## Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

1.	Name o	f Listed Entity: Surani Steel Tubes Limited
2.	Scrip Co	ode/Name of Scrip/Class of Security:
3.	Share H	olding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)
	a.	If under 31(1)(b) then indicate the report for Quarter ending
	b.	If under 31(1)(c) then indicate date of allotment/extinguishment
4	Declara	tion: The Listed entity is required to submit the following declaration to the extent of submission of information:-

y. E	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 or Warrants?		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	
5	Whether any shares held by promoters are pledge or otherwise encumbered?	Yes	

\* If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No of shares pledged or otherwise encumbered by promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.

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•							Sur	ani Stee	Tubes	Limited		•						4
		,				Table I -	Summary	Stateme	nt holding	of specif	ied securi	ties						
					100		Sharehold ing as a % of total	Number o		hts held in	each class	No. of Shares Underlyin	Sharehold ing , as a %	Number o	f Locked in	Number of pledged of encumber	rotherwise	
		Local Call		No. of Partly paid-up	No. of shares underlyin	l le	no. of shares (calculate	No of Vot	ng Rights			g Outstandi ng	conversio		As a % of		As a % of	Number of equity shares
Category	Category of shareholder	Nos. of sharehold ers	up equity shares held	equity shares held	B Depositor y Receipts	200100000000000000000000000000000000000	SCRR,	Class eg: )	Class eg: y	Total	Total as a % of (A+B+C)	convertible e securities	convertibl	No. (a)	total Shares held(b)	No. (a)	total Shares held(b)	held in demateria lised form
(1)	(11)	(111)	(IV)	(v)	(VI)	(VII) =	(VIII) As a			X)		(X)	(XI)=	(	XII)	0	(III)	(XIV)
	Promoter & Promoter Group		2814000	0	0	2814000	33.9691	2814000	0	2814000	33.9691	0	33.9691	1656800	58.8770	1157200	41.122900	
(B)	Public	371	5470000	0	0	5470000	66.0309	5470000	0	5470000	66.0309	0	66.0309	2708000	49.5063	NA	NA	5470000
(C)	Non Promoter - Non Public				0				0			0			0.0000	NA	NA	
(C1)	Shares Underlying DRs	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(C2)	Shares Held By Employee Trust	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
ole —	Total	384	8284000	0	0	8284000	100.0000	8284000	0	8284000	100.0000	0	100.0000	4364800	52.6895	1157200	13.969000	8284000

