

| General information about company  |                              |
|--|------------------------------|
| Scrip code   | 542376                       |
| NSE Symbol   |                              |
| MSEI Symbol  |                              |
| ISIN   | INE726X01014                 |
| Name of the company  | SPA Capital Services Limited |
| 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)                | 31-12-2021                   |
| Date of allotment / extinguishment (in case Capital Restructuring selected) / Listing Date |                              |
| Shareholding pattern filed under   | Regulation 31 (1) (b)        |
| Whether the listed entity is Public Sector Undertaking (PSU)?                              | No                           |

| Declaration |  |        |                             |                    |                          |
|-------------|--|--------|-----------------------------|--------------------|--------------------------|
| Sr. No.     | Particular   | Yes/No | Promoter and Promoter Group | Public shareholder | Non Promoter- Non Public |
| 1           | Whether the Listed Entity has issued any partly paid up shares?                        | No     | No                          | No                 | No                       |
| 2           | Whether the Listed Entity has issued any Convertible Securities ?                      | No     | No                          | No                 | No                       |
| 3           | Whether the Listed Entity has issued any Warrants ?                                    | No     | No                          | No                 | No                       |
| 4           | Whether the Listed Entity has any shares against which depository receipts are issued? | No     | No                          | No                 | No                       |
| 5           | Whether the Listed Entity has any shares in locked-in?                                 | Yes    | Yes                         | No                 | No                       |
| 6           | Whether any shares held by promoters are pledge or otherwise encumbered?               | No     | No                          |                    |                          |
| 7           | Whether company has equity shares with differential voting rights?                     | No     | No                          | No                 | No                       |
| 8           | Whether the listed entity has any significant beneficial owner?                        | Yes    |                             |                    |                          |

| Table I - Summary Statement holding of specified securities |                                 |                               |  |  |   |  |   |   |            |         |                         |
|---|---------------------------------|-------------------------------|--|--|---|--|---|---|------------|---------|-------------------------|
| Category<br>(I)   | Category of shareholder<br>(II) | Nos. Of shareholders<br>(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       | 10                            | 2113125                                      |  |   | 2113125  | 68.74   | 2113125   |            | 2113125 | 68.74                   |
| (B)   | Public                          | 275                           | 961100                                       |  |   | 961100   | 31.26   | 961100  |            | 961100  | 31.26                   |
| (C)   | Non Promoter-Non Public         |                               |  |  |   |  |   |   |            |         |                         |
| (C1)  | Shares underlying DRs           |                               |  |  |   |  |   |   |            |         |                         |
| (C2)  | Shares held by Employee Trusts  |                               |  |  |   |  |   |   |            |         |                         |
|   | Total                           | 285                           | 3074225                                      |  |   | 3074225  | 100   | 3074225   |            | 3074225 | 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      |   |  |  | 68.74   | 2090200                          | 98.92                           |   |                                 | 2113125   |
| (B)   | Public                         |   |  |  | 31.26   |                                  |                                 |   |                                 | 380820  |
| (C)   | Non Promoter-Non Public        |   |  |  |   |                                  |                                 |   |                                 |   |
| (C1)  | Shares underlying DRs          |   |  |  |   |                                  |                                 |   |                                 |   |
| (C2)  | Shares held by Employee Trusts |   |  |  |   |                                  |                                 |   |                                 |   |
|   | Total                          |   |  |  | 100   | 2090200                          | 67.99                           |   |                                 | 2493945   |

