

CIN: L17300DL1995PLC107286

Registered & Corporate Office: A-48, 1st Floor, Wazirpur Industrial Area, Delhi-110052 E-mail: srusteels@yahoo.in, Website: www.srusteels.in Tel: 011-27373622

Dated: May 11, 2020

SRU/CS/2020-21/153

To,

The Manager,

Listing Department

BSE Limited

Phiroze Jeejeebhoy Towers,

Dalal Street, Mumbai -400001

Sub: Submission of Shareholding Pattern for the Quarter and Year ended 31st March 2020 under Regulation 31 of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015.

Dear Sir,

With reference to the above captioned matter, we do hereby submit the shareholding Pattern for the Quarter ended March 31, 2020 as per Regulation 31 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015.

Kindly take the letter in your official record and do the needful.

Thanking You

For SRU STEELS LIMITED

Shallu Garg

Shallu

Company Secretary

Encl: As above

SHAREHOLDING PATTERN AS ON 31/03/2020

Table - I Summary Statement holding of specified securities

| Category (I) | Category of Shareholder (II) | No of Shareholders (III) | No. of fully paid Equity Share Held (IV) | No. Of Partly Paid 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) | No of Voting Rights held in each class of | | | No of shares undelying undelying outstanding convertible securities (including warrants) (X) Shareholding as a % assuming full convertible securities (as a % of diluted equity capital) (XI)=VII+X as a % of (A+B+C2) | | | ocked in es (XII) | No of Shares pledged or otherwise encumbered (XIII | | No of Equity Shares Held in Dematerializ ed form (XIV) | |
|--------------|--------------------------------|--------------------------------|---|--|---|--|---|---|---------|---------|--|---|----------|----------------------|---|---------|--|---------|
| | | | | | | | | Class X | Class Y | Total | 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) | |
| (A) | Promoter & Promoter Group | 1 | 1547000 | 0 | 0 | 1547000 | 19.3571 | 1547000 | 0 | 1547000 | 19.3571 | 0 | 19.3571 | 0 | 0.0000 | 0 | 0.0000 | 1547000 |
| (B) | Public | 169 | 6444900 | 0 | 0 | 6444900 | 80.6429 | 6444900 | 0 | 6444900 | 80.6429 | 0 | 80.6429 | 0 | 0.0000 | 0 | 0.0000 | 5209700 |
| (C) | Non Promoter - Non Public | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (C1) | Shares Underlying DRs | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (C2) | Share Held By Employees Trusts | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| | Total | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | | 0.0000 | | 0.0000 | 0 | 0.0000 | |
| | Total A+B+C1+C2 | 170 | 7991900 | 0 | 0 | 7991900 | 100.0000 | 7991900 | 0 | 7991900 | 100.0000 | 0 | 100.0000 | 0 | 0.0000 | 0 | 0.0000 | 6756700 |

SHAREHOLDING PATTERN AS ON 31/03/2020

Table - II Statement showing shareholding pattern of the Promoter and Promer Group

| S.No. | Category & Name of the Shareholder (I) | PAN (II) | No of | No. of fully paid Equity Share Held (IV) | No. Of Partly Paid 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) | No of Voting Rights held in each class of securities (IX) | | | Shareholding as a % assuming full convertions of convertible securities (as a % of diluted equity capital) (XI)=VII+X as a % of (A+B+C2) | | No. of Locked in Shares (XII) | | ed or wise | No of Equity Shares Held in Dematerializ ed form (XIV) | |
|-------|--|------------|-------|---|--|---|---|---|---|---------|---------|---|---------|----------------------------------|--|---------------|--|---------|
| | | | | | | | | | Class X | Class Y | Total | 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) | |
| (1) | Indian | | | | | | | | | | | | | | | | | |
| (a) | Individual | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (b) | Huf | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (c) | Central Govt /state Govt/ President Of India | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (d) | Financial Inst/banks | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (e) | Any other | | | | | | | | | | | | | | | | | |
| | Other - Body Corporate | | 1 | 1547000 | 0 | 0 | 1547000 | 19.3571 | 1547000 | 0 | 1547000 | 19.3571 | 19.3571 | 0 | 0.0000 | 0 | 0.0000 | 1547000 |
| | M M Fiscal Services Private Limited | AAACM0850D | | 1547000 | 0 | 0 | 1547000 | 19.3571 | 1547000 | 0 | 1547000 | 19.3571 | 19.3571 | 0 | 0.0000 | 0 | 0.0000 | 1547000 |
| | Sub - Total | | 1 | 1547000 | 0 | 0 | 1547000 | 19.3571 | 1547000 | 0 | 1547000 | 19.3571 | 19.3571 | 0 | 0.0000 | 0 | 0.0000 | 1547000 |
| (2) | Foreign | | | | | | | | | | | | | | | | | |
| (a) | Individual(nri/ Foriegn Individual) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (b) | Government | | 0 | 0 | 0 | 0 | 0 | 0.0000 | | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (c) | Institutions | | 0 | 0 | 0 | 0 | 0 | 0.0000 | | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (d) | Foreign Portfolio Investor | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (e) | Any Other | | | | | | | | | | | | | | | | | |
| | Sub - Total | | 0 | 0 | 0 | 0 | 0 | 0.0000 | | 0 | 0 | 0.0000 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| | Total Shareholding of Promoter and Promotor Grou | р | 1 | 1547000 | 0 | 0 | 1547000 | 19.3571 | 1547000 | 0 | 1547000 | 19.3571 | 19.3571 | 0 | 0.0000 | 0 | 0.0000 | 1547000 |
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SHAREHOLDING PATTERN AS ON 31/03/2020

