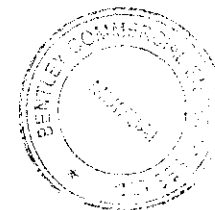


Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015				
1	Name of Listed Entity: Bentley Commercial Enterprises Ltd			
2	Scrip Code/Name of Scrip/Class of Security: 512195 / EQUITY			
3	Share Holding Pattern Filed under: <del>Reg. 31(1)(a)</del> / Reg. 31(1)(b)/ <del>Reg. 31(1)(c)</del> -For the Quarter ended on : December 31, 2015			
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

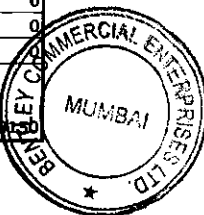


5 The tabular format for disclosure of holding of specified securities is as follows:

Bentley Commercial Enterprises Ltd																		
Table I - Summary Statement holding of specified securities																		
Category	Category of shareholder	Number of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total number of shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including	Shareholding, as a % assuming full conversion of convertible securities	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
								No of Voting Rights		Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)		
								Class eg: Equity	Class eg: y									Total
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+ (VI)	(VIII)As a % of (A+B+C2)	(IX)			(X)	(XI)= (VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(XIV)	
(A)	Promoter & Promoter Group	10	739150	0	0	739150	74.2118	739150	0	739150	74.2118	0	74.2118	0	0.0000	0	0.0000	739150
(B)	Public	389	256850	0	0	256850	25.7882	256850	0	256850	25.7882	0	25.7882	0	0.0000	0	0.0000	100
(C)	Non Promoter - Non Public				0				0			0			0.0000	0	0.0000	
(C1)	Shares Underlying DRs	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Total	399	996000	0	0	996000	100.0000	996000	0	996000	100.0000	0	100.0000	0	0.0000	0	0.0000	739250

**Bentley Commercial Enterprises Ltd**
**Table II - Statement showing shareholding pattern of the Promoter and Promoter Group**

Category	Category & Name of shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total number of shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
									No of Voting Rights		Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)		
									Class eg: Equity	Class eg: y									Total
	(i)	(ii)	(iii)	(iv)	(v)	(vi)	(VII) = (IV)+(V)+ (VI)	(VIII) As a % of (A+B+C2)	(IX)			(X)	(XI)= (VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(XIV)	
<b>1</b>	<b>Indian</b>																		
(a)	Individuals / Hindu Undivided Family		6	259000	0	0	259000	26.0040	259000	0	259000	26.0040	0	26.0040	0	0.0000	0	0.0000	259000
	Babulal Mishrimal Bhansali	AAABP1228N	1	195000	0	0	195000	19.5783	195000	0	195000	19.5783	0	19.5783	0	0.0000	0	0.0000	195000
	Babulal Mishrimal Bhansali	AAACH8614B	1	50000	0	0	50000	5.0201	50000	0	50000	5.0201	0	5.0201	0	0.0000	0	0.0000	50000
	Bhavana Bhansali	AAAPB8923H	1	7100	0	0	7100	0.7129	7100	0	7100	0.7129	0	0.7129	0	0.0000	0	0.0000	7100
	Neetu Bhansali	AAAPB8922G	1	3000	0	0	3000	0.3012	3000	0	3000	0.3012	0	0.3012	0	0.0000	0	0.0000	3000
	Dhudevi Babulal Bhansali	ABAPB3980H	1	2600	0	0	2600	0.2610	2600	0	2600	0.2610	0	0.2610	0	0.0000	0	0.0000	2600
	Jayesh Babulal Bhansali	AAAPB8921F	1	1300	0	0	1300	0.1305	1300	0	1300	0.1305	0	0.1305	0	0.0000	0	0.0000	1300
(b)	Central Government / State Government(s)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Financial Institutions / Banks		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(d)	Any Other (Specify)		4	480150	0	0	480150	48.2078	480150	0	480150	48.2078	0	48.2078	0	0.0000	0	0.0000	480150
	Bodies Corporate		4	480150	0	0	480150	48.2078	480150	0	480150	48.2078	0	48.2078	0	0.0000	0	0.0000	480150
	Bhansali Industrial Investment And Finance Pvt Ltd	AAACB3328B	1	184300	0	0	184300	18.5040	184300	0	184300	18.5040	0	18.5040	0	0.0000	0	0.0000	184300
	Bhansali Engineering Industries Private Limited	AAACB4926C	1	165600	0	0	165600	16.6265	165600	0	165600	16.6265	0	16.6265	0	0.0000	0	0.0000	165600
	Bhansali Innovative Finance Pvt Ltd	AAACB9558L	1	88800	0	0	88800	8.9157	88800	0	88800	8.9157	0	8.9157	0	0.0000	0	0.0000	88800
	Bhansali International Private Ltd	AAACB3338D	1	41450	0	0	41450	4.1616	41450	0	41450	4.1616	0	4.1616	0	0.0000	0	0.0000	41450
	<b>Sub Total (A)(1)</b>		<b>10</b>	<b>739150</b>	<b>0</b>	<b>0</b>	<b>739150</b>	<b>74.2118</b>	<b>739150</b>	<b>0</b>	<b>739150</b>	<b>74.2118</b>	<b>0</b>	<b>74.2118</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>739150</b>
<b>2</b>	<b>Foreign</b>																		
(a)	Individuals (Non-Resident Individuals / Foreign Individuals)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(b)	Government		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Institutions		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(d)	Foreign Portfolio Investor		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(e)	Any Other (Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	<b>Sub Total (A)(2)</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>
	<b>Total Shareholding Of Promoter And Promoter Group (A)= (A)(1)+(A)(2)</b>		<b>10</b>	<b>739150</b>	<b>0</b>	<b>0</b>	<b>739150</b>	<b>74.2118</b>	<b>739150</b>	<b>0</b>	<b>739150</b>	<b>74.2118</b>	<b>0</b>	<b>74.2118</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>739150</b>