| 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  |                            |  |  |   |  |   |   |            |         |                                     |
| (a)  | Individuals/Hindu undivided Family  | 7                          | 870625                                       |  |   | 870625   | 28.32   | 870625  |            | 870625  | 28.32                               |
| (d)  | Any Other (specify)   | 3                          | 1242500                                      |  |   | 1242500  | 40.42   | 1242500   |            | 1242500 | 40.42                               |
| Sub-Total (A)(1)   |   | 10                         | 2113125                                      |  |   | 2113125  | 68.74   | 2113125   |            | 2113125 | 68.74                               |
| (2)  | Foreign   |                            |  |  |   |  |   |   |            |         |                                     |
| Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)                 |   | 10                         | 2113125                                      |  |   | 2113125  | 68.74   | 2113125   |            | 2113125 | 68.74                               |
| B  | Table III - Statement showing shareholding pattern of the Public shareholder                      |                            |  |  |   |  |   |   |            |         |                                     |
| (1)  | Institutions  |                            |  |  |   |  |   |   |            |         |                                     |
| ( 3 )  | Non-institutions  |                            |  |  |   |  |   |   |            |         |                                     |
| (a(ii))  | Individuals - i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.         | 269                        | 664230                                       |  |   | 664230   | 21.61   | 664230  |            | 664230  | 21.61                               |
| (a(ii))  | Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs. | 5                          | 209370                                       |  |   | 209370   | 6.81  | 209370  |            | 209370  | 6.81                                |
| (e)  | Any Other (specify)   | 1                          | 87500  |  |   | 87500  | 2.85  | 87500   |            | 87500   | 2.85                                |
| Sub-Total (B)(3)   |   | 275                        | 961100                                       |  |   | 961100   | 31.26   | 961100  |            | 961100  | 31.26                               |
| Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)                                   |   | 275                        | 961100                                       |  |   | 961100   | 31.26   | 961100  |            | 961100  | 31.26                               |
| C  | Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder     |                            |  |  |   |  |   |   |            |         |                                     |
| Total ( A+B+C2 )   |   | 285                        | 3074225                                      |  |   | 3074225  | 100   | 3074225   |            | 3074225 | 100                                 |
| Total (A+B+C )   |   | 285                        | 3074225                                      |  |   | 3074225  | 100   | 3074225   |            | 3074225 | 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  |  |  |  |                                  |                                 |   |                                 |   |
| (a)  |   |  |  | 28.32  | 847700                           | 97.37                           |   |                                 | 870625  |
| (d)  |   |  |  | 40.42  | 1242500                          | 100                             |   |                                 | 1242500   |
| Sub-Total (A) (1)  |   |  |  | 68.74  | 2090200                          | 98.92                           |   |                                 | 2113125   |
| (2)  | Foreign   |  |  |  |                                  |                                 |   |                                 |   |
| Total Shareholding of Promoter and Promoter Group (A)=(A) (1)+(A)(2)                 |   |  |  | 68.74  | 2090200                          | 98.92                           |   |                                 | 2113125   |
| B  | Table III - Statement showing shareholding pattern of the Public shareholder                  |  |  |  |                                  |                                 |   |                                 |   |
| (1)  | Institutions  |  |  |  |                                  |                                 |   |                                 |   |
| ( 3 )  | Non-institutions  |  |  |  |                                  |                                 |   |                                 |   |
| (a(ii))  |   |  |  | 21.61  |                                  |                                 |   |                                 | 113375  |
| (a(ii))  |   |  |  | 6.81   |                                  |                                 |   |                                 | 179945  |
| (e)  |   |  |  | 2.85   |                                  |                                 |   |                                 | 87500   |
| Sub-Total (B) (3)  |   |  |  | 31.26  |                                  |                                 |   |                                 | 380820  |
| Total Public Shareholding (B)=(B)(1)+(B)(2)+(B)(3)                                   |   |  |  | 31.26  |                                  |                                 |   |                                 | 380820  |
| C  | Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder |  |  |  |                                  |                                 |   |                                 |   |
| Total ( A+B+C2 )   |   |  |  | 100  | 2090200                          | 67.99                           |   |                                 | 2493945   |
| Total (A+B+C )   |   |  |  | 100  | 2090200                          | 67.99                           |   |                                 | 2493945   |

