

**General information about company**

Scrip code	539693
Name of the company	ALORA TRADING CO LTD
Whether company is SME	No
Class of Security	Equity Shares
Type of report	Quarterly
Quarter Ended / Half year ended/Date of Report (For Prelisting / Allotment)	31-12-2016
Date of allotment / extinguishment (in case Capital Restructuring selected) / Listing Date	
Shareholding pattern filed under	Regulation 31 (1) (b)

Sr. No.	<b>Particular</b>	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 ?	No
3	Whether the Listed Entity has issued any Warrants ?	No
4	Whether the Listed Entity has any shares against which depository receipts are issued?	No
5	Whether the Listed Entity has any shares in locked-in?	Yes
6	Whether any shares held by promoters are pledge or otherwise encumbered?	No
7	Whether company has equity shares with differential voting rights?	No

**Table I - Summary Statement holding of specified securities**

Category (I)	Category of shareholder (II)	Nos. Of shareholders (III)	No. of fully paid up equity shares held (IV)	No. Of Partly paid-up equity shares held (V)	No. Of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+ (V)+ (VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			
								No of Voting (XIV) Rights			Total as a % of (A+B+C)
								Class eg: X	Class eg:y	Total	
(A)	Promoter & Promoter Group	1	1500000			1500000	12.06	1500000		1500000	12.06
(B)	Public	685	10942500			10942500	87.94	10942500		10942500	87.94
(C)	Non Promoter-Non Public										
(C1)	Shares underlying DRs										
(C2)	Shares held by Employee Trusts										
	Total	686	12442500			12442500	100	12442500		12442500	100

**Table I - Summary Statement holding of specified securities**

Category (I)	Category of shareholder (II)	No. Of Shares Underlying Outstanding convertible securities (X)	No. of Shares Underlying Outstanding Warrants (Xi)	No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
						No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)	
(A)	Promoter & Promoter Group				12.06	1500000	100			1500000
(B)	Public				87.94	0	0			10754700
(C)	Non Promoter-Non Public									
(C1)	Shares underlying DRs									
(C2)	Shares held by Employee Trusts									
	Total				100	1500000	12.06			12254700

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

Sr.	Category & Name of the Shareholders (I)	Nos. Of shareholders (III)	No. of fully paid up equity shares held (IV)	No. Of Partly paid-up equity shares held (V)	No. Of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	Number of Voting Rights held in each class of securities (IX)			
								No of Voting (XIV) Rights			Total as a % of Total Voting rights
								Class eg: X	Class eg:y	Total	
A	Table II - Statement showing shareholding pattern of the Promoter and Promoter Group										
(1)	Indian										
(d)	Any Other (specify)	1	1500000			1500000	12.06	1500000		1500000	12.06
Sub-Total (A) (1)		1	1500000			1500000	12.06	1500000		1500000	12.06
(2)	Foreign										
Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A) (2)		1	1500000			1500000	12.06	1500000		1500000	12.06
B	Table III - Statement showing shareholding pattern of the Public shareholder										
(1)	Institutions										
( 3 )	Non-institutions										
(a(i))	Individuals - i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.	517	439265			439265	3.53	439265		439265	3.53
(a(ii))	Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	76	7648989			7648989	61.47	7648989		7648989	61.47
(e)	Any Other (specify)	92	2854246			2854246	22.94	2854246		2854246	22.94
Sub-Total (B) (3)		685	10942500			10942500	87.94	10942500		10942500	87.94
Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)		685	10942500			10942500	87.94	10942500		10942500	87.94
C	Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder										
Total ( A+B+C2 )		686	12442500			12442500	100	12442500		12442500	100
Total (A+B+C)		686	12442500			12442500	100	12442500		12442500	100

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

Sr.	No. Of Shares Underlying Outstanding convertible securities (X)	No. of Shares Underlying Outstanding Warrants (Xi)	No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
					No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)	
A	Table II - Statement showing shareholding pattern of the Promoter and Promoter Group								
(1)	Indian								
(d)				12.06	1500000	100			1500000
Sub-Total (A) (1)				12.06	1500000	100			1500000
(2)	Foreign								
Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)				12.06	1500000	100			1500000
B	Table III - Statement showing shareholding pattern of the Public shareholder								
(1)	Institutions								
( 3 )	Non-institutions								
(a(i))				3.53	0	0			251985
(a(ii))				61.47	0	0			7648989
(e)				22.94	0	0			2853726
Sub-Total (B) (3)				87.94	0	0			10754700
Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)				87.94	0	0			10754700
C	Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder								
Total ( A+B+C2 )				100	1500000	12.06			12254700
Total (A+B+C )				100	1500000	12.06			12254700

