

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 : 31-Dec-2019
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?	Yes	Public Group
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 share (III)	No. of fully paid up shares held (IV)	No. of Partly equity shares held (V)	No. of shares underlying Depositor Receipts (VI)	Total nos. share held (VII) = (IV)+(V)+(VI)	Shareholding as a % of total no. (calculated per SCRR, 1957) (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 of securities (as percentage diluted share capital) (XI) = $\frac{(X)}{(A+B+C)}$ As a % of (A+B+C2)	Number of Locked (XII)		Number of Shares otherwise encumbered (XIII)		Number of equity shares in dematerialized form (XIV)
								No of Voting			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	19	23821481	0	0	23821481	58.97	23821481	0	23821481	58.97	0	0	0	0	0	23821481	
B	Public	17890	16573021	0	0	16573021	41.03	16573021	0	16573021	41.03	4629629	27.93				16383921	
C	Non Promoter-Non Public	0	0	0	0	0		0	0	0	0	0	0				0	
C1	Shares underlying DRs	0	0	0	0	0		0	0	0	0	0	0				0	
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0				0	
	Total	17909	40394502	0	0	40394502	100	40394502	0	40394502	100	4629629	11.46	0	0	0	40205402	

	PARTNER, AMBER SYNDICATE																			
	SHRI PAUL OSWAL, PARTNER, NORTHERN TRADING COMPANY	AABFN 1477B	1	27520	0	0	27520	0.07	27520	0	27520	0.07	0	0.07	0	0	0	0	0	27520
	SHRI PAUL OSWAL, PARTNER, PARAS SYNDICATE	AABFP 6939L	1	30515	0	0	30515	0.08	30515	0	30515	0.08	0	0.08	0	0	0	0	0	30515
b	Central Government/ State Government(s)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
c	Financial Institutions/ Banks		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
d	Any Other (specify)		9	184940 48	0	0	184940 48	45.78	184940 48	0	184940 48	45.78	0	45.78	0	0	0	0	0	184940 48
	Bodies Corporate		8	1796113 7	0	0	1796113 7	44.47	1796113 7	0	1796113 7	44.47	0	44.47	0	0	0	0	0	1796113 7
	DEVAKAR INVESTMENT & TRADING CO PRIVATE LIMITED	AAACD 1809K	1	221501 6	0	0	221501 6	5.48	221501 6	0	221501 6	5.48	0	5.48	0	0	0	0	0	221501 6
	FLAMINGO FINANCE & INVESTMENT COMPANY LIMITED	AAACF 0061B	1	196836	0	0	196836	0.49	196836	0	196836	0.49	0	0.49	0	0	0	0	0	196836
	RAMANIYA FINANCE & INVESTMENT COMPANY LIMITED	AAACR 0348F	1	156676	0	0	156676	0.39	156676	0	156676	0.39	0	0.39	0	0	0	0	0	156676
	SANTON FINANCE &	AAACS 0994G	1	168533	0	0	168533	0.42	168533	0	168533	0.42	0	0.42	0	0	0	0	0	168533

Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)	19	238214 81	0	0	23821481	58.97	238214 81	0	2382 1481	58.97	0	58.97	0	0	0	0	0	23821481
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Table III - Statement showing shareholding pattern of the Public shareholder

	Category & Name of the Shareholders (I)	PAN (II)	Nos. of shareholder (III)	No. of fully paid up equity shares held	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	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including	Total shareholding, as a % assuming full conversion of convertible	Number of Locked in shares (XII)		Number of Shares pledged or		Number of equity shares held in dematerialized form (XIV)
									No of Voting Rights			Total as a % of Total Voting			No. (a)	As a % of total Shares	No. (Not applicable)	As a % of total shares held	
									Class X	Class Y	Total								
a	Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0			0	
	Mutual Funds/		4	1788262	0	0	1788262	4.43	1788262	0	1788262	4.43	0	4.43	0	0			1788262
	DSP BLACKROCK SMALL CAP FUND	AAAJD0430B	1	1786000	0	0	1786000	4.42	1786000	0	1786000	4.42	0	4.42	0	0			1786000
b	Venture Capital Funds		0	0	0	0	0	0	0	0	0	0	0	0	0			0	
c	Alternate Investment Funds		2	1841268	0	0	1841268	4.56	1841268	0	1841268	4.56	0	4.56	0	0			1841268
	SUNDARAM ALTERNATIVE OPPORTUNITIES FUND NANO CAP SERIES I	AAQAS9168Q	1	1386943	0	0	1386943	3.43	1386943	0	1386943	3.43	0	3.43	0	0			1386943
	SUNDARAM ALTERNATIVE OPPORTUNITIES FUND NANO CAP SERIES II	AARAS9870Q	1	454325	0	0	454325	1.12	454325	0	454325	1.12	0	1.12	0	0			454325
d	Foreign Venture Capital Investors		0	0	0	0	0	0	0	0	0	0	0	0	0			0	
e	Foreign Portfolio Investors		5	728	0	0	728	0	728	0	728	0	0	0	0			676	
f	Financial Institutions/		15	6672	0	0	6672	0.02	6672	0	6672	0.02	0	0.02	0	0			5079