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		LI X						Sharehold	Number o	f Voting Rig es	hts held in	each class		Shareholding, as a % assuming full	Number o	f Locked In	Number o pledged o encumber	r otherwise	
	Category &		Nos. of	No. of fully paid up equity	Partly paid-up equity	No. of shares underlyin	Total nos.	calculated as per SCRR, 1957 As a	No of Voti	ng Rights		Total as a	Underlying Outstanding convertible securities	conversion of convertible securities ( as a percentage		As a % of total		As a % of total	Number of equity shares held in
	Name of the shareholders	PAN	sharehold ers	shares held	shares held	Depositor y Receipts	shares held	% of (A+B+C2)	Class eg:	Class eg: y	Total	% of (A+B+C)	(including Warrants)	of diluted share capital)	No. (a)	Shares held(b)	No. (a)	Shares held(b)	demateri lised form
1	(I)	(11)	(111)	(IV)	M	(VI)	(VII) = (IV)+(V)+ (VI)	(VIII) As a % of (A+B+C2)		(	IX)		(x)	(XI)= (VII)+(X) As a % of (A+B+C2)	c	XII)	p	KIII)	(XIV)
(a)	Individuals / Hindu Undivided Family		13	2814000	0	0	2814000	33.9691	2814000	0	2814000	33.9691	0	33.9691	1656800	58.8770	1157200	41.1230	2814000
	Dinesh K Patel	BHWPP3668P	1	407000	0	0	407000	4.9131	407000	0	407000	4.9131	0	4.9131	0	0.0000	407000	100.0000	407000
	Maniben Patel	AFBPP1440F	1	406000	0	0	406000	4.9010	406000	0	406000	4.9010	0	4.9010	406000	100.0000	0	0.0000	406000
	Karsanbhai Devjibhai Patel Huf .	AAJHK5562N	1	352000	0	o	352000	4.2492	352000	o	352000	4.2492	0	4.2492	0	0.0000	352000	100.0000	352000
	Prakash Karsanbhai Patel Huf	AAMHP3S38A	1	299000	0	0	299000	3.6094	299000	0	299000	3.6094	0	3.6094	0	0.0000	299000	100.0000	299000
	Vishram Shivgan Patel .	AFRPP0035N		269000		0	269000	3.2472	269000		269000	3.2472	0	3.2472	269000	100.0000	0	0.0000	269000
	Mukesh Patel	AEVPP6551L	1	215000	0	0	215000	2.5954	215000	0	215000	2.5954	0	2.5954	215000	100.0000	0	0.0000	215000
	Karsen Patel	AFGPP2648G	1	212000	0	0	212000	2.5592	212000	0	212000	2.5592	0	2.5592	112800	53.2075	99200	46.7925	212000
	Prakash Patel	AGPPP4448L	1	204000	0	0	204000	2.4626	204000	0	204000	2.4626	0	2.4626	204000	100.0000	0	0.0000	204000
10	Laxmiben Vishrambhai Patel	AEVPP6567Q	1	120000	0	0	120000	1.4486	120000	0	120000	1.4486	0	1.4486	120000	100.0000	0	0.0000	120000
	Mukeshbhai Patel Huf .	AAMHM7202A	1	106000	0	0	106000	1.2796	106000	0	106000	1.2796	0	1.2796	106000	100.0000	0	0.0000	106000
	Vishrambhai											-							
	Patel Huf .	AAIHV0129H	1	100000	0	0	100000	1.2071	100000	0	100000	1.2071	0	1.2071	100000	100.0000	0	0.0000	100000
	Hetal D Patel	BWJPP6566J	1	64000	0	0	64000	0.7726	64000	0	64000	0.7726	0	0.7726	64000	100.0000	0	0.0000	64000
	Dimple M Patel .  Central Government /	ANXPP7051Q	1	60000	0	0	60000	0.7243	60000	0	60000	0.7243	0	0.7243	60000	100.0000	0	0.0000	60000
(b)	State Government(s)	100		0		0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Financial Institutions / Banks					0	0	0.0000				0.0000		0.0000		0.0000		0.0000	
1-1	Any Other				-	-	1	0.0000	-	ľ	1	0.0000	-	0.5000	-	0.0000	-	0.0000	1
(d)	(Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
2	Sub Total (A)(1) Foreign		13	2814000	0	0	2814000	33.9691	2814000	0	2814000	33.9691	0	33.9691	1656800	58.8770	1157200	41.1230	2814000

				100		214			Number o		hts held in	each class		as a 70	Number o	f Locked in	Number of pledged of encumber	r otherwise	
	100			No. of fully paid	Partly paid-up	No. of shares underlyin		calculated as per SCRR,	No of Vot	ing Rights			Underlying Outstanding convertible	conversion of convertible securities ( as		As a % of		As a % of	Number of equity shares
	Category & Name of the shareholders	PAN	Nos. of sharehold ers	up equity shares held	equity shares held	B Depositor y Receipts	Total nos. shares held	1957 As a % of (A+B+C2)	Class eg:	Class eg:	Total	Total as a % of (A+8+C)	securities (including Warrants)	a percentage of diluted share capital)	No. (a)	total Shares . held(b)	No. (a)	total Shares held(b)	held in demateria lised form
(a)	Individuals (Non- Resident Individuals / Foreign Individuals)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	
(b)	Government		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Institutions		0	0	0	0	0	0.0000	0	0	0	0.0000	0	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	0.0000	0	0.0000	0	0.0000	0
(e)	Any Other (Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Sub Total (A)(2)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Total Shareholding Of Promoter And Promoter Group (A)= (A)(1)+(A)(2)		13	2814000	0	0	2814000	33.9691	2814000	0	2814000	33.9691	0	33.9691	1656800		1157200	41.1230	2814000

