Form No. MGT-9 EXTRACT OF ANNUAL RETURN as on the financial year ended on 31st March, 2019

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

S.No.	Particulars	Details
i)	CIN	L27100PB2010PLC033930
ii)	Registration Date	14 th May, 2010
iii)	Name of the Company	Vardhman Special Steels Limited
iv)	Category/ Sub-Category of the	Listed Public Company
	Company	
v)	Address of the Registered office and	Vardhman Premises, Chandigarh
	contact details	Road, Ludhiana-141010, Punjab, India.
vi)	Whether listed company	Yes
vii)	Name, Address and Contact details of	Alankit Assignments Limited
	Registrar and Transfer Agent, if any	1E/13, Alankit Heights, Jhandewalan
		Extn., New Delhi- 110055.
		Phone: 011- 41540060-63
		Fax: 011- 41540064
		E-mail: <u>rta@alankit.com</u>

II. Principal Business Activities of the Company:

All the business activities contributing 10% or more of the total turnover of the Company shall be stated:-

S. No	Name and Description of main products /services	NIC Code of the product/service	%to total turnover of the Company
1.	Steel Bars & Rods	241	96.03%

III. Particulars of Holding, Subsidiary and Associate Companies:

S. No	Name and Address of the company	CIN/ GLN	Holding /Subsidiary /Associate	% of shares held	Applicable section
	N.A.				

IV. Share holding pattern (Equity Share Capital Breakup as percentage of Total Equity)

i) Category –wise share Holding

Category of Shareholders	No. of shar	es held at th	ne beginning of t	he year	No. of s	hares held a	t the end of the y	/ear	% change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
1) Indian									
a) Individuals (including shares held by partners of Partnership firms)	49,78,605	0	49,78,605	13.95	52,77,433	0	52,77,433	14.76	0.81
b) Central Govt./ State Govt. (s)	0	0	0	0	0	0	0	0	0
c) Banks /FI	0	0	0	0	0	0	0	0	0
d) Any other (specify)									
Bodies corporate	1,79,61,137	0	1,79,61,137	50.315	1,79,61,137	0	1,79,61,137	50.23	(0.085)
• LLP	ο	0	0	0	0	0	0	0	0
• Trust	5,32,911	0	5,32,911	1.49	5,32,911	0	5,32,911	1.49	0
Sub -total (A)(1):-	2,34,72,653	0	2,34,72,653	65.755	2,37,71,481	0	2,37,71,481	66.48	0.725
2) Foreign									
a) Individuals (Non- Resident Individuals/ Foreign Individuals)	0	0	0	0	0	0	0	0	0
b) Government	0	0	0	0	0	0	0	0	0
c) Institutions	0	0	0	0	0	0	0	0	0
d) Foreign Portfolio Investor	0	0	0	0	0	0	0	0	0
Sub -total (A)(2):-	0	0	0	0	0	0	0	0	0
TotalShareholdingofPromoterandPromoter Group $(A) = (A) (1) + (A) (2)$	2,34,72,653	0	2,34,72,653	65.755	2,37,71,481	0	2,37,71,481	66.48	0.725
B. Public Shareholding 1. Institutions									
a.) Mutual Funds	17,88,262	4,286	17,92,548	5.022	17,88,262	0	17,88,262	5.00	(0.022)
b.) Venture Capital Funds	0	0	0	0	0	0	0	0	0
c.) Alternate Investment Funds	17,86,000	0	17,86,000	5.003	17,86,000	0	17,86,000	4.99	(0.013)

d.) Foreign Venture	0	0	0	0	0	0	0	0	0
Capital Investors									
e.) Foreign Portfolio	14,249	253	14,502	0.040	14,249	52	14,301	0.39	(0.001)
Investors	14,249	2)5	14, 502	0.040	14,249	2ر	14,501	0.59	(0.001)
f.) Financial	19,450	12,004	31,454	0.088	335	1593	1928	0.005	(0.08)
Institutions/ Banks	· 5/750	12,004	דעדויע	01000		.,,,,	1920	0.00)	(0.00)
g.) Insurance	41,407	315	41,722	0.117	41,407	0	41,407	0.116	(0.001)
Companies	+1,107	.,,	7.9722	01117	+1)+07	0	+1,+07	01110	(0.001)
h.) Provident Funds/	0	0	0	0	0	0	0	0	0
Pension Funds			-	Ū	Ū.	•	· ·	, i i i i i i i i i i i i i i i i i i i	÷
i.) Any other (specify)	0	0	0	0	15	0	15	0.00	0
Sub -total (B)(1):-	36,49,383	16,858	36,66,241	10.270	36,30,268	1,645	36,31,913	10.156	(0.12)
2. Central	0	0	0	0	0	0	0	0	0
Government/ State			Ĵ	· ·	•		· ·	, i i i i i i i i i i i i i i i i i i i	Ū.
Government (s)/									
President of India									
Sub- Total (B)(2)	0	0	0	0	0	0	0	0	0
3. Non Institutions									
a) Individuals – i.	38,39,924	2,03,868	40,43,792	11.328	39,76,185	1,92,958	41,69,143	11.66	0.332
Individual	5-15515-1	_,,	1-712/17-		2011-1-2	.,,-,,,,-	1.1- 51.15))-
shareholders									
holding nominal									
share capital up to									
Rs. 2 lakhs									
ii. Individual	31,55,377	0	31,55,377	8.839	31,48,825	0	31,48,825	8.81	(0.029)
shareholders	2 / 2 2 / 2 1 1				27.7.2				· · · · · · · · · · · · · · · · · · ·
holding nominal									
share capital in									
excess of Rs. 2 lakhs									
b) NBFCs registered	6448	0	6448	0.018	0	0	0	0	(0.018)
with RBI									
c) Employee Trusts	0	0	0	0	0	0	0	0	0
d) Overseas	0	0	0	0	0	0	0	0	0
Depositories									
(holding DRs)									
(balancing figures)									
e) Any Other (specify)									
e-1) Clearing Member	13,523	0	13,523	0.038	7,299	0	7,299	0.02	(0.018)
e-2) Corporate Body	8,45,251	8,383	8,53,634	2.391	5,66,696	5,242	5,71,938	1.60	(0.791)
e-3) Foreign Nationals	0	0	0	0	40	0	40	0.00	0.00
e-4) NRI	1,17,568	231	1,17,799	0.33	1,26,617	171	1,26,788	0.35	0.02
e-5) HUF	3,64,373	66	3,64,439	1.021	3,25,971	66	3,26,037	0.91	(0.111)
e-6) Trust	3,470	0	3,470	0.010	5,159	0	5,159	0.014	0.004
Sub-Total (B)(3)	83,45,934	2,12,548	85,58,482	23.975	81,56,792	1,98,437	83,55,229	23.36	(0.610)
Total public	1,19,95,317	2,29,406	1,22,24,723	34.245	1,17,87,060	2,00,082	1,19,87,142	33.52	(0.725)
shareholding (B) =									
(B)(1)+(B)(2)+(B)(3)									
Shares held by	0	0	0	0	0	0	0	0	0
custodian for GDRs &	1								
ADRs (C)									
Grand Total (A+B+C)	3,54,67,970	2,29,406	3,56,97,376	100	3,55,58,541	2,00,082	3,57,58,623	100	0.00