**Any Other (specify)**

Serial No.	1	
Category	Bodies Corporate	<a href="#">Click here to go back</a>
Name of the Shareholders (I)	MACARIO TRADING LLP	
PAN (II)	AAXFM0654P	Total
No. of the Shareholders (I)	1	1
No. of fully paid up equity shares held (IV)	1500000	1500000
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	1500000	1500000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	12.06	12.06
<b>Number of Voting Rights held in each class of securities (IX)</b>		
Class eg: X	1500000	1500000
Class eg:y		
Total	1500000	1500000
Total as a % of Total Voting rights	12.06	12.06
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	12.06	12.06
<b>Number of Locked in shares (XII)</b>		
No. (a)	1500000	1500000
As a % of total	100	100

Shares held (b)		
Number of Shares pledged or otherwise encumbered (XIII)		
No. (a)		
As a % of total Shares held (b)		
Number of equity shares held in dematerialized form (XIV)	1500000	1500000
Reason for not providing PAN		



**Individuals - i.Individual shareholders holding nominal share capital up to Rs. 2 lakhs.**

Serial No.	1	
Name of the Shareholders (I)	517 Shareholder	<a href="#">Click here to go back</a>
PAN (II)	ZZZZZ9999Z	Total
No. of fully paid up equity shares held (IV)	439265	439265
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	439265	439265
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	3.53	3.53
<b>Number of Voting Rights held in each class of securities (IX)</b>		
Class eg: X	439265	439265
Class eg:y		
Total	439265	439265
Total as a % of Total Voting rights	3.53	3.53
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	3.53	3.53
<b>Number of Locked in shares (XII)</b>		
No. (a)	0	0
As a % of total Shares held (b)	0	0
Number of equity shares held in dematerialized form (XIV)	251985	251985

Reason for not providing PAN	
Reason for not providing PAN	Textual Information(1)

**Text Block**

Textual Information(1)

PAN is not Mandatory for Shareholders holding more than 1% share

<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Serial No.	1	2	3	4	5	6	7
Name of the Shareholders (I)	48 Shareholders	THAKKAR JAGDISHBHAI DAHYALAL	BHAVNABEN JAGDISHKUMAR THAKKAR	RITABEN VIPULBHAI VAGHANI	REKHABEN JITUBHAI VAGHANI	ASHMITABEN KIRITBHAI VAGHANI	JITUBHAI NATHUBHAI VAGHANI
PAN (II)	ZZZZZ9999Z	ABIPT2969A	ACVPT1929N	ADHPV2333B	ADHPV2332A	ADHPV2331D	AAWPV8522C
No. of fully paid up equity shares held (IV)	2118989	400000	350000	250000	250000	250000	250000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	2118989	400000	350000	250000	250000	250000	250000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	17.03	3.21	2.81	2.01	2.01	2.01	2.01
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	2118989	400000	350000	250000	250000	250000	250000
Class eg:y							
Total	2118989	400000	350000	250000	250000	250000	250000
Total as a % of Total Voting rights	17.03	3.21	2.81	2.01	2.01	2.01	2.01
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As	17.03	3.21	2.81	2.01	2.01	2.01	2.01

a % of (A+B+C2)							
Number of Locked in shares (XII)							
No. (a)	0	0	0	0	0	0	0
As a % of total Shares held (b)	0	0	0	0	0	0	0
Number of equity shares held in dematerialized form (XIV)	2118989	400000	350000	250000	250000	250000	250000
Reason for not providing PAN							
Reason for not providing PAN	Textual Information(1)						

<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Searial No.	8	9	10	11	12	13	14
Name of the Shareholders (I)	VIPULKUMAR NATHUBHAI VAGHANI	KIRITBHAI NATHUBHAI VAGHANI	AVDHESH MISHRA	SHIV SARAN MEHRA	JOSHI HAARD SHAILESHKUMAR	ATUL MADHUKAR BIRLA	PRAFULKUMAR LAXMANBHAI PATEL
PAN (II)	AAWPV8521B	AAWPV8520A	AAIPM9379E	AAIPM3359E	AJPPJ1428B	AIBPB2695K	AHLPP2330E
No. of fully paid up equity shares held (IV)	250000	250000	200000	200000	150000	150000	150000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	250000	250000	200000	200000	150000	150000	150000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	2.01	2.01	1.61	1.61	1.21	1.21	1.21
<b>Number of Voting Rights held in each class of securities (IX)</b>							
Class eg: X	250000	250000	200000	200000	150000	150000	150000
Class eg:y							
Total	250000	250000	200000	200000	150000	150000	150000
Total as a % of Total Voting rights	2.01	2.01	1.61	1.61	1.21	1.21	1.21
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	2.01	2.01	1.61	1.61	1.21	1.21	1.21

