

FORM NO. MGT 9
EXTRACT OF ANNUAL RETURN

As on financial year ended on 31.03.2019

Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1)
of the Company (Management & Administration) Rules, 2014.

1. REGISTRATION & OTHER DETAILS:-

1	CIN	L24139HR1988PLC030300
2	Registration Date	22.06.1988
3	Name of the Company	Vikas WSP Limited
4	Category/Sub-category of the Company	Company Limited by Shares
5	Address of the Registered office	Railway Road, Siwani, Haryana -127046
6	Address of the Corporate Office & contact details	B-86/87,RIICO, Udyog Vihar, Industrial Area, Sri Ganga Nagar-335002
7	Whether listed Company	Yes, Bombay Stock Exchange
8	Name, Address & contact details of the Registrar & Transfer Agent, if any.	Link Intime India Pvt. Limited Address: - 44, Community Centre, 2 nd Floor, Near PVR Naraina, Phase-I, Naraina Industrial Area, New Delhi - 110028 TEL. NO. 011-41410592

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	Guar Polymers	13023230, 13023220	100%

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
1	Not applicable				

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

Category-wise Share Holding

S. No	Category of Shareholders	Shareholding at the beginning of the year - 2018				Shareholding at the end of the year - 2019				% Change during the year
		Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
(A)	Shareholding of Promoter and Promoter Group									
[1]	Indian									
(a)	Individuals / Hindu Undivided Family	37943681	0	37943681	'19.5144	36507164	0	36507164	'17.8572	'-1.6572
(b)	Central Government / State Government (s)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(c)	Financial Institutions / Banks	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(d)	Any Other (Specify)									
	Sub Total (A)(1)	37943681	0	37943681	'19.5144	36507164	0	36507164	'17.8572	'-1.6572
[2]	Foreign									
(a)	Individuals (Non-Resident Individuals / Foreign Individuals)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(b)	Government	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(c)	Institutions	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(d)	Foreign Portfolio Investor	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(e)	Any Other (Specify)									
	Sub Total (A)(2)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
	Total Shareholding of Promoter and Promoter Group(A)=(A)(1)+(A)(2)	37943681	0	37943681	'19.5144	36507164	0	36507164	'17.8572	'-1.6572
(B)	Public Shareholding									
[1]	Institutions									
(a)	Mutual Funds / UTI	0	0	0	'0.0000	0	10000	10000	'0.0049	'0.0049
(b)	Venture Capital Funds	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(c)	Alternate Investment Funds	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(d)	Foreign Venture Capital Investors	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(e)	Foreign Portfolio Investor	1000	0	1000	'0.0005	1000	0	1000	'0.0005	'0.0000
(f)	Financial Institutions / Banks	852538	0	852538	'0.4385	852538	0	852538	'0.4170	'-0.0215
(g)	Insurance Companies	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(h)	Provident Funds/ Pension Funds	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(i)	Any Other (Specify)									
	Sub Total (B)(1)	853538	0	853538	'0.4390	853538	10000	863538	'0.4224	'-0.0166