**Bentley Commercial Enterprises Ltd**

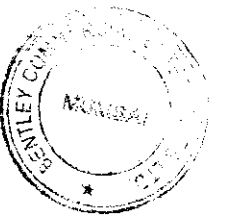
**Table III - Statement showing shareholding pattern of the Public shareholder**

Category	Category & Name of shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total number of shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding, as a % assuming full conversion of convertible securities (as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
									No. of Voting Rights					Total as a % of (A+B+C)	No. (a)	As a % of total Shares held(b)	No. (a)		As a % of total Shares held(b)
									Class eg: Equity	Class eg: y	Total								
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+(VI)	(VIII) As a % of (A+B+C2)				(XI) = (VII)+(X) As a % of (A+B+C2)	(XII)	(XIII)	(XIV)					
<b>1</b>	<b>Institutions</b>																		
(a)	Mutual Fund		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(b)	Venture Capital Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(c)	Alternate Investment Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(d)	Foreign Venture Capital Investors		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(e)	Foreign Portfolio Investor		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(f)	Financial Institutions / Banks		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(g)	Insurance Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(h)	Provident Funds/ Pension Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(i)	Any Other (Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
	Sub Total (B)(1)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
	Central Government/ State Government(s)/ President of India																		
	Sub Total (B)(2)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
<b>3</b>	<b>Non-Institutions</b>																		
(a)	Individuals			0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
	i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.		386	154600	0	0	154600	15.5221	154600	0	154600	15.5221	0	15.5221	0	0.0000	0	0.0000	
	RAMESHKUMAR M SETH			18700	0	0	18700	1.8775	18700	0	18700	1.8775	0	1.8775	0	0.0000	0	0.0000	
	DEEPAK CHANDAN			18500	0	0	18500	1.8574	18500	0	18500	1.8574	0	1.8574	0	0.0000	0	0.0000	
	RAMESH BOKADIA			16100	0	0	16100	1.6165	16100	0	16100	1.6165	0	1.6165	0	0.0000	0	0.0000	
	JAYA KANUNGO			14750	0	0	14750	1.4809	14750	0	14750	1.4809	0	1.4809	0	0.0000	0	0.0000	
	PARASMAL M MEHTA			14700	0	0	14700	1.4759	14700	0	14700	1.4759	0	1.4759	0	0.0000	0	0.0000	
	MAHENDRA K MEHTA			13400	0	0	13400	1.3454	13400	0	13400	1.3454	0	1.3454	0	0.0000	0	0.0000	
	ADITYA SRIVASTAVA			12500	0	0	12500	1.2550	12500	0	12500	1.2550	0	1.2550	0	0.0000	0	0.0000	
	ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.		2	52650	0	0	52650	5.2861	52650	0	52650	5.2861	0	5.2861	0	0.0000	0	0.0000	
	Meenakshi A Doshi			24000	0	0	24000	2.4096	24000	0	24000	2.4096	0	2.4096	0	0.0000	0	0.0000	
	Pankaj G Jain			28650	0	0	28650	2.8765	28650	0	28650	2.8765	0	2.8765	0	0.0000	0	0.0000	
(b)	NBFCs registered with RBI		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(c)	Employee Trusts		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(d)	Overseas Depositories(holding DRs) (balancing figure)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(e)	Any Other (Specify)		1	49600	0	0	49600	4.9799	49600	0	49600	4.9799	0	4.9799	0	0.0000	0	0.0000	
	Bodies Corporate		1	49600	0	0	49600	4.9799	49600	0	49600	4.9799	0	4.9799	0	0.0000	0	0.0000	
	Jagruti Resins Private Limited			49600	0	0	49600	4.9799	49600	0	49600	4.9799	0	4.9799	0	0.0000	0	0.0000	
	Sub Total (B)(3)		389	256850	0	0	256850	25.7882	256850	0	256850	25.7882	0	25.7882	0	0.0000	0	0.0000	
	Total Public Shareholding (B) = (B)(1)+(B)(2)+(B)(3)		389	256850	0	0	256850	25.7882	256850	0	256850	25.7882	0	25.7882	0	0.0000	0	0.0000	

Note. 1 There is no other person acting in concert in company except its Promoter and Promoter group persons, as may be applicable.

Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

Unclaimed Shares	No. of Shareholders	Demat/Unclaimed Suspense A/c	Voting Right which are frozen
Nil	Nil	Nil	N/A



**Bentley Commercial Enterprises Ltd**
**Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder**

Category	Category & Name of shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total number of shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including	Shareholding, as a % assuming full conversion of convertible securities	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
									No of Voting Rights		Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)		
									Class eg: X	Class eg: Y									Total
	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) = (IV)+(V)+ (VI)	(VIII) As a % of (A+B+C2)	(IX)			(X)	(XI) = (VII)+(X) As a % of (A+B+C2)	(XII)		(XIII)		(XIV)	
1	Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
2	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	<b>Total Non-Promoter- Non Public Shareholding (C)= (C)(1)+(C)(2)</b>		<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>	<b>0.0000</b>	<b>0</b>