to the directors' report

FORM No. MGT-9 **EXTRACT OF ANNUAL RETURN**

as on the financial year ended 31.03.2019

[Pursuant to Section 92(3) of the Companies Act, 2013, and Rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. Registration and other details

CIN	L27100MH1973PLC016617
Registration Date	23.06.1973
Name of the Company	Sarda Energy & Minerals Limited
Category / Sub-Category of the Company	Public company / Limited by shares
Address of the Registered Office and contact details	73-A, Central Avenue, Nagpur (M.H.) 440018
	Tel: +91-712-2722407
Whether listed company	Yes
Name, address and contact details of Registrar and	Bigshare Services Private Limited
Transfer Agent, if any	1st Floor, Bharat Tin Works Building
	Opp. Basant Oasis, Makwana Road
	Marol, Andheri East, Mumbai - 400059, Maharashtra
	Tel: +91-22-6263 8200, Fax: +91-22-6263 8299
	E-mail: investor@bigshareonline.com

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 :

SI.	Name and Description of main	NIC Code of the Product / Service	% to total turnover of the
No.	Products / Services		Company
1	Sponge Iron/Ferro Alloys/Billet/	241 - Manufacture of	95.66%
	Wire-rod/ Iron ore Pellet	basic iron and steel	

III. Particulars of Holding, Subsidiary and Associate Companies

Name and address of the Company	CIN / GLN	Holding / Subsidiary / Associate	% of shares held	Applicable Section
Sarda Energy & Minerals Hongkong Limited 5th Floor, Dah Sing Life Bldg.,99-105 Des Voeux Road, Central, Hongkong	NA	Subsidiary	100.00%	2(87)(ii)
Sarda Global Venture Pte. Limited 9, Raffles Place, #57-00, Republic Plaza, Singapore - 048619	NA	Subsidiary	100.00%	2(87)(ii)
Sarda Global Trading DMCC Unit No.1241, DMCC Business Centre, Level No.1, Jewellery & Gemplex 3, Dubai, UAE	NA	Subsidiary	100.00%	2(87)(ii)
Sarda Metals & Alloys Limited 125-B Wing, Mittal Court, Nariman Point, Mumbai	U51420MH2008PLC187689	Subsidiary	100.00%	2(87)(ii)
Sarda Energy Limited Vanijya Bhawan, 1st Floor, Sai Nagar Devendra Nagar Road, Raipur	U40102CT2008PLC000406	Subsidiary	100.00%	2(87)(ii)

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Name and address of the Company	CIN / GLN	Holding / Subsidiary / Associate	% of shares held	Applicable Section
Madhya Bharat Power Corporation Limited E-585, Ground Floor, Greater Kailash - II, New Delhi	U74899DL1994PLC061349	Subsidiary	68.31%	2(87)(ii)
Parvatiya Power Limited 136 Khari Bazar, Ranikhet, Uttranchal	U40101UP1994PLC017151	Subsidiary	51.00%	2(87)(ii)
Sarda Hydro Power LLP# HIG Duplex House No2A Moulshri Vihar, Purena Raipur	AAO-4263	Subsidiary	60.00%	2(87)(ii)
Raipur Fabritech Private Limited* 125-B Wing, Mittal Court, Nariman Point, Mumbai	U28910MH2011PTC221297	Subsidiary	52.38%	2(87)(ii)
Raipur Industrial Gases Private Limited* 125-B Wing, Mittal Court, Nariman Point, Mumbai	U40300MH2011PTC224871	Subsidiary	51.00%	2(87)(ii)
Natural Resources Energy Private Limited JMG House, Near Abhivadan House, Panchsheel Nagar, Raipur	U40101CT2007PTC020163	Subsidiary	71.55%	2(87)(ii)
Chhattisgarh Hydro Power LLP House No.A/02, VIP Road, Moul Shree Vihar, Raipur	AAA-2277	Subsidiary	60.00%	2(87)(ii)
Shri Ram Electricity LLP Vanijya Bhawan, 1st Floor, Sai Nagar, Devendra Nagar Road, Raipur	AAA-2517	Subsidiary	51.00%	2(87)(ii)
Raipur Infrastructure Company Limited Vanijya Bhawan, Sai Nagar Devendra Nagar Road, Raipur	U45203CT2004PLC016321	Associate	33.33%	2(6)
Madanpur South Coal Company Limited Vanijya Bhawan, Sai Nagar Devendra Nagar Road, Raipur	U10300CT2006PLC020006	Associate	20.13%	2(6)

[#] Converted into LLP from Sarda Hydro Power Private Limited

IV. Shareholding Pattern (Equity Share Capital Breakup as percentage of Total Equity)

Category-wise Shareholding

Category of Shareholders		o. of Shares peginning o	held at the of the year		No. of shares held at the end of the year				% Change
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual / HUF	79,07,397	0	79,07,397	21.93	79,07,397	0	79,07,397	21.93	0.00
b) Central Govt.	0	0	0	0.00	0	0	0	0.00	0.00
c) State Govt.(s)	0	0	0	0.00	0	0	0	0.00	0.00
d) Bodies Corporate	1,79,89,232	0	1,79,89,232	49.90	1,80,79,232	0	1,80,79,232	50.15	0.25
e) Banks / FI	0	0	0	0.00	0	0	0	0.00	0.00

^{*} Companies under strike-off.

