

PSL/SEC/SE/51/2009-10

October 12, 2009

1. The National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor
Plot No.C/1, G Block
Bandra Kurla Complex
Bandra East
Mumbai – 400051
2. The Bombay Stock Exchange Ltd
1st Floor, New Trading Ring
Rotunda Building, P J Towers
Dalal Street, Fort
Mumbai - 400001
3. Madras Stock Exchange Ltd
Exchange Building
11, Second Line Beach
Chennai - 600001

Dear Sirs

Sub : Distribution of shareholding under Clause 35 of Listing Agreement

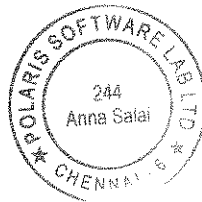
Please find enclosed the shareholding pattern of the Company as on 30.09.2009, as per clause 35 of the Listing Agreement.

This is for your information and records.

Thanking you

**Yours truly,
For Polaris Software Lab Limited**


Raman K.C.
Asst. Vice President-Secretarial



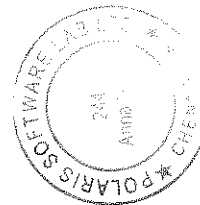
Encl : as above

STATEMENT SHOWING SHAREHOLDING PATTERN IN CLAUSE-35
NAME OF THE COMPANY: POLARIS SOFTWARE LAB LIMITED
SCRIP CODE: 532254 **QUARTER ENDED: 30/09/2009**

CATE GORY CODE	CATEGORY OF SHAREHOLDER	NO OF SHAREHOLDERS (iii)	TOTAL NUMBER OF SHARES (iv)	NO OF SHARES HELD IN DEMATERIALIZED FORM (v)	TOTAL SHAREHOLDING AS A % OF TOTAL NO OF SHARES		SHARES PLEDGE OR OTHERWISE ENCUMBERED
					AS a % of (A+B) (vi)	As a % of (A+B+C) (vii)	
(A)	PROMOTER AND PROMOTER GROUP						
(1)	INDIAN						
(a)	Individual /HUF	17	8897221	8885221	9.02	9.02	0.00
(b)	Central Government/State Government(s)	0	0	0	0.00	0.00	0.00
(c)	Bodies Corporate	1	19880938	19880938	20.15	20.15	0.00
(d)	Financial Institutions / Banks	0	0	0	0.00	0.00	0.00
(e)	Others	0	0	0	0.00	0.00	0.00
	Sub-Total A(1) :	18	28778159	28766159	29.16	29.16	0.00
(2)	FOREIGN						
(a)	Individuals (NRIs/Foreign Individuals)	0	0	0	0.00	0.00	0.00
(b)	Bodies Corporate	0	0	0	0.00	0.00	0.00
(c)	Institutions	0	0	0	0.00	0.00	0.00
(d)	Others	0	0	0	0.00	0.00	0.00
	Sub-Total A(2) :	0	0	0	0.00	0.00	0.00
	Total Shareholding of Promoter and Promoter Group A=A(1)+A(2)	18	28778159	28766159	29.16	29.16	0.00
(B)	PUBLIC SHAREHOLDING						
(1)	INSTITUTIONS						
(a)	Mutual Funds /UTI	17	3556764	3556764	3.60	3.60	0.00
(b)	Financial Institutions /Banks	11	23288355	23288355	23.60	23.60	0.00
(c)	Central Government / State Government(s)	0	0	0	0.00	0.00	0.00
(d)	Venture Capital Funds	0	0	0	0.00	0.00	0.00
(e)	Insurance Companies	0	0	0	0.00	0.00	0.00
(f)	Foreign Institutional Investors	41	7097724	7097574	7.19	7.19	0.00
(g)	Foreign Venture Capital Investors	0	0	0	0.00	0.00	0.00
(h)	Others	0	0	0	0.00	0.00	0.00
	Sub-Total B(1) :	69	33942843	33942693	34.39	34.39	0.00



CATE GORY CODE	CATEGORY OF SHAREHOLDER	NO OF SHAREHOLDERS	TOTAL NUMBER OF SHARES	NO OF SHARES HELD IN DEMATERIALIZED FORM	TOTAL SHAREHOLDING AS A % OF TOTAL NO OF SHARES		SHARES PLEDGE OR OTHERWISE ENCUMBERED
					AS a % of (A+B)	As a % of (A+B+C)	
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii)	(viii)
(2)	NON-INSTITUTIONS						
(a)	Bodies Corporate	1055	19849153	19839403	20.11	20.11	0
(b)	Individuals						
	(i) Individuals holding nominal share capital upto Rs.1 lakh	50539	9770018	9444031	9.90	9.90	0
	(ii) Individuals holding nominal share capital in excess of Rs.1 lakh	37	2195136	2195136	2.22	2.22	0
(c)	Others						
	NON RESIDENT INDIANS	499	241307	237007	0.24	0.24	0
	TRUSTS	11	2321249	2298949	2.35	2.35	0
	OVERSEAS CORPORATE BODIES	3	600	550	0.00	0.00	0
	CLEARING MEMBERS	274	1590032	1590032	1.61	1.61	0
	Sub-Total B(2) :	52418	35967495	35605108	36.45	36.45	0
	Total Public Shareholding B=B(1)+B(2)	52487	69910338	69547801	70.84	70.84	0
	Total (A+B) :	52505	98688497	98313960	100.00	100.00	0
(C)	Shares held by custodians, against which Depository Receipts have been issued	0	0	0	0.00	0.00	0
	GRAND TOTAL (A+B+C) :	52505	98688497	98313960	100.00	100.00	0