| Individuals/Hindu undivided Family  |                          |                      |                    |              |                |                   |                       |
|---|--------------------------|----------------------|--------------------|--------------|----------------|-------------------|-----------------------|
| Serial No.  | 1                        | 2                    | 3                  | 4            | 5              | 6                 | 7                     |
| Name of the Shareholders (I)  | KAMAL KISHORE SOMANI HUF | KAMAL KISHORE SOMANI | SANDEEP PARWAL HUF | HONEY PARWAL | SANDEEP PARWAL | LAXMI DEVI PARWAL | RAMESHWAR DASS PARWAL |
| PAN (II)  | AADHK2239N               | AAEPS6946H           | AAGHS5852N         | AAMPP3236D   | ACIPP0706G     | AECPP0053J        | AECPP0054R            |
| No. of fully paid up equity shares held (IV)  | 35000                    | 210175               | 122500             | 175000       | 275450         | 26250             | 26250                 |
| No. Of Partly paid-up equity shares held (V)  |                          |                      |                    |              |                |                   |                       |
| No. Of shares underlying Depository Receipts (VI)   |                          |                      |                    |              |                |                   |                       |
| Total nos. shares held (VII) = (IV)+ (V)+ (VI)  | 35000                    | 210175               | 122500             | 175000       | 275450         | 26250             | 26250                 |
| Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)   | 1.14                     | 6.84                 | 3.98               | 5.69         | 8.96           | 0.85              | 0.85                  |
| Number of Voting Rights held in each class of securities (IX)   |                          |                      |                    |              |                |                   |                       |
| Class eg:X  | 35000                    | 210175               | 122500             | 175000       | 275450         | 26250             | 26250                 |
| Class eg:y  |                          |                      |                    |              |                |                   |                       |
| Total   | 35000                    | 210175               | 122500             | 175000       | 275450         | 26250             | 26250                 |
| Total as a % of Total Voting rights   | 1.14                     | 6.84                 | 3.98               | 5.69         | 8.96           | 0.85              | 0.85                  |
| 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) +(Xi)(a) As a % of (A+B+C2) | 1.14                     | 6.84                 | 3.98               | 5.69         | 8.96           | 0.85              | 0.85                  |
| Number of Locked in shares (XII)  |                          |                      |                    |              |                |                   |                       |
| No. (a)   | 35000                    | 210175               | 122500             | 175000       | 252525         | 26250             | 26250                 |
| As a % of total Shares held (b)   | 100                      | 100                  | 100                | 100          | 91.68          | 100               | 100                   |
| 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)   | 35000                    | 210175               | 122500             | 175000       | 275450         | 26250             | 26250                 |
| Reason for not providing PAN  |                          |                      |                    |              |                |                   |                       |
| Reason for not providing PAN  |                          |                      |                    |              |                |                   |                       |
| Shareholder type  | Promoter                 | Promoter             | Promoter           | Promoter     | Promoter       | Promoter          | Promoter              |

| Individuals/Hindu undivided Family  |                                       |
|---|---------------------------------------|
| Serial No.  |                                       |
| Name of the Shareholders (I)  | <a href="#">Click here to go back</a> |
| PAN (II)  | Total                                 |
| No. of fully paid up equity shares held (IV)  | 870625                                |
| No. Of Partly paid-up equity shares held (V)  |                                       |
| No. Of shares underlying Depository Receipts (VI)   |                                       |
| Total nos. shares held (VII) = (IV)+ (V)+ (VI)  | 870625                                |
| Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)   | 28.32                                 |
| Number of Voting Rights held in each class of securities (IX)   |                                       |
| Class eg:X  | 870625                                |
| Class eg:y  |                                       |
| Total   | 870625                                |
| Total as a % of Total Voting rights   | 28.32                                 |
| 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) +(Xi)(a) As a % of (A+B+C2) | 28.32                                 |
| Number of Locked in shares (XII)  |                                       |
| No. (a)   | 847700                                |
| As a % of total Shares held (b)   | 97.37                                 |
| 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)   | 870625                                |
| Reason for not providing PAN  |                                       |
| Reason for not providing PAN  |                                       |
| Shareholder type  |                                       |



| Any Other (specify)   |                           |                             |                              |                                       |
|---|---------------------------|-----------------------------|------------------------------|---------------------------------------|
| Serial No.  | 1                         | 2                           | 3                            |                                       |
| Category  | Bodies Corporate          | Bodies Corporate            | Bodies Corporate             | <a href="#">Click here to go back</a> |
| Name of the Shareholders (I)  | DHRUBTARA TRADING PVT LTD | DEFIANT ENTERPRISES PVT LTD | VIJAY SHREE BUILDERS PVT LTD |                                       |
| PAN (II)  | AAACD0162D                | AAACD3397E                  | AAACV0036G                   | Total                                 |
| No. of the Shareholders (I)   | 1                         | 1                           | 1                            | 3                                     |
| No. of fully paid up equity shares held (IV)  | 586250                    | 568750                      | 87500                        | 1242500                               |
| No. Of Partly paid-up equity shares held (V)  |                           |                             |                              |                                       |
| No. Of shares underlying Depository Receipts (VI)   |                           |                             |                              |                                       |
| Total nos. shares held (VII) = (IV)+ (V)+ (VI)  | 586250                    | 568750                      | 87500                        | 1242500                               |
| Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)   | 19.07                     | 18.5                        | 2.85                         | 40.42                                 |
| Number of Voting Rights held in each class of securities (IX)   |                           |                             |                              |                                       |
| Class eg: X   | 586250                    | 568750                      | 87500                        | 1242500                               |
| Class eg:y  |                           |                             |                              |                                       |
| Total   | 586250                    | 568750                      | 87500                        | 1242500                               |
| Total as a % of Total Voting rights   | 19.07                     | 18.5                        | 2.85                         | 40.42                                 |
| 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) | 19.07                     | 18.5                        | 2.85                         | 40.42                                 |
| Number of Locked in shares (XII)  |                           |                             |                              |                                       |
| No. (a)   | 586250                    | 568750                      | 87500                        | 1242500                               |
| As a % of total Shares held (b)   | 100                       | 100                         | 100                          | 100                                   |
| 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)   | 586250                    | 568750                      | 87500                        | 1242500                               |
| Reason for not providing PAN  |                           |                             |                              |                                       |
| Reason for not providing PAN  |                           |                             |                              |                                       |
|   |                           |                             |                              |                                       |