S. No	Category of Shareholders	Shareholding at the beginning of the year - 2018				Shareholding at the end of the year - 2019				% Change during the year
		Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
[2]	Central Government/ State Government(s)/ President of India									
	Sub Total (B)(2)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
[3]	Non-Institutions									
(a)	Individuals									
(i)	Individual shareholders holding nominal share capital upto Rs. 1 lakh.	69713587	2266082	71979669	'37.0190	40239083	8919982	49159065	'24.0458	'-12.9732
(ii)	Individual shareholders holding nominal share capital in excess of Rs. 1 lakh	63756434	0	63756434	'32.7898	8428295	94879918	103308213	'50.5324	'17.7426
(b)	NBFCs registered with RBI	0	0	0	'0.0000	8175	0	8175	'0.0040	'0.0040
(d)	Overseas Depositories(holding DRs) (balancing figure)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
(e)	Any Other (Specify)									
	Trusts	50700	0	50700	'0.0261	50400	4000	54400	'0.0266	'0.0005
	Foreign Nationals	2000	0	2000	'0.0010	0	0	0	'0.0000	'-0.0010
	Hindu Undivided Family	6394547	0	6394547	'3.2887	3503671	0	3503671	'1.7138	'-1.5749
	Non Resident Indians (Non Repat)	745453	0	745453	'0.3834	444843	0	444843	'0.2176	'-0.1658
	Non Resident Indians (Repat)	2457063	0	2457063	'1.2637	816508	0	816508	'0.3994	'-0.8643
	Overseas Bodies Corporates	57000	0	57000	'0.0293	55000	0	55000	'0.0269	'-0.0024
	Clearing Member	1428655	0	1428655	'0.7348	825212	0	825212	'0.4036	'-0.3312
	Bodies Corporate	8770860	0	8770860	'4.5108	8893811	0	8893811	'4.3503	'-0.1605
	Sub Total (B)(3)	153376299	2266082	155642381	'80.0466	63264998	103803900	167068898	'81.7204	'1.6738
	Total Public Shareholding(B)=(B)(1)+(B)(2)+(B)(3)	154229837	2266082	156495919	'80.4856	64118536	103813900	167932436	'82.1428	'1.6572
	Total (A)+(B)	192173518	2266082	194439600	'100.0000	100625700	103813900	204439600	'100.0000	'0.0000
(C)	Non Promoter - Non Public									
[1]	Custodian/DR Holder	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
[2]	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)	0	0	0	'0.0000	0	0	0	'0.0000	'0.0000
	Total (A)+(B)+(C)	192173518	2266082	194439600	'100.0000	100625700	103813900	204439600	'100.0000	

B) Shareholding of Promoter-

S. No	Shareholder's Name	Shareholding at the beginning of the year - 2018			Shareholding at the end of the year - 2019			
		Number of Shares held	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	Number of Shares held	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	% change in shareholding during the year
1	Bajrang Dass Aggarwal	23732332	'12.2055	'8.7106	23727332	'11.6060	'8.2845	'-0.5995
2	Bimla Devi Jindal	12774832	'6.5701	'0.0000	12774832	'6.2487	'0.0000	'-0.3214
3	Megh Raj	1436517	'0.7388	'0.0000	0	'0.0000	'0.0000	'-0.7388
4	Kamini Jindal	0	'0.0000	'0.0000	5000	'0.0024	'0.0000	'0.0024
	Total	37943681	'19.5144	'8.2845	36507164	'17.8572	'8.2845	'-1.6572

C) Change in Promoters' Shareholding (please specify, if there is no change)

Sr No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
1	BAJRANG DASS AGGARWAL	23732332	11.6085			23732332	11.6085
	Transfer			16 Nov 2018	(3505000)	20227332	9.8940
	Transfer			07 Dec 2018	(3290432)	16936900	8.2845
	Transfer			31 Dec 2018	6790432	23727332	11.6060
	Transfer			25 Jan 2019	(6790432)	16936900	8.2845
	Transfer			29 Mar 2019	6790432	23727332	11.6060
	AT THE END OF THE YEAR					23727332	11.6060
2	BIMLA DEVI JINDAL	12774832	6.2487			12774832	6.2487
	AT THE END OF THE YEAR					12774832	6.2487
3	KAMINI JINDAL	0	0.0000			0	0.0000
	Transfer			16 Nov 2018	5000	5000	0.0024
	AT THE END OF THE YEAR					5000	0.0024
4	MEGH RAJ	1436517	0.7027			1436517	0.7027
	Transfer			18 May 2018	(500000)	936517	0.4581
	Transfer			25 May 2018	(936517)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000

Note:

1. Paid up Share Capital of the Company (Face Value Rs. 1.00) at the end of the year is 204439600 Shares.
2. The details of holding have been clubbed based on PAN.
3. % of total Shares of the Company is based on the paid up Capital of the Company at the end of the Year.