KC.Raman
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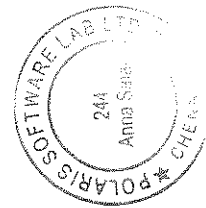
Assistant Vice President - Secretarial


Chennai
12.10.2009

POLARIS SOFTWARE LAB LIMITED

STATEMENT SHOWING SHAREHOLDING OF PERSONS BELONGING TO "PROMOTER GROUP"

SLNO	NAME OF THE SHAREHOLDER	TOTAL SHARES HELD		SHARES PLEDGED OR OTHERWISE ENCUMBERED			AS a % OF GRAND TOTAL (VII)
		TOTAL SHARES (III)	AS a % OF GRAND TOTAL (A)+(B)+(C) (IV)	PLEDGE SHARES (V)	As a % (VI)=(V)/(III)	AS a % OF GRAND TOTAL	
(i)	(ii)						
1	POLARIS HOLDINGS LIMITED	19,880,938	20.15	0	0.00	0.00	0.00
2	ARUN JAIN	4,302,364	4.36	0	0.00	0.00	0.00
3	YOGESH ANDLAY	2,075,047	2.10	0	0.00	0.00	0.00
4	MANJU JAIN	1,022,460	1.04	0	0.00	0.00	0.00
5	ARUN JAIN	789,000	0.80	0	0.00	0.00	0.00
6	UDAY JAIN	619,500	0.63	0	0.00	0.00	0.00
7	AARUSHI JAIN	60,000	0.06	0	0.00	0.00	0.00
8	MEENA AGARWAL	5,250	0.01	0	0.00	0.00	0.00
9	NAVEEN KUMAR	2,400	0.00	0	0.00	0.00	0.00
10	MANJU VERMA	2,400	0.00	0	0.00	0.00	0.00
11	UMA GUPTA	2,400	0.00	0	0.00	0.00	0.00
12	USHA JAIN	2,400	0.00	0	0.00	0.00	0.00
13	NITA JAIN	2,400	0.00	0	0.00	0.00	0.00
14	NEETA MATHUR	2,400	0.00	0	0.00	0.00	0.00
15	MATHUR R D	2,400	0.00	0	0.00	0.00	0.00
16	ARUNA GUPTA	2,400	0.00	0	0.00	0.00	0.00
17	SUMAN MATHUR	2,300	0.00	0	0.00	0.00	0.00
18	SHASHI GUPTA	2,100	0.00	0	0.00	0.00	0.00
	TOTAL :	28,778,159	29.16	0	0.00	0.00	0.00

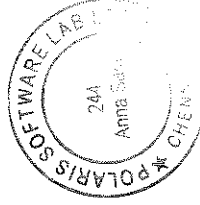



KC.Raman
 Assistant Vice President - Secretarial

Chennai
12.10.2009

POLARIS SOFTWARE LAB LIMITED

STATEMENT SHOWING SHAREHOLDING OF PERSONS BELONGING TO "PUBLIC GROUP" HOLDING > 1% OF THE TOTAL NUMBER OF SHARES			
SLNO	NAME OF THE SHAREHOLDER	NO OF SHARES	PERCENTAGE
1	CITIBANK A/C. ORBITECH LIMITED	22,576,015	22.88
2	ORBITECH LIMITED	17,450,602	17.68
3	ORBITECH EMPLOYEES WELFARE TRUST	1,388,873	1.41
4	CITIGROUP GLB MKT I P L (Clearing member)	1,290,000	1.31
	TOTAL :	42,705,490	43.27



(Signature)
KC.Raman

Assistant Vice President - Secretarial

Chennai
12.10.2009

POLARIS SOFTWARE LAB LIMITED

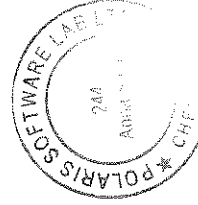
STATEMENT SHOWING DETAILS OF DEPOSITORY RECEIPTS (DRS)		
SLNO	NAME OF THE SHAREHOLDER	PERCENTAGE
	NO OF SHARES	
TOTAL :		0

STATEMENT OF DEPOSITORY RECEIPTS (DRS) HOLDING > 1% OF THE TOTAL NUMBER OF SHARES		
SLNO	NAME OF THE SHAREHOLDER	PERCENTAGE
	NO OF SHARES	
TOTAL :		0

STATEMENT SHOWING DETAILS OF LOCKED-IN SHARES"		
SLNO	NAME OF THE SHAREHOLDER / CAT CODE	PERCENTAGE
	NO OF SHARES	
TOTAL :		0

KC.Rafian

KC.Rafian
Assistant Vice President - Secretarial



Chennai
12.10.2009