|                  |                |                |                |  |
|------------------|----------------|----------------|----------------|--|
| Shareholder type | Promoter Group | Promoter Group | Promoter Group |  |
|------------------|----------------|----------------|----------------|--|

| Individuals - ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.   |                         |                  |                         |                 |              |                                       |
|---|-------------------------|------------------|-------------------------|-----------------|--------------|---------------------------------------|
| Serial No.  | 1                       | 2                | 3                       | 4               | 5            |                                       |
| Name of the Shareholders (I)  | SATISH KUMAR MAHESHWARI | SUNIL MAHESHWARI | ANITA SATISH MAHESHWARI | RAMANAND SHARMA | SANJU SHARMA | <a href="#">Click here to go back</a> |
| PAN (II)  | ACYPM9851H              | AGDPM6984E       | AHMPM4341B              | BIZPS2916P      | HQSPS6686H   | Total                                 |
| No. of fully paid up equity shares held (IV)  | 64750                   | 35175            | 36750                   | 41195           | 31500        | 209370                                |
| No. Of Partly paid-up equity shares held (V)  |                         |                  |                         |                 |              |                                       |
| No. Of shares underlying Depository Receipts (VI)   |                         |                  |                         |                 |              |                                       |
| Total nos. shares held (VII) = (IV)+ (V)+ (VI)  | 64750                   | 35175            | 36750                   | 41195           | 31500        | 209370                                |
| Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)   | 2.11                    | 1.14             | 1.2                     | 1.34            | 1.02         | 6.81                                  |
| Number of Voting Rights held in each class of securities (IX)   |                         |                  |                         |                 |              |                                       |
| Class eg: X   | 64750                   | 35175            | 36750                   | 41195           | 31500        | 209370                                |
| Class eg: y   |                         |                  |                         |                 |              |                                       |
| Total   | 64750                   | 35175            | 36750                   | 41195           | 31500        | 209370                                |
| Total as a % of Total Voting rights   | 2.11                    | 1.14             | 1.2                     | 1.34            | 1.02         | 6.81                                  |
| 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) | 2.11                    | 1.14             | 1.2                     | 1.34            | 1.02         | 6.81                                  |
| Number of Locked in shares (XII)  |                         |                  |                         |                 |              |                                       |
| No. (a)   |                         |                  |                         |                 |              |                                       |
| As a % of total Shares held (b)   |                         |                  |                         |                 |              |                                       |
| Number of equity shares held in dematerialized form (XIV)   | 64750                   | 35175            | 36750                   | 11770           | 31500        | 179945                                |
| Reason for not providing PAN  |                         |                  |                         |                 |              |                                       |
| Reason for not providing PAN  |                         |                  |                         |                 |              |                                       |

| Any Other (specify)   |  |                                       |
|---|--|---------------------------------------|
| Serial No.  | 1                                      |                                       |
| Category  | Bodies Corporate                       |                                       |
| Category / More than 1 percentage   | More than 1 percentage of shareholding |                                       |
| Name of the Shareholders (I)  | ZEALOUS FINANCIAL SERVICES PVT LTD     | <a href="#">Click here to go back</a> |
| PAN (II)  | AAACZ0057F                             | Total                                 |
| No. of the Shareholders (I)   | 1                                      | 0                                     |
| No. of fully paid up equity shares held (IV)  | 87500                                  | 0                                     |
| No. Of Partly paid-up equity shares held (V)  |  |                                       |
| No. Of shares underlying Depository Receipts (VI)   |  |                                       |
| Total nos. shares held (VII) = (IV)+ (V)+ (VI)  | 87500                                  | 0                                     |
| Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)   | 2.85                                   | 0                                     |
| Number of Voting Rights held in each class of securities (IX)   |  |                                       |
| Class eg: X   | 87500                                  | 0                                     |
| Class eg:y  |  |                                       |
| Total   | 87500                                  | 0                                     |
| Total as a % of Total Voting rights   | 2.85                                   | 0                                     |
| 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) | 2.85                                   | 0                                     |
| Number of Locked in shares (XII)  |  |                                       |
| No. (a)   |  |                                       |
| As a % of total Shares held (b)   |  |                                       |
| Number of equity shares held in dematerialized form (XIV)   | 87500                                  | 0                                     |
| Reason for not providing PAN  |  |                                       |
| Reason for not providing PAN  |  |                                       |