(ii) Shareholding of Promoters:

S.No	Shareholders Name	Shareholding	at the	Shareholding	at the end of	
		beginning of t	he year	year		
		No. of	% of total	No. of	% of total	% change
		shares	shares of the	shares	shares of the	in
			Company		Company	sharehold
						ing during
						the year
1	Adishwar Enterprises LLP	0	0	0	0	0
2	Devakar Investment and Trading	22,15,016	6.20	22,15,016	6.20	0
	Company Private Limited					
3	Flamingo Finance and Investment	1,96,836	0.55	1,96,836	0.55	0
	Company Limited					
4	Ramaniya Finance and	1,56,676	0.44	1,56,676	0.44	0
	Investment Company Limited	<u> </u>		<u> </u>		
5	Santon Finance and Investment	1,68,533	0.47	1,68,533	0.47	0
6	Company Limited Mahavir Spinning Mills Private	2 5 4 9	0.01	2 5 4 8	0.000	
0	Limited	3,548	0.01	3,548	0.009	(0.001)
7	S.P. Oswal	2,20,702	0.62	2,20,702	0.617	(0.003)
8	Shakun Oswal	51,191	0.14	51,191	0.14	(0.00)
9	Suchita Jain	90,267	0.25	90,267	0.25	0
10	Sachit Jain	45,04,742	12.62	48,03,570	_	0.81
10	Soumya Jain	45,04,742 2,660	0.01	2,660	13.43 0.007	(0.003)
11	Sagrika Jain	2,000	0.01	2,000	0.007	(0.003)
13	Eastern Trading Company	19,680	0.06	19,680	0.055	(0.005)
14	Amber Syndicate	28,748	0.08	28,748	0.08	(0.00)
15	Northern Trading Company	27,520	0.08	27,520	0.08	0
16	Paras Syndicate	30,515	0.09	30,515	0.09	0
17	Vardhman Holdings Limited	51,34,195	14.38	51,34,195	14.36	(0.02)
18	VTL Investments Limited	3,78,000	1.06	3,78,000	1.06	0
19	Vardhman Textiles Limited	97,08,333	27.20	97,08,333	27.15	(0.05)
20	Mahavir Shares Trust	5,32,911	, 1.49	5,32,911	1.49	0
	Total	2,34,72,653	65.755	2,37,71,481	66.48	0.725

(iii) Change in Promoter's Shareholding:

S. No	Name	Sharehold	ling	Date	Increase/ Decrease in shareholdin g	Reason	Cumulat Shareholding the year (01- 31-03-1	g during 04-18 to
		No. of shares at the beginning (01.04.18)/en d of the year (31.03.19)	% of total shares of the comp any				No. of Shares	% of total share s of the Comp any
1.	Eastern Trading Company	19,680 19,680	0.06 0.06	01-Apr-2018 31-Mar-2019	0	-	19,680	0.06
2.	Amber Syndicate	28,748 28,748	0.08	01-Apr-2018 31-Mar-2019	0		28,748	0.08
3.	Northern Trading Company	27,520 27,520	0.08 0.08	01-Apr-2018 31-Mar-2019	0	-	27,520	0.08
4.	Paras Syndicate	30,515 30,515	0.09	01-Apr-2018 31-Mar-2019	0	-	30,515	0.09
5.	Adishwar Enterprises LLP	0	0	01-Apr-2018 31-Mar-2019	0	-	0	0
6.	Flamingo Finance & Investment Company Limited	1,96,836 1,96,836	0.55 0.55	01-Apr-2018 31-Mar-2019	0	-	1,96,836	0.55
7.	Devakar Investment And Trading Company	22,15,016 22,15,016	6.20 6.20	01-Apr-2018 31-Mar-2019	0	-	22,15,016	6.20

