

- 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-23
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	13.16
As on the end of previous 1st quarter	100	13.15
As on the end of previous 2nd quarter	100	13.15
As on the end of previous 3rd quarter	100	13.07
As on the end of previous 4th quarter	100	13.06

Until the previous Quarter ended June 30, 2023, the permissible aggregate limit of Foreign Investment in the case of the Company was the Sectoral Limit which is 100 %.

At their Meeting held on September 01, 2023, the Board of Directors of the Company adopted a Resolution for fixing the total Shareholding limit of Non- Resident Indians (NRIs); Foreign Portfolio Investors (FPIs) and Foreign Institutional Investors (FIIs), up to an aggregate of 24% of the Paid-up Equity Share Capital of the Company.

The Shareholders of the Company at their 28th Annual General Meeting held on September 29, 2023 adopted a Special Resolution for approving the total Shareholding of Non- Resident Indians (NRIs); Foreign Portfolio Investors (FPIs) and Foreign Institutional Investors (FIIs), up to an aggregate limit of 24% of the Paid-up Equity Share Capital of the Company.

As such, the Approved Limit of Foreign Ownership effective the current Quarter ended September 30, 2023 is 24 %.

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	1530	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0.000	NA	NA	191700
(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	1536	2879300	0	0	2879300	100.000	2879300	0	2879300	100.000	0	100.000	0	0.000	1468444	51.000	1987900

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	ClassY	Total									
(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	
	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)	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	
	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	
(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	
	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	
	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	
	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	

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)	Institutions																	
(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
	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
(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
	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.	1510	617849	0	0	617849	21.458	617849	0	617849	21.458	0	21.458	0	0.000	NA	NA	73449
	ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	3	79797	0	0	79797	2.771	79797	0	79797	2.771	0	2.771	0	0.000	NA	NA	79797
	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)	7	52477	0	0	52477	1.823	52477	0	52477	1.823	0	1.823	0	0.000	NA	NA	32777
	JAYASEELAN SINGARAVELU	1	32777	0	0	32777	1.138	32777	0	32777	1.138	0	1.138	0	0.000	NA	NA	32777
(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	2	803	0	0	803	0.028	803	0	803	0.028	0	0.028	0	0.000	NA	NA	3
(f)	Any Other	8	5674	0	0	5674	0.197	5674	0	5674	0.197	0	0.197	0	0.000	NA	NA	5674
	Clearing Member	3	273	0	0	273	0.009	273	0	273	0.009	0	0.009	0	0.000	NA	NA	273
	Resident HUF	4	912	0	0	912	0.032	912	0	912	0.032	0	0.032	0	0.000	NA	NA	912
	Sub-Total (B)(3)	1530	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0	NA	NA	191700
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)	1530	756600	0	0	756600	26.277	756600	0	756600	26.277	0	26.277	0	0.000	NA	NA	191700

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
	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)

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