## significant beneficial owners

| s of the SBO |            |  |             |   | Details of the registered owner     |            |  |             |   | Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect* |               |  |                     |                                   |
|--------------|------------|--|-------------|---|-------------------------------------|------------|--|-------------|---|--|---------------|--|---------------------|-----------------------------------|
|              | PAN        | Passport No. in case of a foreign national | Nationality | Nationality (Applicable in case of Any other is selected) | Name                                | PAN        | Passport No. in case of a foreign national | Nationality | Nationality (Applicable in case of Any other is selected) | Whether by virtue of:  |               |  |                     |                                   |
|              |            |  |             |   |                                     |            |  |             |   | Shares   | Voting rights | Rights on distributable dividend or any other distribution | Exercise of control | Exercise of significant influence |
| ep il        | ACIPP0706G |  | India       |   | Sandeep Parwal                      | ACIPP0706G |  | India       |   | 8.96   | 8.96          |  | No                  | No                                |
| ep il        | ACIPP0706G |  | India       |   | Sandeep Parwal HUF                  | AAGHS5852N |  | India       |   | 3.98   | 3.98          |  | No                  | No                                |
| ep il        | ACIPP0706G |  | India       |   | Vijayshree Builders Private Limited | AAACV0036G |  | India       |   | 1.19   | 1.19          |  | No                  | No                                |
| ep il        | ACIPP0706G |  | India       |   | Dhrubtara Trading Private Limited   | AAACD0162D |  | India       |   | 4.22   | 4.22          |  | No                  | No                                |
| ep il        | ACIPP0706G |  | India       |   | Defiant Enterprises Private Limited | AAACD3397E |  | India       |   | 3.77   | 3.77          |  | No                  | No                                |
| Total:       |            |  |             |   |                                     |            |  |             |   | 22.12  | 22.12         | 0  |                     |                                   |
| y il         | AAMPP3236D |  | India       |   | Honey Parwal                        | AAMPP3236D |  | India       |   | 5.69   | 5.69          |  | No                  | No                                |
| y il         | AAMPP3236D |  | India       |   | Vijayshree Builders Private Limited | AAACV0036G |  | India       |   | 1.2  | 1.2           |  | No                  | No                                |
| y il         | AAMPP3236D |  | India       |   | Dhrubtara Trading Private Limited   | AAACD0162D |  | India       |   | 2.66   | 2.66          |  | No                  | No                                |
| y il         | AAMPP3236D |  | India       |   | Defiant Enterprises Private Limited | AAACD3397E |  | India       |   | 2.3  | 2.3           |  | No                  | No                                |
| Total:       |            |  |             |   |                                     |            |  |             |   | 11.85  | 11.85         | 0  |                     |                                   |
| shwar il     | AECPP0054R |  | India       |   | Rameshwar Dass Parwal               | AECPP0054R |  | India       |   | 0.85   | 0.85          |  | No                  | No                                |
| shwar il     | AECPP0054R |  | India       |   | Dhrubtara Trading Private Limited   | AAACD0162D |  | India       |   | 3.71   | 3.71          |  | No                  | No                                |
| shwar il     | AECPP0054R |  | India       |   | Defiant Enterprises Private Limited | AAACD3397E |  | India       |   | 1  | 1             |  | No                  | No                                |
| Total:       |            |  |             |   |                                     |            |  |             |   | 5.56   | 5.56          | 0  |                     |                                   |
| i il         | AECPP0053J |  | India       |   | Laxmi Devi Parwal                   | AECPP0053J |  | India       |   | 0.85   | 0.85          |  | No                  | No                                |
| i il         | AECPP0053J |  | India       |   | Dhrubtara Trading Private Limited   | AAACD0162D |  | India       |   | 1.55   | 1.55          |  | No                  | No                                |
| i il         | AECPP0053J |  | India       |   | Defiant Enterprises Private Limited | AAACD3397E |  | India       |   | 3.16   | 3.16          |  | No                  | No                                |
| Total:       |            |  |             |   |                                     |            |  |             |   | 5.56   | 5.56          | 0  |                     |                                   |