

- 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 : 31-Dec-24  
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	

**Statement showing foreign ownership limits**

<b>Particular</b>	<b>Approved limits (%)</b>	<b>Limits utilized (%)</b>
As on shareholding date	24	13.03
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	13.02

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)	Sub-categorization of shares			
								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)	Sub- category (i)	Sub- category (ii)	Sub- category (iii)
								Class eg: X	Class egy	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	2453	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			
	<b>Total</b>	<b>2459</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>1987900</b>	<b>0</b>	<b>0</b>	<b>0</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)	Sub-categorization of shares						
								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)		Sub-category (i)	Sub-category (ii)	Sub-category (iii)				
								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>	<b>0</b>	<b>0</b>	<b>0</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>89.510</b>	<b>1640500</b>	<b>0</b>	<b>0</b>	<b>0</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>1468444</b>	<b>81.750</b>	<b>1796200</b>	<b>0</b>	<b>0</b>	<b>0</b>				
(2)	<b>Foreign</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>0</b>	<b>0.000</b>	<b>0</b>							
(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>	<b>0</b>	<b>0</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>0</b>	<b>0</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>	<b>0</b>	<b>0</b>	<b>0</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)	Sub-categorization of shares			
								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)		Sub-category (i)	Sub-category (ii)	Sub-category (iii)	
								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	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	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	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	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	0.000	NA	NA	0				
(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				
(g)	Insurance Companies	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	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>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>				
(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	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)	Individuals -i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs.	2422	667314	0	0	667314	23.176	667314	0	667314	23.176	0	23.176	0	0.000	NA	NA	122914	0	0	0	
	ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	1	29400	0	0	29400	1.021	29400	0	29400	1.021	0	1.021	0	0.000	NA	NA	29400	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)	11	48762	0	0	48762	1.694	48762	0	48762	1.694	0	1.694	0	0.000	NA	NA	29062	0	0	0	
	JAYASEELAN SINGARAVELU	1	28797	0	0	28797	1.000	28797	0	28797	1.000	0	1.000	0	0.000	NA	NA	28797				
(b)	NBFCs registered with RBI	0	0	0	0	0	0.000	0	0	0	0.000	0	0.000	0	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	0.000	NA	NA	0				
(e)	Body Corporates	4	7896	0	0	7896	0.274	7896	0	7896	0.274	0	0.274	0	0.000	NA	NA	7096	0	0	0	
(f)	Any Other	15	3228	0	0	3228	0.112	3228	0	3228	0.112	0	0.112	0	0.000	NA	NA	3228	0	0	0	
	Clearing Members	1	228	0	0	228	0.008	228	0	228	0.008	0	0.008	0	0.000	NA	NA	228				
	HUF	12	2240	0	0	2240	0.078	2240	0	2240	0.078	0	0.078	0	0.000	NA	NA	2240				
	LLP	2	760	0	0	760	0.026	760	0	760	0.026	0	0.026	0	0.000	NA	NA	760				
	<b>Sub-Total (B)(3)</b>	<b>2453</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</b>	<b>NA</b>	<b>NA</b>	<b>191700</b>	<b>0</b>	<b>0</b>	<b>0</b>	
	<b>Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)</b>	<b>2453</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>191700</b>	<b>0</b>	<b>0</b>	<b>0</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