	Private							
	Limited							
8.	Ramaniya	1,56,676	0.44	01-Apr-2018				
	Finance &				0	-	1,56,676	0.44
	Investment	1,56,676	0.44	31-Mar-2019				
	Company							
	Limited							
9.	Santon	1,68,533	0.47	01-Apr-2018				
	Finance &				0	-	1,68,533	0.47
	Investment	1,68,533	0.47	31-Mar-2019				
	Company							
	Limited							
10.	Mahavir	3,548	0.01	01-Apr-2018				
	Spinning Mills				0	-	3,548	0.01
	Private	3,548	0.01	31-Mar-2019				
	Limited							
11.	Shri Paul	2,20,702	0.62	01-Apr-2018				
	Oswal	2,20,702	0.62	31-Mar-2019	0	-	2,20,702	0.62
12.	Shakun Oswal	51,191	0.14	01-Apr-2018				
		51,191	0.14	31-Mar-2019	0	-	51,191	0.14
13.	Suchita Jain	90,267	0.25	01-Apr-2018				
		90,267	0.25	31-Mar-2019	0	-	90,267	0.25
14.	Sachit Jain	45,04,742	12.62	01-Apr-2018				
				04-May- 2018	8,218	Transfer	45,12,960	12.64
				07-May- 2018	5,000	Transfer	45,17,960	12.66
				08-May- 2018	5,000	Transfer	45,22,960	12.67
				11-May- 2018	5,000	Transfer	45,27,960	12.68
				16-May-2018	579	Transfer	45,28,539	12.69
				17-May-2018	5,000	Transfer	45,33,539	12.70
				21-May- 2018	5,473	Transfer	45,39,012	12.72
				24-May- 2018	5,000	Transfer	45,44,012	12.73
				25-May- 2018	5,335	Transfer	45,49,347	12.74
				05-June-2018	5,000	Transfer	45,54,347	12.76
				06-June-2018	5,000	Transfer	45,59,347	12.77

						-	-
			07-June-2018	1,384	Transfer	45,60,731	12.78
			08-June-2018	3,084	Transfer	45,63,815	12.78
			11-June-2018	3,215	Transfer	45,67,030	12.79
			12-June-2018	5,000	Transfer	45,72,030	12.81
			13-June-2018	5,000	Transfer	45,77,030	12.82
			14-June-2018	5,000	Transfer	45,82,030	12.84
			15-June-2018	3,086	Transfer	45,85,116	12.84
			18-June-2018	3,378	Transfer	45,88,494	12.85
			19-June-2018	5,000	Transfer	45,93,494	12.87
			20-June-2018	5,000	Transfer	45,98,494	12.88
			21-June-2018	5,012	Transfer	46,03,506	12.90
			22-June-2018	5,000	Transfer	46,08,506	12.91
			25-June-2018	5,000	Transfer	46,13,506	12.92
			27-June-2018	5,000	Transfer	46,18,506	12.94
			28-June-2018	5,000	Transfer	46,23,506	12.95
			29-June-2018	4,990	Transfer	46,28,496	12.97
			02-July-2018	5,000	Transfer	46,33,496	12.98
			03-July-2018	1,537	Transfer	46,35,033	12.98
			04-July-2018	5,000	Transfer	46,40,033	13.00
			05-July-2018	5,000	Transfer	46,45,033	13.01
			06-July-2018	4,802	Transfer	46,49,835	13.03
			10-July-2018	4,674	Transfer	46,54,509	13.04
			11-July-2018	2,892	Transfer	46,57,401	13.05
			12-July-2018	5,000	Transfer	46,62,401	13.06
			13-July-2018	5,000	Transfer	46,67,401	13.07
			16-July-2018	5,000	Transfer	46,72,401	13.09
			17-July-2018	5,000	Transfer	46,77,401	13.10
			18-July-2018	3,674	Transfer	46,81,075	13.11
			19-July-2018	5,000	Transfer	46,86,075	13.13
			24-Sep-2018	5,000	Transfer	46,91,075	13.14
			25-Sep-2018	10,000	Transfer	47,01,075	13.17
			26-Sep-2018	10,000	Transfer	47,11,075	13.20
			27-Sep-2018	5,204	Transfer	47,16,279	13.21
			28-Sep-2018	15,000	Transfer	47,31,279	13.25
			01-Oct-2018	10,000	Transfer	47,41,279	13.28
L	I	I	1	1	1	1	1

				03-Oct-2018	10,000	Transfer	47,51,279	13.31
				04-Oct-2018	10,000	Transfer	47,61,279	13.34
				05-Oct-2018	10,000	Transfer	47,71,279	13.37
				08-Oct-2018	10,000	Transfer	47,81,279	13.39
				09-Oct-2018	8,105	Transfer	47,89,384	13.42
				10-Oct-2018	10,000	Transfer	47,99,384	13.44
				11-Oct-2018	4,186	Transfer	48,03,570	13.46
		48,03,570	13.43	31-Mar-2019				
15.	Soumya Jain	2,660	0.01	01-Apr-2018				
		2,660	0.01	31-Mar-2019	0	-	2,660	0.01
16.	Sagrika Jain	2,580	0.01	01-Apr-2018				
		2,580	0.01	31-Mar-2019	0	-	2,580	0.01
17.	Vardhman	51,34,195	14.38	01-Apr-2018				
	Holdings				0	-	51,34,195	14.36
	Limited	51,34,195	14.36	31-Mar-2019				
18.	VTL	3,78,000	1.06	01-Apr-2018				
	Investments				0	-	3,78,000	1.06
	Limited	3,78,000	1.06	31-Mar-2019				
19.	Vardhman	97,08,333	27.20	01-Apr-2018				
	Textiles				0	-	97,08,333	27.15
	Limited	97,08,333	27.15	31-Mar-2019				
20.	Mahavir	5,32,911	1.49	01-Apr-2018				
	Shares Trust	5,32,911	1.49	31-Mar-2019	0	-	5,32,911	1.49

Note: Paid-up Share Capital was Rs.35,69,73,760 as on 31.03.2018 and Rs. 35,75,86,230 as on 31.03.2019.