Number of Locked in shares (XII)							
No. (a)	0	0	0	0	0	0	0
As a % of total Shares held (b)	0	0	0	0	0	0	0
Number of equity shares held in dematerialized form (XIV)	250000	250000	200000	200000	150000	150000	150000
Reason for not providing PAN							
Reason for not providing PAN							

<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Serial No.	15	16	17	18	19	20	21
Name of the Shareholders (I)	BHARGAV RATIBHAI PATEL	RATIBHAI PRABHUDAS PATEL	SHYAMAL ANIL BODANI	Mehta Malav Ajitbhai	Niruben Shantilal Tank	ISHWARBHAI NARSHINBHAI PATEL	KANKUBEN MANSINGBHAI PATEL
PAN (II)	AGPPP5443H	ADGPP7029P	ADAPB7590D	ACBPM6865G	ABTPT7753P	ABNPP8460H	ABIPP5753A
No. of fully paid up equity shares held (IV)	150000	150000	150000	150000	150000	150000	150000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+(V)+ (VI)	150000	150000	150000	150000	150000	150000	150000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1.21	1.21	1.21	1.21	1.21	1.21	1.21
<b>Number of Voting Rights held in each class of securities (IX)</b>							
Class eg: X	150000	150000	150000	150000	150000	150000	150000
Class eg:y							
Total	150000	150000	150000	150000	150000	150000	150000
Total as a % of Total Voting rights	1.21	1.21	1.21	1.21	1.21	1.21	1.21
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1.21	1.21	1.21	1.21	1.21	1.21	1.21
<b>Number of Locked in shares (XII)</b>							
No. (a)	0	0	0	0	0	0	0
As a % of total Shares held (b)	0	0	0	0	0	0	0



Number of equity shares held in dematerialized form (XIV)	150000	150000	150000	150000	150000	150000	150000
Reason for not providing PAN							
Reason for not providing PAN							

<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>							
Serial No.	22	23	24	25	26	27	28
Name of the Shareholders (I)	GITABEN VIPULKUMAR PATEL	KAMLESH TEJARAM AGRAWAL	KIRIT DHIRAJLAL MAGIA	SIDDHARTH GUPTA	AMIT KIRIT MAGIA	GOENKA DIMPLE ROBIN	THAKKAR DHAVAL JAGDISHKUMAR
PAN (II)	ABHPP7548Q	AAZPA8437G	AALPM3372Q	AADPG5651N	AIUPM6273H	ANDPG9739Q	AFWPT1426J
No. of fully paid up equity shares held (IV)	150000	150000	150000	150000	130000	125000	400000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	150000	150000	150000	150000	130000	125000	400000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1.21	1.21	1.21	1.21	1.04	1	3.21
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	150000	150000	150000	150000	130000	125000	400000
Class eg:y							
Total	150000	150000	150000	150000	130000	125000	400000
Total as a % of Total Voting rights	1.21	1.21	1.21	1.21	1.04	1	3.21
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1.21	1.21	1.21	1.21	1.04	1	3.21

Number of Locked in shares (XII)							
No. (a)	0	0	0	0	0	0	0
As a % of total Shares held (b)	0	0	0	0	0	0	0
Number of equity shares held in dematerialized form (XIV)	150000	150000	150000	150000	130000	125000	400000
Reason for not providing PAN							
Reason for not providing PAN							

<b>Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.</b>		
Searial No.	29	
Name of the Shareholders (I)	PRAGNA AMIT SHAH	<a href="#">Click here to go back</a>
PAN (II)	ADDPS6092G	Total
No. of fully paid up equity shares held (IV)	125000	7648989
No. Of Partly paid-up equity shares held (V)		
No. Of shares underlying Depository Receipts (VI)		
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	125000	7648989
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1	61.47
<b>Number of Voting Rights held in each class of securities (IX)</b>		
Class eg: X	125000	7648989
Class eg:y		
Total	125000	7648989
Total as a % of Total Voting rights	1	61.47
No. Of Shares Underlying Outstanding convertible securities (X)		
No. of Shares Underlying Outstanding Warrants (Xi)		
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)		
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1	61.47
<b>Number of Locked in shares (XII)</b>		
No. (a)	0	0
As a % of total Shares held (b)	0	0
Number of equity shares held in dematerialized form (XIV)	125000	7648989