SR NO	SHAREHOLDER NAME	DPID/Folio	PAN	SHARES	BENPOS_DATE
1	Bimla Devi Jindal	IN30094010051152	ABSPJ6495R	12774832	31/03/2018
2	Bimla Devi Jindal	IN30094010051152	ABSPJ6495R	12774832	31/03/2019
3	Bajrang Dass Aggarwal	IN30133019413414	ACHPJ9024A	23732332	31/03/2018
4	Bajrang Dass Aggarwal	IN30133019413414	ACHPJ9024A	23727332	31/03/2019
5	Megh Raj	IN30133019413422	ACNPR1540B	1436517	31/03/2018
6.	Megh Raj	IN30133019413422	ACNPR1540B	0.00	31/03/2019
7.	Kamini Jindal	IN30133021799814	AMIPJ8101H	0.00	31/03/2018
8.	Kamini Jindal	IN30133021799814	AMIPJ8101H	5000	31/03/2019

D) Shareholding Pattern of top ten Shareholders:

(Other than Directors, Promoters and Holders of GDRs and ADRs):

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
	Name & Type of Transaction	NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
1	VANDANA SECURITIES PVT LTD	1882235	0.9207			1882235	0.9207
	AT THE END OF THE YEAR					1882235	0.9207
2	SHRI PARASRAM HOLDINGS PVT.LTD.	425258	0.2080			425258	0.2080
	Transfer			06 Apr 2018	(16650)	408608	0.1999
	Transfer			13 Apr 2018	7500	416108	0.2035
	Transfer			20 Apr 2018	(16000)	400108	0.1957
	Transfer			27 Apr 2018	(137661)	262447	0.1284
	Transfer			04 May 2018	(43781)	218666	0.1070
	Transfer			11 May 2018	1487	220153	0.1077
	Transfer			18 May 2018	2625	222778	0.1090
	Transfer			25 May 2018	(2400)	220378	0.1078
	Transfer			01 Jun 2018	(9132)	211246	0.1033
	Transfer			08 Jun 2018	(4851)	206395	0.1010
	Transfer			15 Jun 2018	(1312)	205083	0.1003
	Transfer			22 Jun 2018	12250	217333	0.1063
	Transfer			30 Jun 2018	57294	274627	0.1343
	Transfer			06 Jul 2018	(3223)	271404	0.1328
	Transfer			13 Jul 2018	(32585)	238819	0.1168
	Transfer			20 Jul 2018	57230	296049	0.1448
	Transfer			27 Jul 2018	(18800)	277249	0.1356
	Transfer			03 Aug 2018	(48713)	228536	0.1118
	Transfer			10 Aug 2018	3111	231647	0.1133
	Transfer			17 Aug 2018	(32522)	199125	0.0974
	Transfer			24 Aug 2018	(8939)	190186	0.0930
	Transfer			31 Aug 2018	1000	191186	0.0935
	Transfer			07 Sep 2018	27376	218562	0.1069
	Transfer			14 Sep 2018	(47472)	171090	0.0837