(iv) Shareholding pattern of top ten shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):-

S.No.	Name	Shareho	olding	Date	Increase/ Decrease in shareholdin g	Reason		Shareholding the year
	Top Ten Shareholders	No. of Shares at beg (01.04.2018)/e nd (31.03.2019)	% of total shares of the Company				No. of shares	% of total shares of the Company
		17,86,000	5.00	01-April-18				
	DSP BLACKROCK			04-Jan-19	(17,86,000)	Transfer	0	
1.	SMALL CAP FUND			18-Jan-19	17,86,000	Transfer	17,86,000	5.00
		17,86,000	5.00	31-Mar-19				
	SUNDARAM	13,56,000	3.79	01-April-18				
	ALTERNATIVE			04-Jan-19	(13,56,000)	Transfer	0	о
2.	OPPORTUNITIES			18-Jan-19	13,56,000	Transfer	13,56,000	3.79
	FUND - NANO CAP	13,56,000	3.79	31-Mar-19				
	SERIES I							
		13,27,957	3.7	01-April-18				
3.	ANIL KUMAR GOEL	13,27,957	3.7	31-Mar-19	Ο	-	13,27,957	3.7
		5,00,000	1.40	01-April-18				
		27 7	·	' 04-Jan-19	(5,00,000)	Transfer	0	0
4.	MUKUL AGRAWAL			18-Jan-19	5,00,000	Transfer	5,00,000	1.40
		5,00,000	1.40	31-Mar-19	27 7			
	SUNDARAM	4,30,000	1.20	01-April-18				
	ALTERNATIVE			04-Jan-19	(4,30,000)	Transfer	0	0
5.	OPPORTUNITIES			18-Jan-19	4,30,000	Transfer	4,30,000	1.20
	FUND - NANO CAP	4,30,000	1.20	31-Mar-19				
	SERIES II							
		2,09,794	0.58	01-April-18				
				27-July-18	11	Transfer	2,09,805	0.58
6.	VANDANA SEHGAL			10-Aug-18	2,546	Transfer	2,12,351	0.59
				04-Jan-19	(1,03,194)	Transfer	1,09,157	0.31

				18-Jan-19	1,03,194	Transfer	2,12,351	0.59
				29-Mar-19	442	Transfer	2,12,793	0.59
		2,12,793	0.59	31-Mar-19				
		1,20,919	0.34	01-April-18				
				08-June-18	1,000	Transfer	1,21,919	0.34
7.				29-June-18	1,000	Transfer	1,22,919	0.34
				28-Sep-18	(1,000)	Transfer	1,21,919	0.34
				16-Nov-18	(4,010)	Transfer	1,17,909	0.33
	NEELAKANTAN			14-Dec-18	(1,000)	Transfer	1,16,909	0.33
	CHANDRASEKARA			21-Dec-18	(2,047)	Transfer	1,14,862	0.32
	N			28-Dec-18	(78)	Transfer	1,14,784	0.32
				04-Jan-19	(1,12,784)	Transfer	2,000	0
				18-Jan-19	1,12,784	Transfer	1,14,784	0.32
				08-Feb-19	1,000	Transfer	1,15,784	0.32
		1,15,784	0.32	31-Mar-19				
		0	0	01-April-18				
8.	NITIN KAPIL			29-Jun-18	43,500	Transfer	43,500	0.12
	TANDON			17-Aug-18	33,505	Transfer	77,005	0.22
				24-Aug-18	9,995	Transfer	87,000	0.24
				20-Sept-18	15,000	Transfer	1,02,000	0.29
				04-Jan-19	(1,02,000)	Transfer	0	0
				18-Jan-19	1,02,000	Transfer	1,02,000	0.29
		1,02,000	0.29	31-Mar-19				
		70,000	0.19	01-April-18				
9.	SEEMA GOEL				0	-	70,000	0.19
		70,000	0.19	31-Mar-19				
	PRANAV	53,401	0.15	01-April-18				
	KUMARPAL			04-Jan-19	(53,401)	Transfer	о	0
10.	PAREKH			18-Jan-19	53,401	Transfer	53,401	0.15
	PARENT	53,401	0.15	31-Mar-19				
		63,929	0.17	01-April-18				
11.	SAMEERA			16-Nov-18	(29,740)	Transfer	34,189	0.09
	RAJENDRAN			04-Jan-19	(34,189)	Transfer	0	о

				18-Jan-19	34,189	Transfer	34,189	0.09
		34,189	0.09	31-Mar-19				
		94,529	0.26	01-April-18				
12.	DOLLY KHANNA			04-May-18	(9,500)	Transfer	85,029	0.24
				11-May-18	(5,675)	Transfer	79,354	0.22
				25-May-18	(11,175)	Transfer	68,179	0.19
				01-Jun-18	(8,250)	Transfer	59,929	0.17
				08-Jun-18	(11,778)	Transfer	48,151	0.13
				15-Jun-18	(9,000)	Transfer	39,151	0.11
				22-Jun-18	(11,000)	Transfer	28,151	0.08
				29-Jun-18	(15,000)	Transfer	13,151	0.03
				06-July-18	(13,151)	Transfer	0	0
		0	о	31-Mar-19				