Category of	Category of No. of Shares held at the Shareholders beginning of the year				No. of sl	hares held	at the end of t	he year	% Change
Shareholders				0/ 6		51 1 1		0/ 5	Change
	Demat	Physical	Total	% of	Demat	Physical	Total	% of	
				Total Shares				Total Shares	
f) Any Other	0	0	0	0.00	0	0	0	0.00	0.00
f i) Firm	1,47,731	0	1,47,731	0.00	1,47,731	0	1,47,731	0.00	0.00
Sub-Total (A)(1):	2,60,44,360	0	2,60,44,360	72.25	2,61,34,360	0	2,61,34,360	72.50	0.00
(2) Foreign	2,00,44,300	0	2,00,44,300	72.23	2,01,34,300	0	2,01,34,300	72.30	0.23
a) NRIs - Individuals	0	0	0	0.00	0	0	0	0.00	0.00
b) Other -	0	0	0	0.00	0	0	0	0.00	0.00
Individuals	•		· ·	0.00				0.00	0.00
c) Bodies Corporate	0	0	0	0.00	0	0	0	0.00	0.00
d) Banks / FI	0	0	0	0.00	0	0	0	0.00	0.00
e) Any Other	0	0	0	0.00	0	0	0	0.00	0.00
Sub-Total (A)(2):	0	0	0	0.00	0	0	0	0.00	0.00
Total Shareholding	2,60,44,360	0	2,60,44,360	72.25	2,61,34,360	0	2,61,34,360	72.50	0.25
of Promoters (A) =	, ,		,, ,		, , , , , , , , , , , ,		, , , , , , , , , , , , ,		
(A)(1)+(A)(2)									
B. Public									
Shareholding									
(1) Institutions									
a) Mutual Funds	0	0	0	0.00	0	0	0	0.00	0.00
, / UTI									
b) Banks / FI	31,570	2,500	34,070	0.09	19,515	2,500	22,015	0.06	(0.03)
c) Central Govt.	0	0	0	0.00	0	0	0	0.00	0.00
d) State Govt.(s)	0	0	0	0.00	0	0	0	0.00	0.00
e) Venture Capital	0	0	0	0.00	0	0	0	0.00	0.00
Funds									
f) Insurance	0	250	250	0.00	0	250	250	0.00	0.00
Companies									
g) FIIs	11,220	0	11,220	0.03	0	0	0	0.00	(0.03)
h) Foreign Portfolio	9,81,771	0	9,81,771	2.72	7,87,587	0	7,87,587	2.18	(0.54)
Investors									, ,
i) Others (specify)	0	0	0	0.00	0	0	0	0.00	0.00
Sub-Total (B)(1):	10,24,561	2,750	10,27,311	2.85	8,07,102	2,750	8,09,852	2.25	(0.60)
(2) Non-Institutions	· · ·	,	, ,		, ,	,			, ,
a) Bodies Corporate									
i) Indian	14,91,703	9,949	15,01,652	4.17	15,58,170	9,949	15,68,119	4.35	0.18
ii) Overseas	16,84,891	0	16,84,891	4.67	6,84,891	0	6,84,891	1.90	(2.77)
b) Individuals			,5 .,001		2,5.,551		2,3.,001		(=)
i) Individual Share	34,90,603	3,25,680	38,16,283	10.59	39,86,096	2,96,459	42,82,555	11.88	1.29
hol- ders holding	3-,,50,003	3,23,000	30,10,203	10.55	33,30,030	2,30,433	72,02,333	11.00	1.23
nominal share									
capital upto									
₹1 lakh									

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Category of Shareholders		o. of Shares peginning o	held at the f the year		No. of sl	hares held	at the end of t	he year	% Change
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
i) Individual Share hol- ders holding nominal share capital in excess of ₹1 lakh	11,86,952	0	11,86,952	3.29	16,93,937	0	16,93,937	4.70	1.41
c) Others (specify)									
c i) NRIs	1,88,403	0	1,88,403	0.52	2,05,309	0	2,05,309	0.57	0.05
c ii) Directors & Relatives	1,11,219	7,841	1,19,060	0.33	1,12,019	7,841	1,19,860	0.33	0.00
c iii) NBFC's regd. with RBI	3,085	0	3,085	0.01	311	0	311	0.00	(0.01)
c iv) Clearing Member	3,49,441	0	3,49,441	0.97	4,06,813	0	4,06,813	1.13	0.16
c v) Trusts	500	0	500	0.00	1,700	0	1,700	0.00	0.00
c vi) IEPF	1,27,297	0	1,27,297	0.35	1,41,528	0	1,41,528	0.39	0.39
Sub-Total (B)(2):	86,34,094	3,43,470	89,77,564	24.90	87,90,774	3,14,249	91,05,023	25.26	0.35
Total Public Share holding (B)=(B) (1)+(B)(2)	96,58,655	3,46,220	1,00,04,875	27.75	95,97,876	3,16,999	99,14,875	27.50	(0.25)
C. Shares held by Custodian for GDRs & ADRs	0	0	0	0.00	0	0	0	0.00	0.00
Grand Total (A+B+C)	3,57,03,015	3,46,220	3,60,49,235	100.00	3,57,32,236	3,16,999	3,60,49,235	100.00	(0.00)