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
	Transfer			21 Sep 2018	47690	218780	0.1070
	Transfer			29 Sep 2018	(7219)	211561	0.1035
	Transfer			05 Oct 2018	(2571)	208990	0.1022
	Transfer			12 Oct 2018	3529	212519	0.1040
	Transfer			19 Oct 2018	51520	264039	0.1292
	Transfer			26 Oct 2018	11448	275487	0.1348
	Transfer			02 Nov 2018	14161	289648	0.1417
	Transfer			09 Nov 2018	304979	594627	0.2909
	Transfer			16 Nov 2018	9699	604326	0.2956
	Transfer			23 Nov 2018	199220	803546	0.3930
	Transfer			30 Nov 2018	(3640)	799906	0.3913
	Transfer			07 Dec 2018	16449	816355	0.3993
	Transfer			14 Dec 2018	(46440)	769915	0.3766
	Transfer			21 Dec 2018	12900	782815	0.3829
	Transfer			28 Dec 2018	(2252)	780563	0.3818
	Transfer			31 Dec 2018	(12600)	767963	0.3756
	Transfer			04 Jan 2019	19600	787563	0.3852
	Transfer			11 Jan 2019	(62007)	725556	0.3549
	Transfer			18 Jan 2019	26350	751906	0.3678
	Transfer			25 Jan 2019	(1800)	750106	0.3669
	Transfer			01 Feb 2019	24002	774108	0.3786
	Transfer			08 Feb 2019	50147	824255	0.4032
	Transfer			15 Feb 2019	(41460)	782795	0.3829
	Transfer			22 Feb 2019	4541	787336	0.3851
	Transfer			01 Mar 2019	(111830)	675506	0.3304
	Transfer			08 Mar 2019	(18332)	657174	0.3215
	Transfer			15 Mar 2019	663	657837	0.3218
	Transfer			22 Mar 2019	243625	901462	0.4409
	Transfer			29 Mar 2019	97681	999143	0.4887
	Transfer			30 Mar 2019	(250)	998893	0.4886
	AT THE END OF THE YEAR					998893	0.4886
3	MASTER CAPITAL SERVICES LTD	149984	0.0734			149984	0.0734
	Transfer			06 Apr 2018	25805	175789	0.0860
	Transfer			13 Apr 2018	(18528)	157261	0.0769
	Transfer			20 Apr 2018	(8950)	148311	0.0725
	Transfer			27 Apr 2018	6130	154441	0.0755
	Transfer			04 May 2018	(14447)	139994	0.0685
	Transfer			11 May 2018	1938	141932	0.0694
	Transfer			18 May 2018	(6468)	135464	0.0663
	Transfer			25 May 2018	(750)	134714	0.0659
	Transfer			01 Jun 2018	10601	145315	0.0711
	Transfer			08 Jun 2018	19604	164919	0.0807

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
	Transfer			15 Jun 2018	(17001)	147918	0.0724
	Transfer			30 Jun 2018	1398	135987	0.0665
	Transfer			06 Jul 2018	8381	144368	0.0706
	Transfer			13 Jul 2018	(20301)	124067	0.0607
	Transfer			20 Jul 2018	1871	125938	0.0616
	Transfer			27 Jul 2018	(3655)	122283	0.0598
	Transfer			03 Aug 2018	3759	126042	0.0617
	Transfer			10 Aug 2018	948	126990	0.0621
	Transfer			17 Aug 2018	(17800)	109190	0.0534
	Transfer			24 Aug 2018	7982	117172	0.0573
	Transfer			31 Aug 2018	(3639)	113533	0.0555
	Transfer			07 Sep 2018	2850	116383	0.0569
	Transfer			14 Sep 2018	(13321)	103062	0.0504
	Transfer			21 Sep 2018	3274	106336	0.0520
	Transfer			29 Sep 2018	27552	133888	0.0655
	Transfer			05 Oct 2018	23308	157196	0.0769
	Transfer			12 Oct 2018	9909	167105	0.0817
	Transfer			19 Oct 2018	(29491)	137614	0.0673
	Transfer			26 Oct 2018	26311	163925	0.0802
	Transfer			02 Nov 2018	18785	182710	0.0894
	Transfer			09 Nov 2018	9378	192088	0.0940
	Transfer			16 Nov 2018	26820	218908	0.1071
	Transfer			23 Nov 2018	(3896)	215012	0.1052
	Transfer			30 Nov 2018	28904	243916	0.1193
	Transfer			07 Dec 2018	48488	292404	0.1430
	Transfer			14 Dec 2018	73935	366339	0.1792
	Transfer			21 Dec 2018	(23834)	342505	0.1675
	Transfer			28 Dec 2018	4449	346954	0.1697
	Transfer			31 Dec 2018	9299	356253	0.1743
	Transfer			04 Jan 2019	(4351)	351902	0.1721
	Transfer			11 Jan 2019	31490	383392	0.1875
	Transfer			18 Jan 2019	2034	385426	0.1885
	Transfer			25 Jan 2019	82	385508	0.1886
	Transfer			01 Feb 2019	119549	505057	0.2470
	Transfer			08 Feb 2019	54512	559569	0.2737
	Transfer			15 Feb 2019	(8483)	551086	0.2696
	Transfer			22 Feb 2019	(50308)	500778	0.2450
	Transfer			01 Mar 2019	(35045)	465733	0.2278
	Transfer			08 Mar 2019	(15043)	450690	0.2205
	Transfer			15 Mar 2019	(10181)	440509	0.2155
	Transfer			22 Mar 2019	34558	475067	0.2324
	Transfer			29 Mar 2019	430200	905267	0.4428
	AT THE END OF THE YEAR					905267	0.4428

