Name of Listed Entity: Sai Capital Limited

2 Scrip Code/Name of Scrip/Class of Security: 531931

3 Share Holding Pattern Filed under: 31b

4 Share Holding Pattern as on : 30-September-24

5 Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

| S.No. | Particulars | Yes/ No | Remarks |
|-------|--|---------|--------------------------|
| 1 | Whether the Listed Entity has issued any partly paid up shares? | No | |
| 2 | Whether the Listed Entity has issued any Convertible Securities? | No | |
| 3 | Whether the Listed Entity has issued any Warrants? | No | |
| 4 | Whether the Listed Entity has any shares against which depository receipts are issued? | No | |
| 5 | Whether the Listed Entity has any shares in locked-in? | No | |
| 6 | Whether any shares held by promoters are pledge or otherwise encumbered? | Yes | Promoter/ Promoter Group |
| 7 | Whether the Listed Entity has issued any differential Voting Rights? | No | |
| 8 | Whether the listed entity has any significant beneficial owner? | Yes | |

Statement showing foreign ownership limits

| Particular | Approved limits (%) | Limits utilized (%) |
|---------------------------------------|---------------------|---------------------|
| As on shareholding date | 24 | 13.02 |
| As on the end of previous 1st quarter | 24 | 13.02 |
| As on the end of previous 2nd quarter | 24 | 13.02 |
| As on the end of previous 3rd quarter | 24 | 13.02 |
| As on the end of previous 4th quarter | 24 | 13.16 |

| | Table 1 - Summary Statement holding of specified securities | | | | | | | | | | | | | | | | | | | | | | |
|----------|---|----------------------------------|-----------------------|------------------|------------------------|-----------------------------|---|-------------------|---|-------------|--------------------------------|---------------------------------|--|---|---|---------|-------------------------------------|------------------------------------|----------------------|-----------------------|------------------------|------------------|--------|
| Category | Category of shareholder | Nos. of shareholders (III) | shareholders | shareholders | No. of fully paid up | No. of Partly paid-up | No. of shares underlying | Total nos. | Shareholding as a % of total no. of shares (calculated as per | Number of V | sec | ghts held in urities (IX) | each class of | No. of Shares Underlying Outstanding convertible | Shareholding , as a % assuming full conversion of convertible securities (| | ber of Locked in shares (XII) | Number of SI or otherwise (X | encumbered | Number of equity | Sub-c | ategorization of | shares |
| (I) | (II) | | equity shares held | equity shares | Depository Receipts | (VII) = (IV)+(V)+ (VI) | SCRR, 1957) (VIII) As a % of (A+B+C2) | No of Voting Righ | | ights | ~ | | as a percentage of diluted share capital) | , | As a % of | | As a | dematerialized form | a | | | | |
| | | | (IV) | held (V) | (VI) | (14)+(4)+(41) | | Class eg: X | Class eg:y | Total | Total as a % of (A+B+ C) | Warrants) (X) | (XI)= (VII)+(X) As a % of (A+B+C2) | No. | total Shares held (b) | No. (a) | % of total Share s held (b) | | Sub- category (i) | Sub- category (ii) | Sub- category (iii) | | |
| (A) | Promoter & Promoter Group | 6 | 2122700 | 0 | 0 | 2122700 | 73.723 | 2122700 | 0 | 2122700 | 73.723 | 0 | 73.723 | 0 | 0.000 | 1468444 | 69.178 | 1796200 | | | | | |
| (B) | Public | 1551 | 756600 | 0 | 0 | 756600 | 26.277 | 756600 | 0 | 756600 | 26.277 | 0 | 26.277 | 0 | 0.000 | NA | NA | 191700 | 0 | 0 | 0 | | |
| (C) | Non Promoter- Non Public | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | | | |
| (C1) | Shares underlying DRs | 0 | 0 | 0 | 0 | 0 | NA | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | | | |
| (C2) | Shares held by Employee Trusts | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | | | |
| | Total | 1557 | 2879300 | 0 | 0 | 2879300 | 100.000 | 2879300 | 0 | 2879300 | 100.000 | 0 | 100.000 | 0 | 0.000 | 1468444 | 51.000 | 1987900 | 0 | 0 | 0 | | |

| T-11- II C4-4 | showing shareholding natt | £ 41- D 4 | 1 D C |
|---------------|---------------------------|-----------|-------|
| | | | |

