

1. Name of Listed Entity:Vardhman Special Steels Limited
2. Scrip Code/Name of Scrip/Class of Security: VSSL
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on : 30-Jun-2021
5. **Declaration:** The Listed entity is required to submit the following declaration to the extent of submission of information:-

| S. No. | Particulars | Yes/No | |
|--------|--|--------|--|
| 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 any shares against which depository receipts are issued? | No | |
| 4 | Whether the Listed Entity has any shares in locked-in? | No | |
| 5 | Whether any shares held by promoters are pledge or otherwise encumbered? | No | |
| 6 | Whether the Listed Entity has issued any differential Voting Rights? | No | |
| 7 | Whether the Listed Entity has issued any Warrants ? | 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) | Total nos. shares held (V) | Shareholding as a % of total no. of shares (calculated as per SCRR, 1957) (VII) As a % of (A+B+C2) | Number of Voting Rights held in each class of securities (IX) | | | | Number of equity shares held in Dematerialized form |
|--------------|--------------------------------|----------------------------|--|----------------------------|--|---|---|----------|-------------------------|---|
| | | | | | | No of Voting Rights | | | Total as a % of (A+B+C) | (XIV) |
| | | Class eg: X | | Class eg:y | | Total | | | | |
| | | | | | | | | | | |
| A | Promoter & Promoter Group | 19 | 24654789 | 24654789 | 60.87 | 24654789 | 0 | 24654789 | 60.87 | 24654789 |
| B | Public | 26085 | 15852211 | 15852211 | 39.13 | 15852211 | 0 | 15852211 | 39.13 | 15673930 |
| C | Non Promoter- Non Public | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | 0 |
| C1 | Shares underlying DRs | 0 | 0 | 0 | | 0 | 0 | 0 | 0 | 0 |
| C2 | Shares held by Employee Trusts | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | 26104 | 40507000 | 40507000 | 100 | 40507000 | 0 | 40507000 | 100 | 40328719 |

| | | | | | | | | | | | |
|---|--|----|----------|---|----------|-------|----------|---|----------|-------|----------|
| c | Financial Institutions/ Banks | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| d | Any Other (specify) | 9 | 18578807 | 0 | 18578807 | 45.87 | 18578807 | 0 | 18578807 | 45.87 | 18578807 |
| | Bodies Corporate | 8 | 18045896 | 0 | 18045896 | 44.56 | 18045896 | 0 | 18045896 | 44.56 | 18045896 |
| | DEVAKAR INVESTMENT & TRADING COMPANY PRIVATE LIMITED | 1 | 2215016 | 0 | 2215016 | 5.47 | 2215016 | 0 | 2215016 | 5.47 | 2215016 |
| | FLAMINGO FINANCE & INVESTMENT COMPANY LIMITED | 1 | 196836 | 0 | 196836 | 0.49 | 196836 | 0 | 196836 | 0.49 | 196836 |
| | RAMANIYA FINANCE & INVESTMENT COMPANY LIMITED | 1 | 156676 | 0 | 156676 | 0.39 | 156676 | 0 | 156676 | 0.39 | 156676 |
| | SANTON FINANCE & INVESTMENT COMPANY LIMITED | 1 | 168533 | 0 | 168533 | 0.42 | 168533 | 0 | 168533 | 0.42 | 168533 |
| | MAHAVIR SPINNING MILLS PRIVATE LIMITED | 1 | 3548 | 0 | 3548 | 0.01 | 3548 | 0 | 3548 | 0.01 | 3548 |
| | VARDHMAN HOLDINGS LIMITED | 1 | 5218954 | 0 | 5218954 | 12.88 | 5218954 | 0 | 5218954 | 12.88 | 5218954 |
| | VARDHMAN TEXTILES LIMITED | 1 | 9708333 | 0 | 9708333 | 23.97 | 9708333 | 0 | 9708333 | 23.97 | 9708333 |
| | VTL INVESTMENTS LIMITED | 1 | 378000 | 0 | 378000 | 0.93 | 378000 | 0 | 378000 | 0.93 | 378000 |
| | Other | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | ADISHWAR ENTERPRISES LLP | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Trusts | 1 | 532911 | 0 | 532911 | 1.32 | 532911 | 0 | 532911 | 1.32 | 532911 |
| | MAHAVIR SHARES TRUST (D.C. JAIN, TRUSTEE) | 1 | 532911 | 0 | 532911 | 1.32 | 532911 | 0 | 532911 | 1.32 | 532911 |
| | Sub-Total (A)(1) | 19 | 24654789 | 0 | 24654789 | 60.87 | 24654789 | 0 | 24654789 | 60.87 | 24654789 |
| 2 | Foreign | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| a | Individuals (Non-Resident Individuals/ Foreign Individuals) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| b | Government | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| c | Institutions | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| d | Foreign Portfolio Investor | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| e | Any Other (specify) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Sub-Total (A)(2) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2) | 19 | 24654789 | 0 | 24654789 | 60.87 | 24654789 | 0 | 24654789 | 60.87 | 24654789 |