Note: Paid-up Share Capital was Rs.35,69,73,760 as on 31.03.2018 and Rs. 35,75,86,230 as on 31.03.2019.

v) Shareholding of Directors and Key Managerial Personnel:

S. No	Name	Shareholding		Date	Increase/ Decreas e in sharehol ding	Reason	Cumulat Shareholding the year (01-0 31-03-19	during 04-18 to
		No. of shares at the beginning (01.04.18)/e nd of the year (31.03.19)	% of total shares of the company				No. of Shares	% of total share s of the Comp any
A) [DIRECTORS:							
1.	Sachit Jain	45,04,742	12.62	01-Apr-2018				
	Vice-Chairman			04-May- 2018	8,218	Transfer	45,12,960	12.64
	& Managing			07-May- 2018	5,000	Transfer	45,17,960	12.66
	Director			08-May- 2018	5,000	Transfer	45,22,960	12.67
				11-May- 2018	5,000	Transfer	45,27,960	12.68
				16-May-2018	579	Transfer	45,28,539	12.69
				17-May-2018	5,000	Transfer	45,33,539	12.70
				21-May- 2018	5,473	Transfer	45,39,012	12.72

					1	1
		24-May- 2018	5,000	Transfer	45,44,012	12.73
		25-May- 2018	5,335	Transfer	45,49,347	12.74
		05-June-2018	5,000	Transfer	45,54,347	12.76
		06-June-2018	5,000	Transfer	45,59,347	12.77
		07-June-2018	1,384	Transfer	45,60,731	12.78
		08-June-2018	3,084	Transfer	45,63,815	12.78
		11-June-2018	3,215	Transfer	45,67,030	12.79
		12-June-2018	5,000	Transfer	45,72,030	12.81
		13-June-2018	5,000	Transfer	45,77,030	12.82
		14-June-2018	5,000	Transfer	45,82,030	12.84
		15-June-2018	3,086	Transfer	45,85,116	12.84
		18-June-2018	3,378	Transfer	45,88,494	12.85
		19-June-2018	5,000	Transfer	45,93,494	12.87
		20-June-2018	5,000	Transfer	45,98,494	12.88
		21-June-2018	5,012	Transfer	46,03,506	12.90
		22-June-2018	5,000	Transfer	46,08,506	12.91
		25-June-2018	5,000	Transfer	46,13,506	12.92
		27-June-2018	5,000	Transfer	46,18,506	12.94
		28-June-2018	5,000	Transfer	46,23,506	12.95
		29-June-2018	4,990	Transfer	46,28,496	12.97
		02-July-2018	5,000	Transfer	46,33,496	12.98
		03-July-2018	1,537	Transfer	46,35,033	12.98
		04-July-2018	5,000	Transfer	46,40,033	13.00
		05-July-2018	5,000	Transfer	46,45,033	13.01
		06-July-2018	4,802	Transfer	46,49,835	13.03
		10-July-2018	4,674	Transfer	46,54,509	13.04
		11-July-2018	2,892	Transfer	46,57,401	13.05
		12-July-2018	5,000	Transfer	46,62,401	13.06
1		13-July-2018	5,000	Transfer	46,67,401	13.07
		16-July-2018	5,000	Transfer	46,72,401	13.09
1		17-July-2018	5,000	Transfer	46,77,401	13.10
1		18-July-2018	3,674	Transfer	46,81,075	13.11
		19-July-2018	5,000	Transfer	46,86,075	13.13
		24-Sep-2018	5,000	Transfer	46,91,075	13.14
		25-Sep-2018	10,000	Transfer	47,01,075	13.17
L	1 1	I	1	1	I	1

				26-Sep-2018	10,000	Transfer	47,11,075	13.20
				27-Sep-2018	5,204	Transfer	47,16,279	13.21
				28-Sep-2018	15,000	Transfer	47,31,279	13.25
				01-Oct-2018	10,000	Transfer	47,41,279	13.28
				03-Oct-2018	10,000	Transfer	47,51,279	13.31
				04-Oct-2018	10,000	Transfer	47,61,279	13.34
				05-Oct-2018	10,000	Transfer	47,71,279	13.37
				08-Oct-2018	10,000	Transfer	47,81,279	13.39
				09-Oct-2018	8,105	Transfer	47,89,384	13.42
				10-Oct-2018	10,000	Transfer	47,99,384	13.44
		_		11-Oct-2018	4,186	Transfer	48,03,570	13.46
		48,03,570	13.43	31-Mar-2019				
2.	Suchita Jain	90,267	0.25	01-Apr-2018		Nil		
	Non-Executive				0	movement	90,267	0.25
	Director	90,267	0.25	31-Mar-2019		during the		
						year		
3.	Rajeev Gupta	0	0.00	01-Apr-2018	0	Nil Holding/		
	Independent					movement	0	0.00
	Director	0	0.00	31-Mar-2019		during the		
						year		
4.	Sanjeev Pahwa	0	0.00	01-Apr-2018		Nil Holding/		
	Independent				0	movement	0	0.00
	Director	0	0.00	31-Mar-2019		during the		
						year		
5.	Sanjoy	10	0.00	01-Apr-2018		Nil		
	Bhattacharyya					movement		
	Independent				0	during the	10	0.00
	Director	10	0.00	31-Mar-2019		year		
6.	Rakesh Jain	0	0.00	01-Apr-2018		Nil Holding/		
					0	movement	0	0.00
		0	0.00	31-Mar-2019		during the		
						year		
7.	Shubhra	0	0.00	01-Apr-2018		Nil Holding/		
	Bhattacharya					movement		
	Independent				0	during the	0	0.00