| 1 | | | | | Table | II - Statement | showing shareholdi | ng pattern o | f the Prom | oter and Pron | noter Group | • | | | | | | | | | |
|--------------|--|-----------------------|---------------------|-----------------------|--------------------------|--------------------|---|--------------|-------------|------------------------|---|--|--|---|--|--------------------------------|--|------------------------------|-------------------------|--------------------------|---------------------------|
| | | | No. of fully | Partly paid-up | Nos. of shares | shares held | Shareholding % calculated as per SCRR, 1957 | Number of | seci | thts held in eartities | ach class of | No. of Shares Underlying Outstanding | Shareholding, as a % assuming full conversion of convertible | Number of Locked in shares (XII) | | pledged or other encumbered | | Number of equity | Sub-cate | gorization | of shares |
| s. | Category & Name of the Shareholders | No. of shareholder | paid up equity | equity | underlying Depository | | | No | of Voting B | ights | | convertible | securities (as a | | | | | shares held in | | | |
| No. | (I) | (III) | shares held (IV) | shares held (V) | Receipts (VI) | (VII = IV+V+VI) | As a % of (A+B+C2) (VIII) | Class X | ClassY | Total | Total as a % of Total Voting rights | securities (including Warrants) (X) | percentage of diluted share capital) (XI) = (VII)+(X) as a % of A+B+C2 | No. (a) | As a % of total Shar es held (b) | No. (a) | As a % of total Shar es held (b) | dematerialized form (XIV) | Sub- category (i) | Sub- category (ii) | Sub- category (iii) |
| (1) | Indian | | | | | | | | | | | | | | | | | | | | |
| (a) | Individuals/Hindu Undivided Family | 2 | 155700 | 0 | 0 | 155700 | 5.408 | 155700 | 0 | 155700 | 5.408 | 0 | 5.408 | 0 | 0.000 | 0 | 0.000 | 155700 | 0 | 0 | 0 |
| | NIRAJ KUMAR SINGH | 1 | 138600 | 0 | 0 | 138600 | 4.814 | 138600 | 0 | 138600 | 4.814 | 0 | 4.814 | 0 | 0.000 | 0 | 0.000 | 138600 | | | |
| | JUHI SINGH | 1 | 17100 | 0 | 0 | 17100 | 0.594 | 17100 | 0 | 17100 | 0.594 | 0 | 0.594 | 0 | 0.000 | 0 | 0.000 | 17100 | | | |
| (b) | Central Government/State Government(s) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | 0 | 0.000 | 0 | | | |
| (c) | Financial Institutions/Banks | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | 0 | 0.000 | 0 | | | |
| (d) | Any Others (specify) # BODY CORPORATES | 3 | 1640500 | 0 | 0 | 1640500 | 56.976 | 1640500 | 0 | 1640500 | 56.976 | 0 | 56.976 | 0 | 0.000 | 1468444 | 69.178 | 1640500 | 0 | 0 | 0 |
| | SAI ENTERPRISES PVT LTD | 1 | 361100 | 0 | 0 | 361100 | 12.541 | 361100 | 0 | 361100 | 12.541 | 0 | 12.541 | 0 | 0.000 | 335300 | 92.855 | 361100 | | | |
| | SAI BUSINESS AND CONSULTANCY SYSTEMS PVT LTD | 1 | 362600 | 0 | 0 | 362600 | 12.593 | 362600 | 0 | 362600 | 12.593 | 0 | 12.593 | 0 | 0.000 | 336900 | 92.912 | 362600 | | | |
| | SAI AGENCIES PVT LTD | 1 | 916800 | 0 | 0 | 916800 | 31.841 | 916800 | 0 | 916800 | 31.841 | 0 | 31.841 | 0 | 0.000 | 796244 | 86.850 | 916800 | | | |
| (f) | Any Others (specify) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | | | |
| | Sub-Total(A)(1) | 5 | 1796200 | 0 | 0 | 1796200 | 62.383 | 1796200 | 0 | 1796200 | 62.383 | 0 | 62.383 | 0 | 0.000 | 0 | 0.000 | 1796200 | 0 | 0 | 0 |
| (2) | Foreign | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | | | |
| (a) | Individuals (Non- Resident Individuals/ Foreign Individuals) | 1 | 326500 | 0 | 0 | 326500 | 11.340 | 326500 | 0 | 326500 | 11.340 | 0 | 11.340 | 0 | 0.000 | 0 | 0.000 | 0 | 0 | 0 | 0 |
| | SANJIV ASTHANA | 1 | 326500 | 0 | 0 | 326500 | 11.340 | 326500 | 0 | 326500 | 11.340 | 0 | 11.340 | 0 | 0.000 | 0 | 0.000 | 0 | | | |
| (b) | Government | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | | | |
| (c) | Institutions | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | 0 | 0.000 | 0 | | | |
| (d) | Foreign Portfolio Investor | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | 0 | | | |
| | Sub-Total (A)(2) | 1 | 326500 | 0 | 0 | 326500 | 11.340 | 326500 | 0 | 326500 | 11.340 | 0 | 11.340 | 0 | 0.000 | 0 | 0.000 | 0 | 0 | 0 | 0 |
| | Total Shareholding of Promoter and Promoter Group (A)= $(A)(1)+(A)(2)$ | 6 | 2122700 | 0 | 0 | 2122700 | 73.723 | 2122700 | 0 | 2122700 | 73.723 | 0 | 73.723 | 0 | 0.000 | 1468444 | 69.178 | 1796200 | 0 | 0 | 0 |

| Table III - Statement chowing | g shareholding pattern of the Public Shareholder |
|-------------------------------|--|
| | |

| l | | | | | | | Table III | - Statement | showing sh | areholding p | attern of the | Public Sharehold | er | | | | | | | | |
|-----|--|----------------------|------------------|-----------------------|--------------------------------|---------------------------|----------------------------------|-------------|-------------|----------------------|--|--|---|---------|---|-------------------------------|--|------------------------------------|-------------------------|--------------------------|---------------------------|
| | | | No. of fully | Partly paid-up | Nos. of shares | Total non | Shareholding % calculated as per | Number o | seci | thts held in earties | ach class of | No. of Shares Underlying Outstanding | Total Shareholding, as a % assuming full | sha | Locked in res | Number of pledged or encumber | | Number of contin | Sub-cate | egorization | of shares |
| s. | Category & Name of the | No. of | paid up equity | equity | underlying | Total nos. shares held | SCRR, 1957 | No | of Voting R | ights | | convertible | conversion of convertible | | | | | Number of equity shares held in | | | |
| No. | Shareholders (I) | shareholder (III) | shares held (IV) | shares held (V) | Depository Receipts (VI) | (VII = IV+V+VI) | As a % of (A+B+C2) (VIII) | Class X | ClassY | Total | Total as a % of Total Voting rights | securities (including Warrants) (X) | securities (as a percentage of diluted share capital) (XI) | No. (a) | As a % of total Shar es held (b) | No. (a) | As a % of total Shar es held (Not applicabl e)(b) | dematerialized form (XIV) | Sub- category (i) | Sub- category (ii) | Sub- category (iii) |
| (1) | Institutions | | | | | | | | | | | | | | | | | | | | |
| (a) | Mutual Fund | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| (b) | Venture Capital Funds | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | <u> </u> |
| (c) | Alternate investment Funds | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | <u> </u> | |
| (d) | Foreign Venture Capital Investors | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| (e) | Foreign Portfolio Investors | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | <u> </u> |
| (f) | Financial Institutions/ Banks | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | <u> </u> |
| (g) | Insurance Companies | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| (h) | Provident Funds/ Pension Funds | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | ↓ |
| (i) | Any Others (specify) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | |
| (2) | Sub-Total(B)(1) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | <u> </u> | |
| (2) | Central Government/ State Government(s)/ President of India | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| | Sub-Total (B)(2) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | |
| (3) | Non-institutions | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | |
| (a) | Individuals -i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs. | 1528 | 641954 | 0 | 0 | 641954 | 22.295 | 641954 | 0 | 641954 | 22.295 | 0 | 22.295 | 0 | 0.000 | NA | NA | 97554 | 0 | 0 | 0 |
| | Individual shareholders holding nominal share capital in excess of Rs. Lakhs. | 2 | 53554 | 0 | 0 | 53554 | 1.860 | 53554 | 0 | 53554 | 1.860 | 0 | 1.860 | 0 | 0.000 | NA | NA | 53554 | 0 | 0 | 0 |
| | KAILASH CHANDRA SHARMA | 1 | 29400 | 0 | 0 | 29400 | 1.021 | 29400 | 0 | 29400 | 1.021 | 0 | 1.021 | 0 | 0.000 | NA | NA | 29400 | | | |
| | Non Resident Indians (NRIs) | 8 | 48487 | 0 | 0 | 48487 | 1.684 | 48487 | 0 | 48487 | 1.684 | 0 | 1.684 | 0 | 0.000 | NA | NA | 28787 | 0 | 0 | 0 |
| (b) | NBFCs registered with RBI | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| (c) | Employee Trusts | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | | | |
| (d) | Overseas Depositories (holding DRs) (balancing figure) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | | | |
| (e) | Body Corporates | 4 | 7847 | 0 | 0 | 7847 | 0.273 | 7847 | 0 | 7847 | 0.273 | 0 | 0.273 | 0 | 0.000 | NA | NA | 7047 | 0 | 0 | 0 |
| (f) | Any Other | 9 | 4758 | 0 | 0 | 4758 | 0.165 | 4758 | 0 | 4758 | 0.165 | 0 | 0.165 | 0 | 0.000 | NA | NA | 4758 | 0 | 0 | 0 |
| | LLP | 1 | 3022 | 0 | 0 | 3022 | 0.105 | 3022 | 0 | 3022 | 0.105 | 0 | 0.105 | 0 | 0.000 | NA | NA | 3022 | | | |
| | Resident HUF | 8 | 1736 | 0 | 0 | 1736 | 0.060 | 1736 | 0 | 1736 | 0.060 | 0 | 0.060 | 0 | 0.000 | NA | NA | 1736 | | | |
| | Sub-Total (B)(3) | 1551 | 756600 | 0 | 0 | 756600 | 26.277 | 756600 | 0 | 756600 | 26.277 | 0 | 26.277 | 0 | 0 | NA | NA | 191700 | 0 | 0 | 0 |
| | Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3) | 1551 | 756600 | 0 | 0 | 756600 | 26.277 | 756600 | 0 | 756600 | 26.277 | 0 | 26.277 | 0 | 0.000 | NA | NA | 191700 | 0 | 0 | 0 |