Table III - Statement showing shareholding pattern of the Public shareholder

| | Category & Name of the Shareholders (I) | Nos. of shareholder (II) | No. of fully paid up equity shares held (III) | Total nos. shares held (IV) | Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (V) | Number of Voting Rights held in each class of securities (IX) | | | | Number of equity shares held in dematerialized form (XIV) |
|---|---|--------------------------|---|-----------------------------|--|---|---------|---------|-------------------------------------|---|
| | | | | | | No of Voting Rights | | | Total as a % of Total Voting rights | |
| | | | | | | Class X | Class Y | Total | | |
| 1 | Institutions | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| a | Mutual Funds/ | 3 | 2262 | 2262 | 0.01 | 2262 | 0 | 2262 | 0.01 | 2262 |
| b | Venture Capital Funds | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| c | Alternate Investment Funds | 2 | 271822 | 271822 | 0.67 | 271822 | 0 | 271822 | 0.67 | 271822 |
| d | Foreign Venture Capital Investors | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| e | Foreign Portfolio Investors | 14 | 301137 | 301137 | 0.74 | 301137 | 0 | 301137 | 0.74 | 301085 |
| f | Financial Institutions/ Banks | 14 | 2142 | 2142 | 0.01 | 2142 | 0 | 2142 | 0.01 | 549 |
| g | Insurance Companies | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| h | Provident Funds/ Pension Funds | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| i | Any Other (specify) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Sub-Total (B)(1) | 33 | 577363 | 577363 | 1.43 | 577363 | 0 | 577363 | 1.43 | 575718 |
| 2 | Central Government/ State Government(s)/ President of India | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Sub-Total (B)(2) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 3 | Non-institutions | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| a | Individuals - | 24951 | 9120345 | 9120345 | 22.52 | 9120345 | 0 | 9120345 | 22.52 | 8949159 |

| | | | | | | | | | | |
|----|---|-------|----------|----------|-------|----------|---|----------|-------|----------|
| i | Individual shareholders holding nominal share capital up to Rs. 2 lakhs. | 24902 | 4968317 | 4968317 | 12.27 | 4968317 | 0 | 4968317 | 12.27 | 4797131 |
| ii | Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs. | 49 | 4152028 | 4152028 | 10.25 | 4152028 | 0 | 4152028 | 10.25 | 4152028 |
| | MUKUL AGRAWAL | 1 | 518638 | 518638 | 1.28 | 518638 | 0 | 518638 | 1.28 | 518638 |
| | ANIL KUMAR GOEL | 1 | 1266000 | 1266000 | 3.13 | 1266000 | 0 | 1266000 | 3.13 | 1266000 |
| | DEEP J MASTER | 1 | 413500 | 413500 | 1.02 | 413500 | 0 | 413500 | 1.02 | 413500 |
| b | NBFCs registered with RBI | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| c | Employee Trusts | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| d | Overseas Depositories (holding DRs) (balancing figure) | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| e | Any Other (specify) | 1101 | 6154503 | 6154503 | 15.19 | 6154503 | 0 | 6154503 | 15.19 | 6149053 |
| | Bodies Corporate | 246 | 5248223 | 5248223 | 12.96 | 5248223 | 0 | 5248223 | 12.96 | 5243010 |
| | Aichi Steel Corporation | 1 | 4629629 | 4629629 | 11.43 | 4629629 | 0 | 4629629 | 11.43 | 4629629 |
| | Clearing Members | 148 | 288887 | 288887 | 0.71 | 288887 | 0 | 288887 | 0.71 | 288887 |
| | HUF | 423 | 468403 | 468403 | 1.16 | 468403 | 0 | 468403 | 1.16 | 468337 |
| | Non-Resident Indian (NRI) | 282 | 148688 | 148688 | 0.37 | 148688 | 0 | 148688 | 0.37 | 148517 |
| | Trusts | 2 | 302 | 302 | 0 | 302 | 0 | 302 | 0 | 302 |
| | Sub-Total (B)(3) | 26052 | 15274848 | 15274848 | 37.71 | 15274848 | 0 | 15274848 | 37.71 | 15098212 |
| | Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3) | 26085 | 15852211 | 15852211 | 39.13 | 15852211 | 0 | 15852211 | 39.13 | 15673930 |