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
	Name & Type of Transaction	NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
4	PURSHOTTAM GANESH GOKHALE	425240	0.2080			425240	0.2080
	Transfer			17 Aug 2018	100000	636240	0.3112
	AT THE END OF THE YEAR					636240	0.3112
5	UNITED INDIA INSURANCE COMPANY LIMITED	593100	0.2901			593100	0.2901
	AT THE END OF THE YEAR					593100	0.2901
6	GIAT NANDAN JAIN	164564	0.0805			164564	0.0805
	Transfer			06 Jul 2018	195616	360180	0.1762
	Transfer			19 Oct 2018	(140000)	220180	0.1077
	Transfer			15 Feb 2019	70000	290180	0.1419
	Transfer			22 Feb 2019	(70000)	220180	0.1077
	Transfer			29 Mar 2019	340000	560180	0.2740
	AT THE END OF THE YEAR					560180	0.2740
7	ISH PUNYANI	555555	0.2717			555555	0.2717
	Transfer			06 Apr 2018	36000	591555	0.2894
	Transfer			13 Apr 2018	(36000)	555555	0.2717
	Transfer			06 Jul 2018	73500	629055	0.3077
	Transfer			13 Jul 2018	(43500)	585555	0.2864
	Transfer			20 Jul 2018	23000	608555	0.2977
	Transfer			03 Aug 2018	13000	621555	0.3040
	Transfer			17 Aug 2018	(500)	621055	0.3038
	Transfer			31 Aug 2018	500	621555	0.3040
	Transfer			14 Sep 2018	31000	652555	0.3192
	Transfer			21 Sep 2018	(47000)	605555	0.2962
	Transfer			05 Oct 2018	10000	615555	0.3011
	Transfer			19 Oct 2018	9000	624555	0.3055
	Transfer			26 Oct 2018	(9000)	615555	0.3011
	Transfer			23 Nov 2018	(6655)	608900	0.2978
	Transfer			07 Dec 2018	3655	612555	0.2996
	Transfer			14 Dec 2018	(12000)	600555	0.2938
	Transfer			04 Jan 2019	54000	654555	0.3202
	Transfer			11 Jan 2019	(45000)	609555	0.2982
	Transfer			01 Mar 2019	(54000)	555555	0.2717
	AT THE END OF THE YEAR					555555	0.2717

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
	Name & Type of Transaction	NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
8	ANCHI DEVI JINDAL	514000	0.2514			514000	0.2514
	AT THE END OF THE YEAR					514000	0.2514
9	SHAREKHAN LIMITED	199421	0.0975			199421	0.0975
	Transfer			06 Apr 2018	(16553)	182868	0.0894
	Transfer			13 Apr 2018	3312	186180	0.0911
	Transfer			20 Apr 2018	14587	200767	0.0982
	Transfer			27 Apr 2018	9982	210749	0.1031
	Transfer			04 May 2018	13665	224414	0.1098
	Transfer			11 May 2018	(18879)	205535	0.1005
	Transfer			18 May 2018	(14842)	190693	0.0933
	Transfer			25 May 2018	(3539)	187154	0.0915
	Transfer			01 Jun 2018	(298)	186856	0.0914
	Transfer			08 Jun 2018	645	187501	0.0917
	Transfer			15 Jun 2018	(11221)	176280	0.0862
	Transfer			22 Jun 2018	452	176732	0.0864
	Transfer			30 Jun 2018	28108	204840	0.1002
	Transfer			06 Jul 2018	(29246)	175594	0.0859
	Transfer			13 Jul 2018	120244	295838	0.1447
	Transfer			20 Jul 2018	(95024)	200814	0.0982
	Transfer			27 Jul 2018	(13795)	187019	0.0915
	Transfer			03 Aug 2018	(4890)	182129	0.0891
	Transfer			10 Aug 2018	3910	186039	0.0910
	Transfer			17 Aug 2018	14250	200289	0.0980
	Transfer			24 Aug 2018	29896	230185	0.1126
	Transfer			31 Aug 2018	(12893)	217292	0.1063
	Transfer			07 Sep 2018	(35495)	181797	0.0889
	Transfer			14 Sep 2018	2062	183859	0.0899
	Transfer			21 Sep 2018	18110	201969	0.0988
	Transfer			29 Sep 2018	(9099)	192870	0.0943
	Transfer			05 Oct 2018	3389	196259	0.0960
	Transfer			12 Oct 2018	(15392)	180867	0.0885
	Transfer			19 Oct 2018	(5302)	175565	0.0859
	Transfer			26 Oct 2018	2017	177582	0.0869
	Transfer			02 Nov 2018	25095	202677	0.0991
	Transfer			09 Nov 2018	(35330)	167347	0.0819
	Transfer			16 Nov 2018	(2390)	164957	0.0807
	Transfer			23 Nov 2018	2820	167777	0.0821
	Transfer			30 Nov 2018	(1271)	166506	0.0814
	Transfer			07 Dec 2018	2129	168635	0.0825
	Transfer			14 Dec 2018	17343	185978	0.0910
	Transfer			21 Dec 2018	(19697)	166281	0.0813
	Transfer			28 Dec 2018	4945	171226	0.0838
	Transfer			31 Dec 2018	2195	173421	0.0848