Reason for not providing PAN		
Reason for not providing PAN		

**Text Block**

Textual Information(1)

PAN is not mandatory for shareholders holding more than 1% shares

Any Other (specify)							
Serial No.	1	2	3	4	5	6	7
Category	Bodies Corporate	Bodies Corporate	Bodies Corporate	Bodies Corporate	HUF	HUF	HUF
Category / More than 1 percentage	More than 1 percentage of shareholding	More than 1 percentage of shareholding	More than 1 percentage of shareholding	Category	More than 1 percentage of shareholding	More than 1 percentage of shareholding	More than 1 percentage of shareholding
Name of the Shareholders (I)	AGNITIO TRADING LLP	SANOSAM	SSJ FINANCE & SECURITIES PVT. LTD.		THAKKAR JAGDISHCHANDRA DAHYALAL HUF	Tank Shantilal R	ATUL BIRLA HUF
PAN (II)	AAAYFA0698N	ABZFS3001P	AABCS4245H		AABHT2152H	AALHS7358Q	AAJHA9270P
No. of the Shareholders (I)	1	1	1	13	1	1	1
No. of fully paid up equity shares held (IV)	650000	600000	193428	92094	350000	150000	150000
No. Of Partly paid-up equity shares held (V)							
No. Of shares underlying Depository Receipts (VI)							
Total nos. shares held (VII) = (IV)+(V)+ (VI)	650000	600000	193428	92094	350000	150000	150000
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	5.22	4.82	1.55	0.74	2.81	1.21	1.21
Number of Voting Rights held in each class of securities (IX)							
Class eg: X	650000	600000	193428	92094	350000	150000	150000
Class eg:y							
Total	650000	600000	193428	92094	350000	150000	150000
Total as a % of Total Voting rights	5.22	4.82	1.55	0.74	2.81	1.21	1.21
No. Of Shares Underlying Outstanding convertible securities (X)							
No. of Shares Underlying Outstanding Warrants (Xi)							
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)							
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)=	5.22	4.82	1.55	0.74	2.81	1.21	1.21

(VII)+(X) As a % of (A+B+C2)							
Number of Locked in shares (XII)							
No. (a)	0	0	0	0	0	0	0
As a % of total Shares held (b)	0	0	0	0	0	0	0
Number of equity shares held in dematerialized form (XIV)	650000	600000	193428	92094	350000	150000	150000
Reason for not providing PAN							
Reason for not providing PAN							



**Any Other (specify)**

Serial No.	8	9	10	
Category	HUF	HUF	Clearing Members	
Category / More than 1 percentage	More than 1 percentage of shareholding	Category	Category	
Name of the Shareholders (I)	TUSHAR SHANTILAL KOTHARI			<a href="#">Click here to go back</a>
PAN (II)	AABHK5493G			Total
No. of the Shareholders (I)	1	67	5	85
No. of fully paid up equity shares held (IV)	150000	498721	20003	610818
No. Of Partly paid-up equity shares held (V)				
No. Of shares underlying Depository Receipts (VI)				
Total nos. shares held (VII) = (IV)+ (V)+ (VI)	150000	498721	20003	610818
Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)	1.21	4.01	0.16	4.91
<b>Number of Voting Rights held in each class of securities (IX)</b>				
Class eg: X	150000	498721	20003	610818
Class eg:y				
Total	150000	498721	20003	610818
Total as a % of Total Voting rights	1.21	4.01	0.16	4.91
No. Of Shares Underlying Outstanding convertible securities (X)				
No. of Shares Underlying Outstanding Warrants (Xi)				
No. Of Shares Underlying Outstanding convertible securities and No. Of Warrants (Xi) (a)				
Shareholding , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)= (VII)+(X) As a % of (A+B+C2)	1.21	4.01	0.16	4.91
<b>Number of Locked in shares (XII)</b>				
No. (a)	0	0	0	0

As a % of total Shares held (b)	0	0	0	0
Number of equity shares held in dematerialized form (XIV)	150000	498201	20003	610298
Reason for not providing PAN				
Reason for not providing PAN				