ii) Shareholding of Promoters

SI.	Shareholders Name	Shareh	olding as on	01.04.2018	Shareh	olding at on 3	31.03.2019	%
No.		No. of Shares	% of total shares of the Company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total shares of the Company	% of Shares Pledged / encumbered to total shares	change
1	Chhatisgarh Investments Limited	1,37,88,760	38.25	0	1,38,78,760	38.50	0	0.250
2	Sarda Agriculture & Properties Private Limited	26,35,150	7.31	0	26,35,150	7.31	0	0.000
3	Prachi Agriculture & Properties Private limited	15,65,322	4.34	0	15,65,322	4.34	0	0.000
4	G.D. Sarda	13,92,378	3.86	0	13,92,378	3.86	0	0.000
5	Kamal Kishore Sarda	13,09,149	3.63	0	13,09,149	3.63	0	0.000
6	J.K. Sarda	11,72,365	3.25	0	11,72,365	3.25	0	0.000
7	Shakuntala Sarda	10,14,518	2.81	0	10,14,518	2.81	0	0.000
8	Chhatisgarh Investments Limited (Firm)	1,47,731	0.41	0	1,47,731	0.41	0	0.000
9	Veena Sarda	7,02,350	1.95	0	7,02,350	1.95	0	0.000
10	Pankaj Sarda	6,91,107	1.92	0	6,91,107	1.92	0	0.000
11	Premlata Sarda	4,68,910	1.30	0	4,68,910	1.30	0	0.000

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SI.	Shareholders Name	Shareh	olding as on	01.04.2018	Shareh	olding at on 3	31.03.2019	%
No.		No. of	% of total	% of Shares	No. of	% of total	% of Shares	change
		Shares	shares	Pledged /	Shares	shares	Pledged /	
			of the	encumbered		of the	encumbered	
			Company	to total shares		Company	to total shares	
12	Uma Sarda	4,89,425	1.36	0	4,89,425	1.36	0	0.000
13	Dr. K.K. Rathi	6,000	0.02	0	6,000	0.02	0	0.000
14	Manish Sarda	2,37,570	0.66	0	2,37,570	0.66	0	0.000
15	Aditya Sarda	1,12,840	0.31	0	1,12,840	0.31	0	0.000
16	Raghav Sarda	1,12,840	0.31	0	1,12,840	0.31	0	0.000
17	Neeraj Sarda	98,490	0.27	0	98,490	0.27	0	0.000
18	Anant Sarda	49,140	0.14	0	49,140	0.14	0	0.000
19	J.K. Sarda (HUF)	21,716	0.06	0	21,716	0.06	0	0.000
20	Shashi Rathi	19,467	0.05	0	19,467	0.05	0	0.000
21	Aditi Sarda	9,132	0.03	0	9,132	0.03	0	0.000
	Total	2,60,44,360	72.247	0	2,61,34,360	72.496	0	0.250

iii) Change in Promoters' Shareholding (Please specify, if there is no change)

SI. No.	Name		Shareh (Beginning o		Transact	tions during	the year	Cumul shareholdi the y	ng during
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
			Shares	shares			shares		shares
1	Chhatisgarh	At the beginning of the year	1,37,88,760	38.25					
	Investments	Datewise Increase/Decrease			20.06.2018	Puchase	90,000	1,38,78,760	38.50
	Limited	in Shareholding during the							
		year specifying the reasons							
		for increase/decrease (e.g.							
		allotment/ transfer/bonus/							
		sweat equity etc):							
		At the end of the year	1,38,78,760	38.50					
2	Sarda	At the beginning of the year	26,35,150	7.31					
	Agriculture	Datewise Increase/Decrease							
	&	in Shareholding during the							
	Properties	year specifying the reasons			NIL			NIL	
	Private	for increase/decrease (e.g.			INIL			INIL	
	Limited	allotment/ transfer/bonus/							
		sweat equity etc):							
		At the end of the year	26,35,150	7.31					
3	Prachi	At the beginning of the year	15,65,322	4.34					
	Agriculture	Datewise Increase/Decrease							
	&	in Shareholding during the							
	Properties	year specifying the reasons			NIL			NIL	
	Private	for increase/decrease (e.g.			INIL			INIL	
	Limited	allotment/ transfer/bonus/							
		sweat equity etc):							
		At the end of the year	15,65,322	4.34					