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
		NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
	Transfer			04 Jan 2019	(10207)	163214	0.0798
	Transfer			11 Jan 2019	(12971)	150243	0.0735
	Transfer			18 Jan 2019	3272	153515	0.0751
	Transfer			25 Jan 2019	2315	155830	0.0762
	Transfer			01 Feb 2019	1037	156867	0.0767
	Transfer			08 Feb 2019	(19545)	137322	0.0672
	Transfer			15 Feb 2019	(3300)	134022	0.0656
	Transfer			22 Feb 2019	13185	147207	0.0720
	Transfer			01 Mar 2019	(12253)	134954	0.0660
	Transfer			08 Mar 2019	18800	153754	0.0752
	Transfer			15 Mar 2019	9068	162822	0.0796
	Transfer			22 Mar 2019	107807	270629	0.1324
	Transfer			29 Mar 2019	215521	486150	0.2378
	AT THE END OF THE YEAR					486150	0.2378
10	RAVI JAIN	141649	0.0693			141649	0.0693
	Transfer			04 May 2018	(100000)	41649	0.0204
	Transfer			16 Nov 2018	100000	141649	0.0693
	Transfer			15 Feb 2019	50000	191649	0.0937
	Transfer			15 Mar 2019	165000	356649	0.1745
	Transfer			29 Mar 2019	110000	466649	0.2283
	AT THE END OF THE YEAR					466649	0.2283
11	R S SHARES AND SECURITIES LIMITED	561452	0.2746			561452	0.2746
	Transfer			06 Jul 2018	(464897)	96555	0.0472
	Transfer			14 Sep 2018	495628	592183	0.2897
	Transfer			18 Jan 2019	(495628)	96555	0.0472
	AT THE END OF THE YEAR					96555	0.0472
12	HANUMAN PRASAD GOYAL	17000000	8.3154			17000000	8.3154
	Transfer			06 Jul 2018	(17000000)	0	0.0000
	Transfer			14 Sep 2018	17000000	17000000	8.3154
	Transfer			18 Jan 2019	(17000000)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000
13	MUNNI DEVI GOYAL	17000000	8.3154			17000000	8.3154
	Transfer			06 Jul 2018	(17000000)	0	0.0000
	Transfer			14 Sep 2018	17000000	17000000	8.3154
	Transfer			18 Jan 2019	(17000000)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000