8. B.K. Choudhary 0 0.00 01-Apr-2018 Nil Holding/ movement noil Holding/ during the year 9. Rajinder Kumar 52,197 0.17 01-Apr-2018 Nil year 0 9. Rajinder Kumar 52,197 0.17 01-Apr-2018 Nil Nil 9. Rajinder Kumar 52,197 0.17 01-Apr-2018 Nil 52,197 Jain 52,197 0.17 31-Mar-2019 Morement 52,197 Director 52,197 0.17 31-Mar-2019 Muring the year 52,197 Non- Executive 52,197 0.17 31-Mar-2019 Muring the year 52,197 Non- Executive 52,197 0.17 31-Mar-2019 Transfer 8,425 B KEY MANAGERIAL PERSONNEL (KMP's): 19-Feb-2019 3,750 ESOP 12,175 1. Sanjeev Singla 6,500 0.041 31-Mar-2019 2,500 ESOP 14,675	0.00
Directoroo.oo31-Mar-2019during the year09.Rajinder Kumar52,1970.1701-Apr-2018NilJainJain00.1701-Apr-2018MovementNon- Executive52,1970.1731-Mar-2019during the yearDirector52,1970.1731-Mar-2019during the yearB)KEY MANAGERIAL PERSONNEL (KMP's):1.Sanjeev Singla6,5000.01801-Apr-20181.Sanjeev Singla6,5000.01801-Apr-20181,925Transfer8,4251.Sanjeev Singla6,50019-Feb-20193,750ESOP12,1751.Officer1119-Feb-20193,750ESOP12,1751.111111111.51111111.51111111.51111111.51111111.511111111.111111111.111111111.111111111.111111111.111<	
Director00.0031-Mar-2019during the year9.Rajinder Kumar52,1970.1701-Apr-2018Nil movement52,197JainJain071-Apr-20190movementNon- Executive Director52,1970.1731-Mar-2019during the yearB)KEY MANAGERIAL PERSONNEL (KMP's):1.Sanjeev Singla Chief Financial6,5000.01801-Apr-20181,925Transfer8,4251.Sanjeev Singla Officer6,5000.01801-Apr-20181,925Transfer8,4251.Sanjeev Singla 	
9. Rajinder Kumar 52,197 0.17 01-Apr-2018 Nil Jain Jain 0.17 01-Apr-2018 0 movement 52,197 Non- Executive 52,197 0.17 31-Mar-2019 0 during the year Director 52,197 0.17 31-Mar-2019 0 1 gear B) KEY MANAGERIAL PERSONNEL (KMP's): 2 1 Sanjeev Singla 6,500 0.018 01-Apr-2018 1 52,197 1. Sanjeev Singla 6,500 0.018 01-Apr-2018 1 52,197 1. Sanjeev Singla 6,500 0.018 01-Apr-2018 5 5 1. Sanjeev Singla 6,500 0.018 01-Apr-2018 5 1,925 Transfer 8,425 1. Officer 19-Feb-2019 3,750 ESOP 12,175 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1.	0.17
JainJa	0.17
Non- Executive 52,197 0.17 31-Mar-2019 during the year during the B) KEY MANAGERIAL PERSONNEL (KMP's): 23-Aug-2018 1. Sanjeev Singla 6,500 0.018 01-Apr-2018 Transfer 8,425 Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial 119-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial	0.17
DirectorDirectorDirectorDirectorDirectorDirectorB)KEY MANAGERIAL PERSONNEL (KMP's):1.Sanjeev Singla6,5000.01801-Apr-2018Image: Constraint of the second	0.17
B) KEY MANAGERIAL PERSONNEL (KMP's): 1. Sanjeev Singla 6,500 0.018 01-Apr-2018 Image: Constraint of the state of the	
1. Sanjeev Singla 6,500 0.018 01-Apr-2018 Image: Chief Financial Transfer 8,425 Chief Financial Officer 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 12,175 Image: Chief Financial Image: Chief Financial Image: Chief Financial Image: Chief Financial 19-Feb-2019 3,750 ESOP 14,675	
Chief Financial 23-Aug-2018 1,925 Transfer 8,425 Officer 19-Feb-2019 3,750 ESOP 12,175 27-Feb-2019 2,500 ESOP 14,675	_
Officer 19-Feb-2019 3,750 ESOP 12,175 27-Feb-2019 2,500 ESOP 14,675	
27-Feb-2019 2,500 ESOP 14,675	0.024
	0.034
14,675 0.041 31-Mar-2019	0.041
2. Sonam Taneja 500 0.001 01-Apr-2018	
Company o Nil movement 500	
Secretary 500 0.001 31-Mar-2019 during the year	0.001
	0.001

Note: Paid-up Share Capital was Rs.35,69,73,760 as on 31.03.2018 and Rs. 35,75,86,230 as on 31.03.2019.