SI. No.	Name		Shareh (Beginning o	of the year)	Transac	tions during	-	Cumul shareholdi the y	ng during ear
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
4	Ghanshyam Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	13,92,378	3.86	NIL			NIL	
5	Kamal Kishore Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	13,09,149	3.63	NIL			NIL	
6	J. K. Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):	11,72,365	3.25	NIL			NIL	
	Chalustala	At the end of the year	11,72,365	3.25					
7	Shakuntala Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):	10,14,518	2.81	NIL			NIL	
	Chhatisaarb	At the end of the year	10,14,518	2.81					
8	Chhatisgarh Investments Limited (Firm)	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	1,47,731	0.41	NIL			NIL	

SI. No.	Name		Shareh (Beginning o	of the year)		tions during		Cumul shareholdi the y	ng during ear
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
9	Veena Sarda	At the beginning of the year	7,02,350	1.95					
		Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):			NIL			NIL	
	D 1 :	At the end of the year	7,02,350	1.95					
10	Pankaj Sarda	At the beginning of the year	6,91,107	1.92					
		Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):			NIL			NIL	
		At the end of the year	6,91,107	1.92					
11	Premlata Sarda	At the beginning of the year	4,68,910	1.30					
		Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):			NIL			NIL	
		At the end of the year	4,68,910	1.30					
12	Uma Sarda	At the beginning of the year	4,89,425	1.36					
		Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):			NIL			NIL	
		At the end of the year	4,89,425	1.36					
13	Dr. K.K. Rathi	At the beginning of the year	6,000	0.02					
		Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	6,000	0.02	NIL			NIL	







SI. No.	Name		(Beginning o	Shareholding Transactions during the year (Beginning of the year)		Cumul shareholdi the y	ng during ear		
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
14	Manish	At the beginning of the year	2,37,570	0.66					
	Sarda	Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):			NIL			NIL	
	A 11:	At the end of the year	2,37,570	0.66					
15	Aditya Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	1,12,840	0.31	NIL			NIL	
16	Raghav	At the beginning of the year	1,12,840	0.31					
	Sarda	Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):	1 42 040	0.21	NIL			NIL	
	A1 .	At the end of the year	1,12,840	0.31					
17	Neeraj Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc):	98,490	0.27	NIL			NIL	
	A	At the end of the year	98,490	0.27					
18	Anant Sarda	At the beginning of the year Datewise Increase/Decrease in Shareholding during the year specifying the reasons for increase/decrease (e.g. allotment/ transfer/bonus/ sweat equity etc): At the end of the year	49,140	0.14	NIL			NIL	

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SI. No.	Name		Shareh (Beginning o	of the year)	Transactions during the year		Cumul shareholdi the y	ng during	
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
19	J.K. Sarda	At the haginning of the year	Shares	shares 0.06			shares		shares
19	(HUF)	At the beginning of the year	21,716	0.06					
	(пог)	Datewise Increase/Decrease in Shareholding during the							
		year specifying the reasons							
		for increase/decrease (e.g.			NIL			NIL	
		allotment/ transfer/bonus/							
		sweat equity etc):							
		At the end of the year	21,716	0.06					
20	Shashi Rathi	At the beginning of the year	19,467	0.05					
		Datewise Increase/Decrease							
		in Shareholding during the							
		year specifying the reasons			NIL			NIL	
		for increase/decrease (e.g.			INIL			INIL	
		allotment/ transfer/bonus/							
		sweat equity etc):							
		At the end of the year	19,467	0.05					
21	Aditi Sarda	At the beginning of the year	9,132	0.03					
		Datewise Increase/Decrease							
		in Shareholding during the							
		year specifying the reasons			NIL			NIL	
		for increase/decrease (e.g.							
		allotment/ transfer/bonus/							
		sweat equity etc):	0.122	0.02					
		At the end of the year	9,132	0.03					

iv) Shareholding Pattern of Top Ten Shareholders (Other than Directors, Promoters and Holders of GDRs and ADRs)

SI. No.	Name		Shareholding (Beginning of the year)		Transactions during the year			Cumulative shareholding during the year	
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
1	Asia Minerals	At the beginning of the year	16,84,891	4.67					
	Limited	Datewise Increase/			25.05.2018	Sale	(1,25,000)	15,59,891	4.33
		Decrease in Shareholding			01.06.2018	Sale	(1,35,000)	14,24,891	3.95
		during the year specifying			08.06.2019	Sale	(3,40,000)	10,84,891	3.01
		the reasons for increase/			22.02.2019	Sale	(4,00,000)	6,84,891	1.90
	decrease (e.g. allotment/ transfer/bonus/sweat equity etc):								
		At the end of the year	6,84,891	1.90					