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	e III - Statement showing shareho	and pattern o	THE PUBLIS	- annu Cito	-	-	_		_		_	-	_		-			-	
_			1			_					_	11.07	_						_
									Number o	f Voting Rigi	hts held in	each class	,		Number of shares	f Locked In	Number of pledged of encumber	or otherwise	
								Sharehold	No of Voti	ne Riehts			No. of Shares	Shareholding , as a % assuming full					
	Category & Name of the shareholders	PAN	Nos. of sharehold	up equity	Partly paid-up equity shares held	No. of shares underlyin & Depositor y Receipts	Total nos. shares held	calculated as per SCRR, 1957 As a % of	Class eg:			Total as a	Underlying Outstanding convertible securities (including	conversion of convertible securities ( as a percentage of diluted		As a % of total Shares		As a % of total Shares held(b)	Number of equity shares held in demateri
_	shareholders (f)	(II)	ers (III)	(IV)	(V)	(VI)	(VII)=	(VIII) As a	X	Class eg: y	X)	(A+B+C)	Warrants)	share capital) (XI)= (VII)+(X)		held(b)	No. (a)	XIII)	lised form
1	Institutions	(11)	(111)	(14)	(4)	(vg	(vii)=	(VIII) AS a		- "	N .	_	(X)	(XI)= (VII)+(X)	-	T T	-	XIII)	(XIV)
(a)	Mutual Fund		0	0	0	0	0	0.0000	0	0	0	0.0000		0.0000	0	0.0000	NA	NA	0
(b)	Venture Capital Funds		0	0	0	0	0	0.0000	0		0	0.0000	0	0.0000	0	0.0000	NA NA	NA NA	0
(c)	Alternate investment Funds		0	0	0	0	0	0.0000	0		0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(d)	Foreign Venture Capital Investors		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	
(e)	Foreign Portfolio Investor		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(f)	Financial Institutions / Banks		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(g)	Insurance Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(h)	Provident Funds/ Pension Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(1)	Any Other (Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
	Sub Total (B)(1)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
2	Central Government/ State Government(s)/ President of India						•												
	Sub Total (8)(2)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
3	Non-Institutions						100								10 May 12		130		
(a)	Individuals			0	0								100		0		NA	NA	
	<ol> <li>Individual shareholders holding nominal share capital up to Rs. 2 lakhs.</li> </ol>		297	1180225	0	0	1180225	14.2470	1180225	0	1180225	14.2470	0	14.2470	20000	1.6946	NA	NA.	1180225
	II. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.	7.1314	33	3511321	0	0	3511321	42.3868	3511321	0	3511321	42.3868	0	42.3868	2423000	69.0054	NA	NA	3511321
	Chilkesh Ambalal Patel	AKSPP4443N		294000	0	0	294000	3.5490	294000	0	294000	3.5490	0	3.5490	290000	98.6395	NA	NA.	294000
2	Chintan Mukeshbhai Patel	CPXPP9563F		140000	0	0	140000	1.6900	140000	0	140000	1.6900	0	1.6900	0	0.0000	NA	NA	140000
	Dhrumil Rakeshbhai Amin .	BCCPA9907M		145000	0	0	145000	1.7504	145000	0	145000	1.7504	0	1.7504	145000	100.0000	NA	NA:	145000
	Dhruvkumar Amin .	BAMPA3899J		145000	0	0	145000	1.7504	145000	0	145000	1.7504	0	1.7504	145000	100.0000	NA	NA	145000
	Dipak Hiralal Shah	BAMPS8851A		94000	0	0	94000	1.1347	94000	0	94000	1.1347	0	1.1347	0	0.0000	NA	NA	94000
	Gangarambhal Dahyabhal Patel .	ABCPP2254N		122500	0	0	122500	1.4788	122500	0	122500	1.4788	0	1.4788	122500	100.0000	NA	NA.	122500
	Hasmukhbhai Shivdasbhai Patel	AFTPP0713P		261000	0	0	261000	3.1507	261000	0	261000	3.1507	0	3.1507	255000	97.7011	NA	NA	261000
			1	142000			142000	1.7141	142000		142000	1.7141		1.7141		0.0000	NA -	NA	142000