Table - III Statement showing shareholding pattern of the Public shareholding

| S.No. | Category & Name of the Shareholder (I) | PAN (II) | No of Sharehold ers (III) | No. of fully paid Equity Share Held (IV) | No. Of Partly Paid Equity Shares Held (V) | No . Of shares underlying Depository Receipts (VI) | Total Nos. Shares Held (VII) = IV+V+VI | Shareholdin g as a % of total no of Shares (calculated as per SCRR 1957) (VIII) as a % of (A+B+C2) | No of Voting Rights held in each class of securities (IX) | | | No of shares undelying outstanding convertible securities (including warrants) (X) Shareholding as a % assuming full convertions of convertible securities (as a % of diluted equity capital) (XI)=VII+X as a % of (A+B+C2) | | as a % assuming full convertions of convertible securities (as a % of diluted equity capital) (XI)=VII+X as a % of (A+B+C2) | | otherwise encumbered (XIII | | No of Equity Shares Held in Dematerial ized form (XIV) | |
|-------|---|------------|---------------------------------|--|--|---|---|--|---|---------|---------|--|---|---|----------|--|---------|--|---------|
| | | | | | | | | | Class X | Class Y | Total | 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) | |
| (1) | Institutions | | | | | | | | | | | | | | | ileiu (b) | | neia (b) | |
| (a) | Mutual Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (b) | Venture Capital Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (c) | Alternate Investment Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | | 0 |
| (d) | Foreign Venture Capital Investors | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (e) | Foreign Portfolio Investros | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (f) | Financial Inst/banks | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (g) | Insurance Companies | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (h) | Provident Funds/ Pension Fund | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (i) | Any other | | | | | | | | | | | | | | | | | | |
| ,, | Sub-total (B)(1) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (2) | Central Govt /state Govt/ President Of India | 1 | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| , , | Sub-total (B)(2) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (3) | Non-institutions | | | | | | | | | | | | | | | | | | |
| (a) | (i) Individual-Holding Nom. Val. upto Rs.2 la | akhs | 107 | 303386 | 0 | 0 | 303386 | 3.7962 | 303386 | 0 | 303386 | 3.7962 | 0 | 3.7962 | 0 | 0.0000 | 0 | 0.0000 | 99786 |
| , | (ii) Individual-Holding Nom. Val. greater the | | 54 | 4317389 | 0 | 0 | 4317389 | 54.0221 | 4317389 | 0 | 4317389 | 54.0221 | 0 | 54.0221 | 0 | 0.0000 | 0 | 0.0000 | 3285789 |
| | Ankul Agarwal | AFUPA0513R | | 100000 | 0 | 0 | 100000 | 1.2513 | 100000 | 0 | 100000 | 1.2513 | 0 | 1.2513 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| | Apoorv Agarwal | ALXPA4366K | | 920000 | 0 | 0 | 920000 | 11.5117 | 920000 | 0 | 920000 | 11.5117 | 0 | 11.5117 | 0 | 0.0000 | 0 | 0.0000 | 920000 |
| | Arpit Agarwal | ALXPA4182D | | 311500 | 0 | 0 | 311500 | 3.8977 | 311500 | 0 | 311500 | 3.8977 | 0 | 3.8977 | 0 | 0.0000 | 0 | 0.0000 | 311500 |
| | Bajrang Lal Chauhan | ADIPC5549B | | 87200 | 0 | 0 | 87200 | 1.0911 | 87200 | 0 | 87200 | 1.0911 | 0 | 1.0911 | 0 | 0.0000 | 0 | 0.0000 | 17200 |
| | Ganesh Yadav | AAAPY1934D | | 102200 | 0 | 0 | 102200 | 1.2788 | 102200 | 0 | 102200 | 1.2788 | 0 | 1.2788 | 0 | 0.0000 | 0 | 0.0000 | 32200 |
| | Rajiv Ranjan Gupta | ADSPG7561R | | 100000 | 0 | 0 | 100000 | 1.2513 | 100000 | 0 | 100000 | 1.2513 | 0 | 1.2513 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| | Satish Agarwal | AFKPA9305B | | 871500 | 0 | 0 | 871500 | 10.9048 | 871500 | 0 | 871500 | 10.9048 | 0 | 10.9048 | 0 | 0.0000 | 0 | 0.0000 | 871500 |
| | Sushil Goel | AAEPG4352K | | 85400 | 0 | 0 | 85400 | 1.0686 | 85400 | 0 | 85400 | 1.0686 | 0 | 1.0686 | 0 | 0.0000 | 0 | 0.0000 | 84100 |
| (b) | Nbfc Registered With Rbi | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (c) | Employees Trust | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (d) | Overseas Depository Holding DRs | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 |
| (e) | Any Other | | | | | | | | | | | | | | | | | | |
| | Other - Body Corp | | 2 | 998500 | 0 | 0 | 998500 | 12.4939 | 998500 | 0 | 998500 | 12.4939 | 0 | 12.4939 | 0 | 0.0000 | 0 | 0.0000 | 998500 |
| | R L Agarwal And Sons Securities Private Lim | AAECR5759A | | 976500 | 0 | 0 | 976500 | 12.2186 | 976500 | 0 | 976500 | 12.2186 | 0 | 12.2186 | 0 | 0.0000 | 0 | 0.0000 | 976500 |
| | Other - Individual HUF | | 6 | 825625 | 0 | 0 | 825625 | 10.3308 | 825625 | 0 | 825625 | 10.3308 | 0 | 10.3308 | 0 | 0.0000 | 0 | 0.0000 | 825625 |
| | Satish Agarwal | AAAHS8787C | | 822500 | 0 | 0 | 822500 | 10.2917 | 822500 | 0 | 822500 | 10.2917 | 0 | 10.2917 | 0 | 0 | 0 | 0 | 822500 |
| | Sub-total (B)(3) | - | 169 | 6444900 | 0 | 0 | 6444900 | 80.6429 | 6444900 | 0 | 6444900 | 80.6429 | 0 | 80.6429 | 0 | 0 | 0 | 0 | 5209700 |
| | Total Public Shareholding | | 169 | 6444900 | 0 | 0 | 6444900 | 80.6429 | 6444900 | 0 | 6444900 | 80.6429 | 0 | 80.6429 | 0 | 0 | 0 | 0 | 5209700 |
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SRU STEELS LIMITED SHAREHOLDING PATTERN AS ON 31/03/2020