SI. No.	Name			olding of the year)	Transac	tions during t	he year	Cumulative s	_
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
			Shares	shares			shares		shares
2	Fortune	At the beginning of the year	2,74,528	0.76					
	Couriers Limited	Datewise Increase/			31.08.2018	Sale	(10,000)	2,64,528	0.73
		Decrease in Shareholding			02.11.2018	Sale	(5,000)	2,59,528	0.72
		during the year specifying			29.03.2019	Purchase	13,498	2,73,026	0.76
		the reasons for increase/					•		
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):	2 72 22	0.76					
	B 1711	At the end of the year	2,73,026	0.76					
3	Pratibha	At the beginning of the year	2,63,861	0.73	22.05.2040		(00.000)	4 70 004	0.40
	Endeavor Private Limited	Datewise Increase/			22.06.2018	Sale	(90,000)	1,73,861	0.48
	Frivate Limited	Decrease in Shareholding during the year specifying							
		the reasons for increase/							
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	1,73,861	0.48					
4	Acadian	At the beginning of the year	2,17,272	0.60					
	Emerging Markets Small	Datewise Increase/	, ,		25.05.2018	Sale	(6,176)	2,11,096	0.59
		Decrease in Shareholding			15.06.2018	Purchase	5,799	2,16,895	0.60
	Cap Equity Fund	during the year specifying							
	LLC	the reasons for increase/							
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):	2.46.005	0.00					
	The Board of	At the end of the year	2,16,895	0.60					
5	Regents of the	At the beginning of the year Datewise Increase/	1,67,325	0.46	18.05.2018	Cala	(0.102)	1 [0 1/2	0.44
	University of	Decrease in Shareholding			15.06.2018		(9,182)	1,58,143	
	Texas System	during the year specifying					8,481	1,66,624	0.46
	Acadian Asset	the reasons for increase/			22.06.2018	Purchase	7,579	1,74,203	0.48
	Management	decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	1,74,203	0.48					
6	Ajay	At the beginning of the year	1,38,000	0.38					
	Natwarlal	Datewise Increase/			05.10.2018	Purchase	3,000	1,41,000	0.39
	Vora*	Decrease in Shareholding							
	13015200	during the year specifying							
	00153044	the reasons for increase/							
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):	1 44 000	0.20					
		At the end of the year	1,41,000	0.39					

SI.	Name		Shareh		Transac	tions during t	the year	Cumulative s	_
No.			(Beginning	of the year)				during th	ne year
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
			Shares	shares			shares		shares
7	Prabhudas	At the beginning of the year	1,20,766	0.34					
	Liladhar Private	Datewise Increase/			06.04.2018	 	(2,003)	1,18,763	0.33
	Limited*	Decrease in Shareholding			13.04.2018	 	(2,243)	1,16,520	0.32
		during the year specifying			20.04.2018		1,887	1,18,407	0.33
		the reasons for increase/			27.04.2018		(2,902)	1,15,505	0.32
		decrease (e.g. allotment/ transfer/bonus/sweat			04.05.2018	Sale	(490)	1,15,015	0.32
		equity etc):			11.05.2018		(264)	1,14,751	0.32
		equity etc):			18.05.2018	Purchase	1,697	1,16,448	0.32
					25.05.2018		5,125	1,21,573	0.34
					01.06.2018		2,059	1,23,632	0.34
					08.06.2018	 	659	1,24,291	0.34
					15.06.2018	 	45	1,24,336	0.34
					22.06.2018	 	1,860	1,26,196	0.35
					29.06.2018	<u> </u>	8,251	1,34,447	0.37
					06.07.2018		1,069	1,35,516	0.38
					13.07.2018		(810)	1,34,706	0.37
					20.07.2018	 	(1,197)	1,33,509	0.37
					27.07.2018	 	4,373	1,37,882	0.38
					03.08.2018		(6,100)	1,31,782	0.37
					10.08.2018		(1,355)	1,30,427	0.36
					17.08.2018		(7,115)	1,23,312	0.34
					24.08.2018		(20,852)	1,02,460	0.28
					31.08.2018		(1,901)	1,00,559	0.28
					07.09.2018		(8,886)	91,673	0.25
					14.09.2018	 	2,973	94,646	0.26
					21.09.2018		2,813	97,459	0.27
					28.09.2018	<u> </u>	(3,162)	94,297	0.26
					05.10.2018		(355)	93,942	0.26
					12.10.2018	<u> </u>	(294)	93,648	0.26
					19.10.2018		(560)	93,088	0.26
					26.10.2018	-	1,050	94,138	0.26
					02.11.2018	<u> </u>	(1,075)	93,063	0.26
					09.11.2018	 	(9,322)	83,741	0.23
					16.11.2018		1,950	85,691	0.24
					23.11.2018	 	(6,186)	79,505	0.22
					30.11.2018	 	(720)	78,785	0.22
					07.12.2018	<u> </u>	(3,906)	74,879	0.21
					14.12.2018		2,013	76,892	0.21
					21.12.2018		(4,072)	72,820	0.20
					28.12.2018		(1,882)	70,938	0.20
					31.12.2018	1	(922)	70,016	0.19
					04.01.2019	 	(1,204)	68,812	0.19
					11.01.2019		3,211	72,023	0.20
					18.01.2019	<u> </u>	(4,111)	67,912	0.19
					25.01.2019	Sale	(686)	67,226	0.19