Table V - Statement showing shareholding pattern of the Significant Beneficiary Owner (SBO)

| | Name | Nationality | Details of holding/ exercise of right of the SBO in the reporting company, whether direct or indirect* | | | | | Date of creation / acquisition of significant beneficial interest |
|---|---|-------------|--|---------------|--|---------------------|-----------------------------------|---|
| | | | Shares | Voting rights | Rights on distributable dividend or any other distribution | Exercise of control | Exercise of significant influence | |
| 1 | SAGRIKA JAIN | India | 0.01 | 0 | 0 | | | |
| A | SAGRIKA JAIN | India | 0.01 | | | No | No | 08-Feb-2019 |
| 2 | SUCHITA JAIN | India | 0.22 | 0 | 0 | | | |
| A | SUCHITA JAIN | India | 0.22 | | | No | No | 08-Feb-2019 |
| 3 | SOUMYA JAIN | India | 0.01 | 0 | 0 | | | |
| A | SOUMYA JAIN | India | 0.01 | | | No | No | 08-Feb-2019 |
| 4 | SHAKUN OSWAL | India | 0.13 | 0 | 0 | | | |
| A | SHAKUN OSWAL | India | 0.13 | | | No | No | 08-Feb-2019 |
| 5 | SHRI PAUL OSWAL, SHAKUN OSWAL, SACHIT JAIN, SUCHITA JAIN, SAGRIKA JAIN, SOUMYA JAIN, TOGETHER | India | 33.27 | 0 | 0 | | | |
| A | VARDHMAN HOLDINGS LIMITED | India | 9.65 | | | No | No | 08-Feb-2019 |
| B | DEVAKAR INVESTMENT AND TRADING COMPANY PRIVATE LIMITED | India | 5.47 | | | No | No | 08-Feb-2019 |
| C | FLAMINGO FINANCE AND INVESTMENT COMPANY LIMITED | India | 0.49 | | | No | No | 08-Feb-2019 |
| D | RAMANIYA FINANCE AND INVESTMENT COMPANY LIMITED | India | 0.39 | | | No | No | 08-Feb-2019 |
| E | VARDHMAN TEXTILES LIMITED | India | 15.15 | | | No | No | 08-Feb-2019 |
| F | EASTERN TRADING COMPANY | India | 0.05 | | | No | No | 08-Feb-2019 |
| G | PARAS SYNDICATE | India | 0.08 | | | No | No | 08-Feb-2019 |
| H | MAHAVIR SPINNING MILLS PRIVATE LIMITED | India | 0.01 | | | No | No | 08-Feb-2019 |
| I | AMBER SYNDICATE | India | 0.07 | | | No | No | 08-Feb-2019 |
| J | SANTON FINANCE AND INVESTMENT COMPANY LIMITED | India | 0.42 | | | No | No | 08-Feb-2019 |
| K | MAHAVIR SHARES TRUST | India | 0.83 | | | No | No | 08-Feb-2019 |
| L | NORTHERN TRADING COMPANY | India | 0.07 | | | No | No | 08-Feb-2019 |

| | | | | | | | | |
|---|-------------------------|-------|-------|---|---|----|----|-------------|
| M | VTL INVESTMENTS LIMITED | India | 0.59 | | | No | No | 08-Feb-2019 |
| 6 | SACHIT JAIN | India | 13.83 | 0 | 0 | | | |
| A | SACHIT JAIN | India | 13.83 | | | No | No | 08-Feb-2019 |
| 7 | SHRI PAUL OSWAL | India | 0.54 | 0 | 0 | | | |
| A | SHRI PAUL OSWAL | India | 0.54 | | | No | No | 08-Feb-2019 |

Table II- Unclaim Details

| | |
|--|-------------------------|
| Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc. | |
| No. of shareholders | No of share held |

Table III- Unclaim Details

| | |
|--|-------------------------|
| Details of Shares which remain unclaimed may be given here along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc. | |
| No. of shareholders | No of share held |

Table III- Person in Concert

| | | | |
|---|--------------------|---------------------|------------------|
| Details of the shareholders acting as persons in Concert including their Shareholding | | | |
| Name of shareholder | Name of PAC | No. of share | Holding % |