	Depositories (holding DRs) (balancing figure)																		
e	Any Other (specify)		848	552676 3	0	0	5526763	13.68	552676 3	0	5526 763	13.68	0	13.68	46296 29	83.77			5521379
	Bodies Corporate		256	502532 8	0	0	5025328	12.44	502532 8	0	5025 328	12.44	0	12.44	46296 29	92.13			5020115
	Aichi Steel Corporation	AAMC A0319 B	1	462962 9	0	0	4629629	11.46	46296 29	0	4629 629	11.46	0	11.46	46296 29	100			4629629
	Clearing Members		24	18745	0	0	18745	0.05	18745	0	1874 5	0.05	0	0.05	0	0			18745
	Foreign Nationals		1	40	0	0	40	0	40	0	40	0	0	0	0	0			40
	HUF		374	330526	0	0	330526	0.82	330526	0	3305 26	0.82	0	0.82	0	0			330526
	Non-Resident Indian (NRI)		191	148652	0	0	148652	0.37	148652	0	1486 52	0.37	0	0.37	0	0			148481
	Trusts		2	3472	0	0	3472	0.01	3472	0	3472	0.01	0	0.01	0	0			3472
	Sub-Total (B)(3)		17864	129360 91	0	0	12936091	32.02	129360 91	0	1293 6091	32.02	0	32.02	46296 29	35.79			12748636
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B) (3)		17890	165730 21	0	0	16573021	41.03	165730 21	0	1657 3021	41.03	0	41.03	46296 29	27.93			16383921

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

	Name	PAN	Passport No. in case of a foreign national	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	AWBPJ2981L		India	0.01	0	0			
A	SAGRIKA JAIN	AWBPJ2981L		India	0.01			No	No	08-Feb-2019
2	SUCHITA JAIN	ACDPJ8195N		India	0.22	0	0			
A	SUCHITA JAIN	ACDPJ8195N		India	0.22			No	No	08-Feb-2019
3	SOUMYA JAIN	AIAPJ4281G		India	0.01	0	0			
A	SOUMYA JAIN	AIAPJ4281G		India	0.01			No	No	08-Feb-2019
4	SHAKUN OSWAL	AABPO8533H		India	0.13	0	0			
A	SHAKUN OSWAL	AABPO8533H		India	0.13			No	No	08-Feb-2019
5	SHRI PAUL OSWAL, SHAKUN OSWAL, SACHIT JAIN, SUCHITA JAIN, SAGRIKA JAIN, SOUMYA JAIN, TOGETHER	AACPO8405B		India	32.93	0	0			
A	VARDHMAN HOLDINGS LIMITED	AABCV8088P		India	9.52			No	No	08-Feb-2019
B	DEVAKAR INVESTMENT AND TRADING COMPANY PRIVATE LIMITED	AAACD1809K		India	5.48			No	No	08-Feb-2019
C	FLAMINGO FINANCE AND INVESTMENT COMPANY LIMITED	AAACF0061B		India	0.49			No	No	08-Feb-2019
D	RAMANIYA FINANCE AND INVESTMENT	AAACR0348F		India	0.39			No	No	08-Feb-2019

	COMPANY LIMITED									
E	VARDHMAN TEXTILES LIMITED	AABCM4692E		India	14.95			No	No	08-Feb-2019
F	EASTERN TRADING COMPANY	AAAFE8150D		India	0.05			No	No	08-Feb-2019
G	PARAS SYNDICATE	AABFP6939L		India	0.08			No	No	08-Feb-2019
H	MAHAVIR SPINNING MILLS PRIVATE LIMITED	AAACV5455B		India	0.01			No	No	08-Feb-2019
I	AMBER SYNDICATE	AAJFA0521H		India	0.07			No	No	08-Feb-2019
J	SANTON FINANCE AND INVESTMENT COMPANY LIMITED	AAACS0994G		India	0.42			No	No	08-Feb-2019
K	MAHAVIR SHARES TRUST	AABTM5461E		India	0.82			No	No	08-Feb-2019
L	NORTHERN TRADING COMPANY	AABFN1477B		India	0.07			No	No	08-Feb-2019
M	VTL INVESTMENTS LIMITED	AABCV7449L		India	0.58			No	No	08-Feb-2019
6	SACHIT JAIN	ACDPJ8194P		India	12.02	0	0			
A	SACHIT JAIN	ACDPJ8194P		India	12.02			No	No	08-Feb-2019
7	SHRI PAUL OSWAL	AACPO8405B		India	0.55	0	0			
A	SHRI PAUL OSWAL	AACPO8405B		India	0.55			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 %