SI.	Name			nolding	Transac	tions during	the year	Cumulative shareholding		
No.			(Beginning	of the year)				during t	he year	
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total	
			Shares	shares			shares		shares	
					01.02.2019		688	67,914	0.19	
					08.02.2019		727	68,641	0.19	
					15.02.2019	-	(1,793)	66,848	0.19	
					01.03.2019		83	66,931	0.19	
					08.03.2019		787	67,718	0.19	
					15.03.2019		1,450	69,168	0.19	
					22.03.2019		(1,850)	67,318	0.19	
					29.03.2019	Sale	(2,741)	64,577	0.18	
		At the end of the year	64,577	0.18						
8	Pension	At the beginning of the year	1,06,044	0.29						
	Reserves	Datewise Increase/			08.06.2018	Purchase	9,831	1,15,875	0.32	
	Investment	Decrease in Shareholding								
	Trust Fund -	during the year specifying								
	Acadian*	the reasons for increase/								
		decrease (e.g. allotment/ transfer/bonus/sweat								
		equity etc):								
		At the end of the year	1,15,875	0.32						
9	Suresh Bhatia*	At the beginning of the year	1,05,000	0.32						
9	Julesii bilatia	Datewise Increase/	1,03,000	0.23	25.05.2018	Salo	(5,000)	1,00,000	0.28	
		Decrease in Shareholding			08.06.2018		(1,038)	98,962	0.28	
		during the year specifying			03.08.2018		(29,998)	68,964	0.19	
		the reasons for increase/			28.09.2018		(4,940)	64,024	0.19	
		decrease (e.g. allotment/			05.10.2018		(1,500)	62,524	0.18	
		transfer/bonus/sweat			12.10.2018		(2,500)	60,024	0.17	
		equity etc):			19.10.2018		(60,000)	24	0.00	
		At the end of the year	24	0.00	19.10.2016	Jale	(00,000)	24	0.00	
10	Prachi Sarda*	At the beginning of the year	70,842	0.20	NIL			NIL		
10	Flacili Salua	Datewise Increase/	70,042	0.20	INIL			IVIL		
		Decrease in Shareholding								
		during the year specifying								
		the reasons for increase/								
		decrease (e.g. allotment/								
		transfer/bonus/sweat								
		equity etc):								
		At the end of the year	70,842	0.20						
11	Pace Stock	At the beginning of the year	2,350	0.01						
	Broking	Datewise Increase/			20.04.2018	Sale	(2,000)	350	0.00	
	Services Private	Decrease in Shareholding			18.05.2018	Purchase	100	450	0.00	
	Limited	during the year specifying			25.05.2018	Purchase	1,000	1,450	0.00	
		the reasons for increase/			01.06.2018	Sale	(1,000)	450	0.00	
		decrease (e.g. allotment/			15.06.2018	Sale	(22)	428	0.00	
		transfer/bonus/sweat equity etc):			22.06.2018	Sale	(3)	425	0.00	
		equity etc).			13.07.2018	Purchase	702	1,127	0.00	
					20.07.2018	Sale	(702)	425	0.00	
					17.08.2018	Sale	(200)	225	0.00	

SI. No.	Name			nolding of the year)	Transac	tions during	the year	Cumulative sl during tl	
NO.						_		_	
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
			Shares	shares	07.00.2040		shares	775	shares
					07.09.2018	<u> </u>	550	775	0.00
					14.09.2018		(75)	700	0.00
					16.11.2018	<u> </u>	(525)	175	0.00
					23.11.2018		75	250	0.00
					30.11.2018	 	105	355	0.00
					07.12.2018	 	(105)	250	0.00
					21.12.2018		(50)	200	0.00
					18.01.2019		25	225	0.00
					25.01.2019	Sale	(25)	200	0.00
					08.02.2019	Purchase	95	295	0.00
					15.02.2019		(95)	200	0.00
					22.02.2019	Purchase	4,00,000	4,00,200	1.11
					01.03.2019	Sale	(2,00,000)	2,00,200	0.56
					08.03.2019	Purchase	23	2,00,223	0.56
					15.03.2019	Sale	(23)	2,00,200	0.56
					22.03.2019	Purchase	60	2,00,260	0.56
					29.03.2019	Purchase	50	2,00,310	0.56
		At the end of the year	2,00,310	0.56					
12	Mahima Stocks	At the beginning of the year	0	0.00					
	Private Limited	Datewise Increase/			01.03.2019	Purchase	2,00,000	2,00,000	0.55
		Decrease in Shareholding							
		during the year specifying							
		the reasons for increase/							
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	2,00,000	0.55					
13	Pankaj Jalan	At the beginning of the year	0	0.00					
		Datewise Increase/			24.08.2019	-	1,58,928	1,58,928	0.44
		Decrease in Shareholding			19.10.2018	Purchase	26,072	1,85,000	0.51
		during the year specifying							
		the reasons for increase/ decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	1,85,000	0.51					
14	Parwati Devi	At the beginning of the year	0	0.00					
14	Jalan	Datewise Increase/	0	0.00	24.08.2018	Durchaco	1,30,000	1,30,000	0.36
	Jaian	Decrease in Shareholding			11.01.2019	 	13,315	1,43,315	0.40
		during the year specifying							
		the reasons for increase/			18.01.2019	 	22,334	1,65,649	0.46
		decrease (e.g. allotment/			25.01.2019		5,606	1,71,255	0.48
		transfer/bonus/sweat			08.02.2019	Purchase	10,358	1,81,613	0.50
		equity etc):							
		At the end of the year	1,81,613	0.50					

to the directors' report

SI. No.	Name		Shareholding (Beginning of the year)		Transac	tions during t	the year	Cumulative shareholding during the year	
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
15	Niraj Jalan	At the beginning of the year	0	0.00					
		Datewise Increase/ Decrease in Shareholding during the year specifying the reasons for increase/ decrease (e.g. allotment/ transfer/bonus/sweat equity etc): At the end of the year	1,60,000	0.44	24.08.2018	Purchase	1,60,000	1,60,000	0.44

^{*}Among top 10 as on 31.03.2018

v) Shareholding of Directors and Key Managerial Personnel

SI. No.	Name		Shareh (Beginning	olding of the year)	Transac	tions during	the year	Cumulative s during t	_
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total
			Shares	shares			shares		shares
1	Kamal Kishore	At the beginning of the year	13,09,149	3.63					
	Sarda	Datewise Increase/							
		Decrease in Shareholding							
		during the year specifying			NA			NA NA	
		the reasons for increase/			IVA			I IVA	
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	13,09,149	3.63					
2	Pankaj Sarda	At the beginning of the year	6,91,107	1.92					
		Datewise Increase/							
		Decrease in Shareholding			NA				
		during the year specifying						NA NA	
		the reasons for increase/			1071			14/1	
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	6,91,107	1.92					
3	Uma Sarda	At the beginning of the year	4,89,425	1.36					
		Datewise Increase/							
		Decrease in Shareholding							
		during the year specifying			NA			NA NA	
		the reasons for increase/						107	
		decrease (e.g. allotment/							
		transfer/bonus/sweat							
		equity etc):							
		At the end of the year	4,89,425	1.36					

SI.	Name		Shareh	olding	Transac	tions during	the year	Cumulative s	hareholding	
No.			(Beginning	of the year)				during the year		
			No. of	% of total	Date	Reason	No. of	Cumulative	% of total	
			Shares	shares			shares		shares	
4	C.K.	At the beginning of the year	8,000	0.02						
	Lakshmi	Datewise Increase/								
	narayanan	Decrease in Shareholding								
		during the year specifying								
		the reasons for increase/				NA		N	A	
		decrease (e.g. allotment/								
		transfer/bonus/sweat equity etc):								
		At the end of the year	8,000	0.02						
	A.K. Basu	At the beginning of the year	4,000	0.02						
J	A.K. Dasu	Datewise Increase/	4,000	0.01						
		Decrease in Shareholding								
		during the year specifying								
		the reasons for increase/				NA		N	A	
		decrease (e.g. allotment/								
		transfer/bonus/sweat								
		equity etc):								
		At the end of the year	4,000	0.01						
6	G.S. Sahni	At the beginning of the year	3,500	0.01						
		Datewise Increase/								
		Decrease in Shareholding								
		during the year specifying								
		the reasons for increase/				NA		N	A	
		decrease (e.g. allotment/ transfer/bonus/sweat								
		equity etc):								
		At the end of the year	3,500	0.01						
7	J. Balakrishnan	At the beginning of the year	1,667	0.00						
,	3. Balaki isinian	Datewise Increase/	2,007	0.00						
		Decrease in Shareholding								
		during the year specifying								
		the reasons for increase/				NA		N	A	
		decrease (e.g. allotment/								
		transfer/bonus/sweat								
		equity etc):				T	ı			
		At the end of the year	1,667	0.00						
8	Rakesh Mehra	At the beginning of the year	9,737	0.03						
		Datewise Increase/			24.08.2018		650	10387	0.03	
		Decrease in Shareholding			31.08.2018	+	(150)	10237	0.03	
		during the year specifying			07.09.2018	Purchase	300	10537	0.03	
		the reasons for increase/ decrease (e.g. allotment/								
		transfer/bonus/sweat								
		equity etc):								
		At the end of the year	10,537	0.03						