S. No.		Shareholding at the beginning of the year - 2018		Transactions during the year		Cumulative Shareholding at the end of the year - 2019	
	Name & Type of Transaction	NO.OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY	DATE OF TRANSACTION	NO. OF SHARES	NO OF SHARES HELD	% OF TOTAL SHARES OF THE COMPANY
14	NAVEEN GOYAL	14500000	7.0926			14500000	7.0926
	Transfer			06 Jul 2018	(14500000)	0	0.0000
	Transfer			14 Sep 2018	14500000	14500000	7.0926
	Transfer			31 Dec 2018	(6790432)	7709568	3.7711
	Transfer			18 Jan 2019	(7709568)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000
15	BABU LAL	1238047	0.6056			1238047	0.6056
	Transfer			06 Jul 2018	(1238047)	0	0.0000
	Transfer			14 Sep 2018	1238047	1238047	0.6056
	Transfer			18 Jan 2019	(1238047)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000
16	ADITYA VIKRAM AGARWAL (HUF) .	600000	0.2935			600000	0.2935
	Transfer			06 Jul 2018	(600000)	0	0.0000
	Transfer			14 Sep 2018	600000	600000	0.2935
	Transfer			18 Jan 2019	(600000)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000
17	RAJENDER PRASAD NUTHAKKI	529821	0.2592			529821	0.2592
	Transfer			06 Jul 2018	(529821)	0	0.0000
	Transfer			14 Sep 2018	540932	540932	0.2646
	Transfer			21 Sep 2018	13889	554821	0.2714
	Transfer			12 Oct 2018	40000	594821	0.2910
	Transfer			16 Nov 2018	10000	604821	0.2958
	Transfer			14 Dec 2018	15000	619821	0.3032
	Transfer			21 Dec 2018	10000	629821	0.3081
	Transfer			18 Jan 2019	(629821)	0	0.0000
	AT THE END OF THE YEAR					0	0.0000

Note:

1. Paid up Share Capital of the Company (Face Value Rs. 1.00) at the end of the year is 204439600 Shares.
2. The detail of holding has been clubbed based on PAN.
3. % of total Shares of the Company is based on the paid up Capital of the Company at the end of the Year.

E) Shareholding of Directors and Key Managerial Personnel:

S. No.	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
	At the beginning of the year	36539364	18.79	36539364	18.79
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.) –ESOP- 21.12.2018	97800	0.05	97800	0.05
	At the end of the year	36637164	17.92	36637164	17.92

V. INDEBTEDNESS -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	1816387000	-	-	1816387000
ii) Interest due but not paid	199131000	-	-	199131000
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	2015518000	-	-	2015518000
Change in Indebtedness during the financial year				
* Addition	-	-	-	113912000
* Reduction	(248401000)	-	-	(248401000)
Net Change	(248401000)	-	-	(248401000)
Indebtedness at the end of the financial year				
i) Principal Amount	1552926000	-	-	1552926000
ii) Interest due but not paid	214191000	-	-	214191000
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	1767117000			1767117000

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**A. Remuneration to Managing Director, Whole-time Directors and/or Manager:**

S. No.	Particulars of Remuneration				Total Amount
		B.D. Aggarwal	Bimla Devi Jindal	Kamini Jindal	
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	36,00,000	9,00,000	12,00,000	57,00,000
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission	-	-	-	-
	- as % of profit	-	-	-	-
	- others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-

B. Remuneration to other directors

S. No.	Particulars of Remuneration	Name of Directors				Total Amount
		Ram Awtar Mittal	Vishnu Bhagwan	Kishan Lal	Neeraj Chhabra	
1	Independent Directors					
	Fee for attending board committee meetings	750000	750000	750000	540000	2790000
	Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	Total (1)	750000	750000	750000	540000	2790000
2	Other Non-Executive Directors					
	Fee for attending board committee meetings	-	-	-	-	-
	Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	Total (2)	-	-	-	-	-
	Total (B)=(1+2)	750000	750000	750000	540000	2790000
	Total Managerial Remuneration	750000	750000	750000	540000	2790000

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/ WTD

S.No.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	C.S.(Gunjan Kumar Karn)	C.F.O.(Umesh Bansal)	Total
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	Not applicable	600000	1200000	1800000
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission	-	-	-	-
	- as % of profit	-	-	-	-
	others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-
	Total	Not applicable	600000	1200000	1800000

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil
B. DIRECTORS					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil
C. OTHER OFFICERS IN DEFAULT					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil