

- 1 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-21  
5 Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

<b>S.No.</b>	<b>Particulars</b>	<b>Yes/ No</b>	<b>Remarks</b>
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	

Table I - Summary Statement holding of specified securities

Category (I)	Category of shareholder (II)	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 Shares Underlying Outstanding convertible securities (including Warrants) (X)	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 of Voting Rights			Total as a % of (A+B+C)			No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)	
								Class eg: X	Class eg:y	Total								
(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	988	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0.000	NA	NA	178400
(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
	<b>Total</b>	<b>994</b>	<b>2879300</b>	<b>0</b>	<b>0</b>	<b>2879300</b>	<b>100.000</b>	<b>2879300</b>	<b>0</b>	<b>2879300</b>	<b>100.000</b>	<b>0</b>	<b>100.000</b>	<b>0</b>	<b>0.000</b>	<b>1468444</b>	<b>51.000</b>	<b>1974600</b>

**Table II - Statement showing shareholding pattern of the Promoter and Promoter Group**

S. No.	Category & Name of the Shareholders (I)	No. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	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 of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (b)		
								Class X	Class Y	Total									
(1)	<b>Indian</b>																		
(a)	<b>Individuals/Hindu Undivided Family</b>	<b>2</b>	<b>155700</b>	<b>0</b>	<b>0</b>	<b>155700</b>	<b>5.408</b>	<b>155700</b>	<b>0</b>	<b>155700</b>	<b>5.408</b>	<b>0</b>	<b>5.408</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>155700</b>	
	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	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	0.000	0	0.000	0	
(d)	<b>Any Others (specify) # BODY CORPORATES</b>	<b>3</b>	<b>1640500</b>	<b>0</b>	<b>0</b>	<b>1640500</b>	<b>56.976</b>	<b>1640500</b>	<b>0</b>	<b>1640500</b>	<b>56.976</b>	<b>0</b>	<b>56.976</b>	<b>0</b>	<b>0.000</b>	<b>1468444</b>	<b>69.178</b>	<b>1640500</b>	
	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	
	<b>Sub-Total(A)(1)</b>	<b>5</b>	<b>1796200</b>	<b>0</b>	<b>0</b>	<b>1796200</b>	<b>62.383</b>	<b>1796200</b>	<b>0</b>	<b>1796200</b>	<b>62.383</b>	<b>0</b>	<b>62.383</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>1796200</b>	
(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)	<b>Individuals (Non- Resident Individuals/ Foreign Individuals)</b>	<b>1</b>	<b>326500</b>	<b>0</b>	<b>0</b>	<b>326500</b>	<b>11.340</b>	<b>326500</b>	<b>0</b>	<b>326500</b>	<b>11.340</b>	<b>0</b>	<b>11.340</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	
	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	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	
	<b>Sub-Total (A)(2)</b>	<b>1</b>	<b>326500</b>	<b>0</b>	<b>0</b>	<b>326500</b>	<b>11.340</b>	<b>326500</b>	<b>0</b>	<b>326500</b>	<b>11.340</b>	<b>0</b>	<b>11.340</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	
	<b>Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)</b>	<b>6</b>	<b>2122700</b>	<b>0</b>	<b>0</b>	<b>2122700</b>	<b>73.723</b>	<b>2122700</b>	<b>0</b>	<b>2122700</b>	<b>73.723</b>	<b>0</b>	<b>73.723</b>	<b>0</b>	<b>0.000</b>	<b>1468444</b>	<b>69.178</b>	<b>1796200</b>	

3,26,500 Shares out of total Promoter Shareholding of 21,22,700 Shares held by Mr. Sanjiv Asthana (Foreign Promoter Shareholder) are not in Dematerialized Form. Mr. Asthana is a Non Resident Indian (N.R.I.), residing in the United States of America (U.S.A.). The Shareholding is listed under the Foreign Category.

The entire balance Domestic Promoter Shareholding of 17,96,200 Shares is held in Dematerialized Form.

Table III - Statement showing shareholding pattern of the Public Shareholder

S. No.	Category & Name of the Shareholders (I)	No. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total Shareholding, as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered(XIII)		Number of equity shares held in dematerialized form (XIV)
								No of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total Shares held (Not applicable)(b)	
								Class X	Class Y	Total								
(1)	<b>Institutions</b>																	
(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	
(c)	Alternate investment Funds	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0.000	NA	NA	0	
(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	
(f)	Financial Institutions/ Banks	1	84300	0	0	84300	2.928	84300	0	84300	2.928	0	2.928	0	0.000	NA	NA	84300
	UNION BANK OF INDIA	1	84300	0	0	84300	2.928	84300	0	84300	2.928	0	2.928	0	0.000	NA	NA	84300
(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
	<b>Sub-Total(B)(1)</b>	<b>1</b>	<b>84300</b>	<b>0</b>	<b>0</b>	<b>84300</b>	<b>2.928</b>	<b>84300</b>	<b>0</b>	<b>84300</b>	<b>2.928</b>	<b>0</b>	<b>2.928</b>	<b>0</b>	<b>0.000</b>	<b>NA</b>	<b>NA</b>	<b>84300</b>
(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	
	<b>Sub-Total (B)(2)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>NA</b>	<b>NA</b>	<b>0</b>
(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)	i. Individuals -i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.	976	561746	0	0	561746	19.510	561746	0	561746	19.510	0	19.510	0	0.000	NA	NA	4046
(a)	ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	3	86954	0	0	86954	3.020	86954	0	86954	3.020	0	3.020	0	0.000	NA	NA	86954
	MAHENDRA KUMAR PANDEY	1	29900	0	0	29900	1.038	29900	0	29900	1.038	0	1.038	0	0.000	NA	NA	29900
	KAILASH CHANDRA SHARMA	1	29400	0	0	29400	1.021	29400	0	29400	1.021	0	1.021	0	0.000	NA	NA	29400
(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)	Any Other (specify) # CORPORATE BODY	2	3900	0	0	3900	0.135	3900	0	3900	0.135	0	0.135	0	0.000	NA	NA	3100
(f)	Any Other (specify) # NRI	6	19700	0	0	19700	0.684	19700	0	19700	0.684	0	0.684	0	0.000	NA	NA	0
	<b>Sub-Total (B)(3)</b>	<b>987</b>	<b>672300</b>	<b>0</b>	<b>0</b>	<b>672300</b>	<b>23.349</b>	<b>672300</b>	<b>0</b>	<b>672300</b>	<b>23.349</b>	<b>0</b>	<b>23.349</b>	<b>0</b>	<b>0.000</b>	<b>NA</b>	<b>NA</b>	<b>94100</b>
	<b>Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)</b>	<b>988</b>	<b>756600</b>	<b>0</b>	<b>0</b>	<b>756600</b>	<b>26.277</b>	<b>756600</b>	<b>0</b>	<b>756600</b>	<b>26.277</b>	<b>0</b>	<b>26.277</b>	<b>0</b>	<b>0.000</b>	<b>NA</b>	<b>NA</b>	<b>178400</b>

Table IV - Statement showing shareholding pattern of the Non Promoter - Non Public Shareholder

	Category & Name of the Shareholders (I)	No. of shareholder (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total Shareholding, as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered(XIII)		Number of equity shares held in dematerialized form (XIV)
								No of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (Not applicable)	As a % of total Shares held (Not applicable)(b)	
								Class X	Class Y	Total								
(1)	Custodian/DR Holder	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0.000	NA	NA	0	
(2)	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
	<b>Total Non-Promoter-Non-Public Shareholding (C)=(C)(1)+(C)(2)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>0</b>	<b>0.000</b>	<b>NA</b>	<b>NA</b>	<b>0</b>

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

S.No.	Details of the SBO		Details of the registered owner		Whether by virtue of:					Date of creation / acquisition of significant beneficial interest
	Name	Nationality	Name	Nationality	Shares %	Voting Rights %	Dividend Rights %	Exercise of Control	Exercise of Significant Influence	
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