(vi) Indebtedness:

Indebtedness of the Company including interest outstanding /accrued but not due for payment

				(Rs. In Lakhs)
PARTICULARS	Secured loans excluding deposits	Unsecured Ioans	Deposits	Total indebtedness
Indebtedness at the beginning of the financial year				
i) Principal amount	20,574.25	2,238.97	-	22,813.22
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but	45.13	_	_	45.13

not due Total (i+ii+iii)	31,888.24	1,500.00		33,388.24
iii) Interest accrued but	27.72	-	-	27.72
ii) Interest due but not paid	-	-	-	-
j) Principal amount	31,860.52	1500.00	-	33,360.52
Indebtedness at the end of the financial year				
	1,200.00	(730.97)		10,529.09
Net change	11,268.86	(738.97)		10,529.89
Reduction	449.86	738.97	-	1,188.83
Addition	11,718.72	-	-	11,718.72
the financial year				
indebtedness during				
Change in 2		, , , , , ,		, , , , , , , , , , , , , , , , , , , ,
Total (i+ii+iii)	20,619.38	2,238.97	-	22,858.35
not due				

(vii) Remuneration of Directors and Key Managerial Personnel:

A. Remuneration to Managing Director, Whole time Directors and /or Manager:

S. No	Particulars of Remuneration	Name of MD/WTD/Manager	Total Amount (In Rs.)	
1.	Gross Salary	Mr. Sachit Jain		
	a) Salary as per provisions	2,14,80,000	2,14,80,000	
	contained in section 17(1)			
	of the Income Tax Act,			
	1961			
	b) Value of perquisites u/s	12,271	17 771	
	17(2) Income-Tax Act,1961	12,271	12,271	
	c) Profits in lieu of salary	-	-	
	under section 17(3)			
	1961, Income –Tax Act			
2.	Stock option	-	-	
3.	Sweat Equity	-	-	
4.	Commission			
	 As % of profit 	29,27,368	29,27,368	
	 Others, specify 			
5.	Others, please Specify		-	
	- Retirement Benefits	14,38,992	14,38,992	
	Total (A)	2,58,58,631	2,58,58,631	
	Ceiling as per the Act	2,58,58,631	2,58,58,631	