Table - IV Statement showing shareholding pattern of the Non Promter - Non Public shareholder

| S.No. | Category & Name of the Shareholder (I) | PAN (II) | No of Sharehold ers (III) | No. of fully paid Equity Share Held (IV) | No. Of Partly Paid Equity Shares Held (V) | No . Of shares underlying Depository Receipts (VI) | Total Nos. Shares Held (VII) = IV+V+VI | Sharehold ing % as of total no of Shares (VIII) as a % of (A+B+C2) | No of Voting Rights held in each class of securities (IX) | | | No of shares undelying outstanding convertible securities (including warrants) (X) | No. of Locked in Shares (XII) | | | | No of Equity Shares Held in Demateri alized form (XIV) | | |
|-------|--|----------|---------------------------------|--|--|--|--|---|--|---------|-------|--|----------------------------------|--|---------|--|--|--|--|
| | | | | | | | | | Class X | Class Y | Total | 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) | |
| (1) | Custodian/DR Holder | | | | | | | | | | | | | | | | | | |
| (a) | names | | | | | | | | | | | | | | | | | | |
| (2) | Employees Benefit Trust (under SEBI Based emplyees benefit) Regulation 2014 | | | | | | | | | | | | | | | | | | |
| (a) | names | | | | | | | | | | | | | | | | | | |
| | Toral Non-Promoter Non Public shareholding C = C1+C2 | | | | | | | | | | | | | | | | · | | |

Details of the SIO

Details of the FIO

Details of the rejected owner

Whether there are indirect.

Whether the FIO

Whether the F