SI. No.	Name			olding of the year)	Transac	tions during	the year		hareholding he year
			No. of Shares	% of total shares	Date	Reason	No. of shares	Cumulative	% of total shares
9	P.R. Tripathi*	At the beginning of the year	0	0.00					
		Datewise Increase/ Decrease in Shareholding during the year specifying the reasons for increase/ decrease (e.g. allotment/ transfer/bonus/sweat				NA		N	A
		equity etc):	0	0.00					
* rot	l tired w.e.f. 1st Apri	At the end of the year	0	0.00					
10	P.K. Jain	·	10,073	0.03				1	
10	(WTD & CFO)	At the beginning of the year Datewise Increase/	10,073	0.03					
		Decrease in Shareholding during the year specifying the reasons for increase/ decrease (e.g. allotment/ transfer/bonus/sweat equity etc):				NA		N	A
		At the end of the year	10,073	0.03					
11	Manish Sethi	At the beginning of the year	1,680	0.00					
	(CS)	Datewise Increase/ Decrease in Shareholding during the year specifying the reasons for increase/ decrease (e.g. allotment/ transfer/bonus/sweat equity etc):				NA		N	A
		At the end of the year	1,680	0.00					

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V. Indebtedness

Indebtedness of the Company including interest outstanding/accrued but not due for payment

(₹ in lakh)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	28,545.52	4,000.00	-	32,545.52
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	81.79		-	81.79
Total (i+ii+iii)	28,627.31	4,000.00	-	32,627.31
Change in Indebtedness during the financial year				
Addition	4,134.49	1,300.00	-	5,434.49
Reduction	(8,538.78)	-	-	(8,538.78)
Net Change	(4,404.29)	1,300.00	-	(3,104.29)
Indebtedness at the end of the financial year				
i) Principal Amount	24,189.63	5,300.00	-	29,489.63
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	33.39		-	33.39
Total (i+ii+iii)	24,223.02	5,300.00	-	29,523.02

VI. Remuneration of Directors and Key Managerial Personnel

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

(₹ in lakh)

SI.	Particulars of Remuneration	Name	Total Amount		
No.		Mr. K. K. Sarda	Mr. Pankaj Sarda	Mr. P. K. Jain (WTD & CFO)	
1	Gross Salary				
	(a) Salary as per provisions contained in Section 17(1) of the Income Tax Act, 1961	141.36	65.84	51.06	258.26
	(b) Value of perquisites under Section 17(2) Income Tax Act, 1961	0.40	0.29	0.29	0.98
	(c) Profits in lieu of salary under Section 17(3) Income Tax Act, 1961	-	-	-	-
2	Stock Options	-	-	-	_
3	Sweat Equity	-	1	1	-
4	Commission				
	a) as % of profit	350.00	100.00	-	450.00
	b) others, specify	-	-	-	-
5	Others, please specify (PF/Superannuation)	17.34	5.10	4.03	26.47
	Total (A)	509.10	171.23	55.38	735.71
	Ceiling as per the Act	10% of the net profits of the Company.			







to the directors' report

B. Remuneration to other Directors:

(₹ in lakh)

SI.	Particulars of Remuneration	Name of Director						Total	
No.		Mrs. Uma Sarda	Mr. C.L. Lakshmi- narayanan	Mr. A.K. Basu	Mr. Rakesh Mehra	Mr. P.R. Tripathi	Mr. G.S. Sahni	Mr. J. Bala- krishnan	
1.	Independent Directors:								
a)	Fee for attending board / committee meetings	-	1.40	2.90	1.20	1.30	1.60	3.40	11.80
b)	Commission	-	3.00	3.00	3.00	3.00	3.00	3.00	18.00
c)	Others, please specify (Stock option)	-	-	-	-	-	-	-	-
	Total (1)	-	4.40	5.90	4.20	4.30	4.60	6.40	29.80
2.	Other Non Executive Directors								
a)	Fee for attending board committee meetings	1.20	-	-	-	-	-	-	1.20
b)	Commission	-	-	-	-	-	-	-	-
c)	Others, please specify	-	-	1	-	-	-	-	-
	Total (2)	1.20	•	-	-	-	-	-	1.20
	Total (B) = (1+2)	1.20	4.40	5.90	4.20	4.30	4.60	6.40	31.00
	Total Managerial Remuneration^								766.71
	Overall Ceiling as per the Act	verall Ceiling as per the Act 11% of the net profits of the Company							

[^] Total remuneration to Managing Director, Whole-Time Directors and other Directors (being the total of A and B).

C. Remuneration to Key Managerial Personnel other than MD/Manager/WTD:

(₹ in lakh)

SI. No.	Particulars of Remuneration	Key Managerial Personnel \$ Company Secretary	Total
1	Gross Salary		
	(a) Salary as per provisions contained in Section 17(1) of the Income Tax Act, 1961	13.33	13.33
	(b) Value of perquisites under Section 17(2) Income Tax Act, 1961	0.00	0.00
	(c) Profits in lieu of salary under Section 17(3) Income Tax Act, 1961	0.00	0.00
2	Stock Options	0.00	0.00
3	Sweat Equity	0.00	0.00
4	Commission		
	a) as % of profit	0.00	0.00
	b) others, specify	0.00	0.00
5	Others, please specify (PF/Superannuation)	0.46	0.46
	Total	13.79	13.79

^{\$} Details of remuneration of CFO - Mr. P.K. Jain appears along with the details of remuneration of Wholetime Directors as he also is a Whole time Director

to the directors' report

VII. Penalties / Punishment / Compounding of Offences

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