B. Remuneration to other directors:

of Remunerati	Name of Directors						
Independent Directors	Rakesh Jain	Rajeev Gupta	Sanjeev Pahwa	Jayant Davar	Sanjoy Bhattacharyya	Shubhra Bhattacharya	
-Fee for attending board/ committee meetings -Commission -Others, please specify	Rs. 2,40,000/-	Rs. 2,40,000/-	Rs. 3,60,000/-	Rs. 40,000/-	Rs. 1,80,000/-	Rs. 40,000/-	Rs. 11,00,000/-
Other Non- Executive Directors	Rajinder Kumar Jain						- De
-Fee for attending board/comm ittee meetings -Commission -Others, Please specify	Rs. 2,80,000/-						Rs. 2,80,000/-
Total (1)	Rs.	Rs.	Rs.	Rs.	Rs. 1,80,000	Rs. 40,000	Rs. 11,00,000
Total (2)	Rs. 2,80,000	-	-	-	-	-	Rs. 2,80,000
Total (B) =(1+2) Total Managerial Remunerati	Rs. 5,20,000	Rs. 2,40,000	Rs. 3,60,000	Rs. 40,000	Rs. 1,80,000	Rs. 40,000	Rs. 13,80,000 Rs. 2,72,38,631
	on Independent Directors -Fee for attending board/ committee meetings -Commission -Others, please specify Other Non- Executive Directors -Fee for attending board/comm ittee meetings -Commission -Others, Please specify Total (1) Total (2) Total (B) =(1+2) Total	onRakeshIndependent DirectorsRakesh Jain-Fee for attending board/ committee meetings -Commission -Others, please specifyRs.Other Non- Executive DirectorsRajinder Kumar Jain-Fee for attending board/commi ittee meetings -Commission -Others, Please attending board/commi itteeRs. 2,80,000/- board/commi ittee meetings -Commission -Others, Please specifyRs. 2,80,000/- board/commi ittee meetings -Commission -Others, Please specifyRs. 2,40,000Total (1)Rs. 2,80,000Total (2)Rs. 2,80,000Total (B) =(1+2)S,20,000	onRakesh JainRajeev GuptaIndependent DirectorsRakesh JainRajeev Gupta-Fee for attending board/ committee meetingsRs. 2,40,000/-Rs. 2,40,000/-Commission -Others, please specifyOther Non- Executive DirectorsRajinder Kumar JainFee for attending board/comm ittee meetingsRs. 2,80,000/Fee for attending board/comm itteeRs. 2,80,000/Fee for attending board/comm itteeRs. 2,80,000/Fee for attending board/commRs. 2,80,000/Fee for attending board/commRs. 2,80,000/For board/commRs. 2,40,000-Total (1)Rs. 2,40,000-Total (2)Rs. 2,20,000-Total (B) e(1+2)Rs. 5,20,000-Total Managerial Remunerati	onIndependent DirectorsRakesh JainRajeev GuptaSanjeev Pahwa-Fee for attending board/ committee meetings -Commission -Others, please specifyRs. 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 3,60,000/- 0,014er, please specifyRs. 4 <td>onIndependent DirectorsRakesh JainRajeev GuptaSanjeev PahwaJayant Davar-Fee for attending board/ committee meetings -Commission -Others, please specifyRs. 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 3,60,000/- 3,60,000/- 3,60,000/-Rs. 40,000/- 40,000/- 3,60,000/-Other Non- Executive DirectorsRajinder Kumar JainImage: Commission Image: Commission Image: Commission 2,80,000/-Image: Commission Image: Commission Image: Commission Image: Commission 2,80,000/-Image: Commission Image: Commission Ima</br></td> <td>onNatureSanjevJayantSanjoyIndependent DirectorsRakesh JainRajeev GuptaSanjeev PahwaJayant DavarSanjoy Bhattacharyya-Fee for attending board/ committee meetings -Commission -Others, please specifyRs.Rs.Rs. 2,40,000/-Rs. 3,60,000/-Rs. 40,000/-Rs. 40,000/-Other Non- Executive DirectorsRajinder Kumar JainImage: Sanjeev 2,80,000/-Image: Sanjeev PahwaImage: Sanjeev PahwaImage: Sanjeev Pahwa-Fee for attending board/commi titee meetings -Commission -Others, Please specifyRs. 2,80,000/-Image: Sanjeev 2,80,000/-Image: Sanjeev PahwaImage: Sanjeev PahwaImage: Sanjeev Pahwa-Fee for attending board/commi titee meetings -Commission -Others, Please specifyRs. 2,80,000Rs. 2,40,000Rs. 3,60,000Image: Sanjeev PahwaImage: Sanjeev PahwaTotal (1)Rs. 2,40,000Rs. 2,40,000Rs. 3,60,000Rs. 40,000Image: Sanjeev PahwaImage: Sanjeev PahwaTotal (8) specifyRs. 3,20,000Rs. 2,40,000Rs. 3,60,000Rs. 40,000Image: Sanjeev PahwaTotal (9) specifyRs. 3,20,000Rs. 3,60,000Rs. 40,000Rs. 40,000Image: Sanjeev PahwaTotal (9) specifyRs. 3,20,000Rs. 3,60,000Rs. 3,60,000Rs. 40,000Rs. 40,000</td> <td>onIndependent DirectorsRakesh JainRajeev GuptaSanjeev PahwaJayant DavarSanjoy BhattacharyaShubhra Bhattacharya-Fee for attending Doard/ committee meetings -CommissionRs. 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 2,40,000/- 3,60,000/- 3,60,000/-Rs. 40,000/- 3,60,000/- 3,60,000/-Rs. 40,000/- 40,000/-Rs. 40,000/- 40,000/Commission -Others, please specifyRajinder Kumar JainRs. 40,000/- 40,000/-Rs. 40,000/- 40,000/-Rs. 40,000/Fee for attending board/comm ittee meetings -Commission -Others, Please specifyRs. 40,000/- 40,000/-Rs. 40,000/- 40,000Rs. 40,000-Fee for attending board/comm ittee remeetings -Commission -Others, Please specifyRs. 40,000/- 40,000Rs. 40,000Total (1) s, 2,80,000Rs. 2,40,000Rs. 2,40,000Rs. 3,60,000Rs. 40,000Rs. 40,000Total (8) e(t+2)Rs. 5,20,000Rs. 2,40,000Rs. 3,60,000Rs. 40,000Rs. 40,000Total (8) RemueratiRs. 5,20,000Rs. 4,0,000Rs. 4,0,000Rs. 40,000</td>	onIndependent DirectorsRakesh JainRajeev GuptaSanjeev 	onNatureSanjevJayantSanjoyIndependent DirectorsRakesh JainRajeev GuptaSanjeev PahwaJayant DavarSanjoy Bhattacharyya-Fee for attending board/ committee meetings -Commission -Others, please specifyRs.Rs.Rs. 2,40,000/-Rs. 3,60,000/-Rs. 40,000/-Rs. 40,000/-Other Non- Executive DirectorsRajinder Kumar JainImage: Sanjeev 2,80,000/-Image: Sanjeev PahwaImage: Sanjeev PahwaImage: Sanjeev Pahwa-Fee for attending board/commi titee meetings -Commission -Others, Please specifyRs. 2,80,000/-Image: Sanjeev 2,80,000/-Image: Sanjeev PahwaImage: Sanjeev PahwaImage: Sanjeev Pahwa-Fee for attending board/commi titee meetings -Commission -Others, Please specifyRs. 2,80,000Rs. 2,40,000Rs. 3,60,000Image: Sanjeev PahwaImage: Sanjeev PahwaTotal (1)Rs. 2,40,000Rs. 2,40,000Rs. 3,60,000Rs. 40,000Image: Sanjeev PahwaImage: Sanjeev PahwaTotal (8) specifyRs. 3,20,000Rs. 2,40,000Rs. 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3,60,000Rs. 40,000Rs. 40,000Total (8) RemueratiRs. 5,20,000Rs. 4,0,000Rs. 4,0,000Rs. 40,000

S. No	Particulars of remuneration	Key managerial Personnel					
		CEO	Company Secretary	CFO	Total		
			Ms. Sonam Taneja	Mr. Sanjeev Singla			
1.	Gross salary						
	a) Salary as per provisions contained in section 17(1) of the Income Tax Act,1961	N.A.	5,34,357	29,52,138	34,86,495		
	b) Value of perquisites u/s 17(2) Income Tax Act,1961		16	-	16		
2.	Stock Option		-	1,26,938	1,26,938		
3.	Sweat Equity		-	-	-		
4.	Commission - As % of profit - Others, specify		-	-	-		
5.	Others: - Provident Fund - LTA	-	15,664 6,530	1,34,280 -	1,49,944 6,530		
	Total		5,56,567	32,13,356	37,69,923		

C. Remuneration to key managerial personnel other than MD/Manager /WTD

vii) Penalties/punishment /compounding of offences:

Туре	Section of The Compa nies Act	Brief Description	Details of penalty/punishment/ compounding fees imposed	Authority (RD/NCLT/C OURT)	Appeal made, if any (give details)
			A. Company		
Penalty					
Punishment			/		
Compounding					
		ļ	B. Dire N.A.		
Penalty					
Punishment					
Compounding					
		C. Other	s officers in default		
Penalty					
Punishment					
Compounding					