| | | | | | T | able IV - State | ment showing shar | eholding pat | ttern of the | Non Promote | r - Non Publi | c Shareholder | | | | | | | |
|-----|--|--------------------------------|----------------|--------------------------|--|-----------------------------------|-------------------------------------|--------------|--------------|------------------|--------------------------------|--|--|--|------------------------------|--|-------------------------------|--|--|
| | Category & Name of the Shareholders (I) | | No. of fully | Partly paid-up | Nos. of shares underlying | Total nos. | Shareholding % calculated as per | | | | ach class of | No. of Shares Underlying Outstanding | Total Shareholding, as a % assuming full conversion of | Number of Locked in shares (XII) | | Number of Shares pledged or otherwise encumbered(XIII) | | Number of equity | |
| | | No. of shareholder (III) | naid un equity | equity shares held | underlying Depository Receipts (VI) | shares held (VII = IV+V+VI) | SCRR, 1957 As a % of (A+B+C2) | No | of Voting R | of Voting Rights | | convertible securities | convertible securities (as a percentage of | | As a % of | No. (Not | As a % of total Shar es | shares held in dematerialized form (XIV) | |
| | | | | (V) | (VI) | | (VIII) | Class X | ClassY | Total | % of Total Voting rights | Warrants) (X) | diluted share capital) (XI) | No. (a) | total Shar es held (b) | applicable) | | | |
| (1) | Custodian/DR Holder | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | | 0.000 | NA | NA | 0 | |
| | Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014) | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | |
| | Total Non-Promoter-Non-Public Shareholding $(C)=(C)(1)+(C)(2)$ | 0 | 0 | 0 | 0 | 0 | 0.000 | 0 | 0 | 0 | 0.000 | 0 | 0.000 | 0 | 0.000 | NA | NA | 0 | |

Table V- Statement showing details of significant beneficial owners (SBOs)

| | Details of the | SBO | Details of the registe | | Who | | Date of creation / acquisition of | | | |
|-------|-------------------|-------------|--|-------------|-------------|-----------------|-----------------------------------|------------------------|---|------------------------------------|
| S.No. | Name | Nationality | Name | Nationality | Shares % | Voting Rights % | Dividend Rights % | Exercise of Control | Exercise of Significant Influence | significant beneficial interest |
| 1 | Niraj Kumar Singh | Indian | Sai Enterprises Private Limited | Indian | 12.54 | 12.54 | 12.54 | Yes | Yes | 13-07-1996 |
| 2 | Niraj Kumar Singh | Indian | Sai Business and Consultancy Systems Private Limited | Indian | 12.59 | 12.59 | 12.59 | Yes | Yes | 13-07-1996 |
| 3 | Niraj Kumar Singh | Indian | Sai Agencies Private Limited | Indian | 31.84 | 31.84 | 31.84 | Yes | Yes | 13-07-1996 |