FUND LIMITED | 3274092 | 6.692 |
| 4 | SILVER STALLION LIMITED | 2588117 | 5.290 |
| 5 | INDIA HORIZON FUND LTD | 1686092 | 3.446 |
| 6 | PREMIER INVESTMENT FUND LIMITED | 929226 | 1.899 |
| 7 | RELIGARE FINVEST LTD | 840967 | 1.719 |
| 8 | EDELCAP SECURITIES LIMITED | 708692 | 1.448 |
| 9 | BAY CAPITAL INVESTMENTS LTD | 7883839 | 16.113 |
| 10 | K CHANDRASEKARAN | 512000 | 1.046 |
| 11 | R MOHAN | 2124492 | 4.342 |
| 12 | LEENA INVESTMENTS CONSULTANCY LLP | 653800 | 1.336 |
| 13 | EDELWEISS SECURITIES LTD | 808381 | 1.652 |
| | TOTAL | 25345306 | 51.801 |

STERLING HOLIDAY RESORTS (INDIA) LIMITED

(I) (d) Statement showing details of locked-in shares

31 - March - 2011

| Sl. No. | Name of the Shareholder | Category of Shareholders (Promoters / Public) | Number of locked-in Shares | Locked-in shares as a % of Total Number of Shares (i.e., Grand Total (A)+(B)+(C) indicated in statement at para (I)(a) above) |
|---------|-------------------------|---|----------------------------|---|
| 1 | MRS.S.DHANALAKSHMI | Promoters Group | 3000000 | 6.131 |
| 2 | MR R MOHAN | Public | 400000 | 0.818 |
| 3 | MR. C. SATISH | Public | 100000 | 0.204 |
| | TOTAL | | 3500000 | 7.153 |

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

31 - March - 2011

| Sl. 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) |
|---------|---|---------------------------|---|---|
| NIL | NIL | NIL | NIL | NIL |
| | TOTAL | NIL | NIL | NIL |

(II) (b) Statement showing Holding of Depository Receipts (DRs), where underlying shares held by Promoter / Promoter Group' are in excess of 1% of the total number of shares

31 - March - 2011

| Sl. 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) |
|---------|-----------------------|---|---|---|
| NIL | NIL | NIL | NIL | NIL |
| | TOTAL | NIL | NIL | NIL |