		Aezed Z			M				Number o	f Voting Rig	hts held in	each class			Number of	of Locked in	Number of pledged of encumber	or otherwise	
					4			Sharehold	No of Voti	ng Rights			No. of Shares	Shareholding , as a % assuming full		Para la			
	Category & Name of the shareholders	PAN		No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlyin & Depositor y Receipts	Total nos. shares held	calculated as per SCRR, 1957 As a % of (A+B+CZ)	Class eg:	Class eg: y	Total	Total as a % of (A+B+C)	Underlying Outstanding convertible securities (including Warrants)	conversion of convertible securities ( as a percentage of diluted share capital)	No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)	Number of equity shares held in demateria lised form
	Patel Nandial R.	ADNPPS075G		147000	0	0	147000	1.7745	147000	0	147000	1.7745	0	1.7745	145000	98.6395	NA	NA	147000
	Purushottom Karshanbhai Patel .	ACIPP3116E	-	116000	0	0	116000	1.4003	116000	0	116000	1.4003	0	1.4003	116000	100.0000	NA	NA	116000
	Rajesh Dhansukhbhai Patel .	AGPPP3428C		155000	0	0	155000	1.8711	155000	0	155000	1.8711	0	1.8711	145000	93.5484	NA	NA	155000
	Shital Patel.	AKAPP6903B		566000	0	0	566000	6.8324	566000	0	566000	6.8324	0	6.8324	272000	48.0565	NA	NA	566000
	Soni Dishank Kanaiyalal .	DTQPS9965C		145000	0	0	145000	1.7504	145000	0	145000	1.7504	0	1.7504	145000	100.0000	NA	NA.	145000
	Suresh Gangaram Patel .	AFLPP1086R		191000	0	0	191000	2.3056	191000	0	191000	2.3056	0	2.3056	191000	100,0000	NA	NA	191000
(b)	NBFCs registered with RBI		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
	Trust Employee		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(d)	Overseas Depositories(holding DRs) (balancing figure)		0	0	0	0		0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
(e)	Any Other (Specify)		41	778454	0	0	778454	9.3971	778454	0	778454	9.3971	0	9.3971	265000	34.0418	NA	NA	778454
	Hindu Undivided Family		34	632704	0	0	632704	7.6377	632704	0	632704	7.6377	0	7.6377	265000	41.8837	NA	NA	632704
	Hasmukhbhai Sivdasbhai Patel Huf	AADHH3155A	1	267000	0	0	267000	3.2231	267000	0	267000	3.2231	0	3.2231	265000	99.2509	NA	NA	267000
	Pritesh Y Shah (Huf)	AAIHP7933H	1	218000	0	0	218000	2.6316	218000	0	218000	2.6316	0	2.6316	0	0.0000	NA	NA	218000
	Non Resident Indians (Repat)		1	2000	0	0	2000	0.0241	2000	0	2000	0.0241	0	0.0241	0	0.0000	NA	NA	2000
	Clearing Member		3	5750	0	0	5750	0.0694	5750	0	5750	0.0694	0	0.0694	0	0.0000	NA	NA	5750
	Bodies Corporate		3	138000	0	0	138000	1.6659	138000	0	138000	1.6659	0	1.6659	0	0.0000	NA	NA	138000
	Pantomath Stock Brokers Private Umited	AAHCP6713F	1	132000	0	0	132000	1.5934	132000	0	132000	1.5934	0	1.5934	0	0.0000	NA	NA	132000
	Sub Total (8)(3)		371	5470000	0	0	5470000	66.0309	5470000	0	5470000	66.0309	0	66.0309	2708000	49.5064	NA	NA	5470000
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)	PULL	371	5470000	0	0	5470000	66.0309	5470000	0	5470000	66,0309	0	66.0309	2708000	49,5064	NA	NA	5470000

Note:

(3) PAN would not be displayed on website of Stock Exchange(s).

(2) The above format needs to disclose name of all holders holding more than 154 of total n

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in

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rrani Steel Tubes Limited ble IV - Statement showing sharehol	ding	attern of	the Non i	romoter	- Non Publ	ic shareh	older											
				- N-	No. of		calculated	Number		ghts h	eld in each	No. of Shares Underlying	conversion of	Numbe Locked	r of in shares	pledged	lse	Number
		Nos. of	No. of fully paid up equity	The state of the s	shares underlyin	Total nos.	as per SCRR, 1957 As a	No of Vot	ing Rights		Total as a	Outstanding convertible securities	convertible securities ( as a percentage		As a % of total		As a % of	of equity shares held in
Category & Name of the shareholders	PAN	sharehold		shares held	Depositor y Receipts	shares		Class eg:	Class eg:	Total	% of (A+B+C)	(including	of diluted share capital)	No. (a)	Shares held(b)	No. (a)	Shares held(b)	demateri
(1)	(11)	(III)	(IV) ·	(V)	(VI)	(VII) =	(VIII) As a		(IX	)		(X)	(XI)= (VII)+(X)	0	XII)	(	XIII)	(XIV)
Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0
Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)		0	o	0	0	0	0.0000	0	o	0	0.0000	o	0.0000	0	0.0000	NA	NA	0
Total Non-Promoter- Non Public Shareholding (C)= (C)(1)+(C)(2)	Т	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0

Note:
(1) PAN would not be displayed on website of Stock Exchange(s).
(2) The above format needs to disclose name of all holders holding.

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Regul	ation 31 - Annexur	e of PAN clubbed cases			•
Sr.No.	Folio/Dpid-Clid	Name	PAN	Shares	Category
1	1201090010133500	HASMUKHBHAI SHIVDASBHAI PATEL HUF.	AADHH3155A	265000	Hindu Undivided Family
2	IN30154951946464	HASMUKHBHAI SIVDASBHAI PATEL HUF	AADHH3155A	2000	Hindu Undivided Family
	Total			267000	
1	1208380000000413	PANTOMATH STOCK BROKERS PRIVATE LIMITED	AAHCP6713F	130000	Other Bodies Corporate
2	1208380000007670	PANTOMATH STOCK BROKERS PRIVATE LIMITED	AAHCP6713F	2000	Other Bodies Corporate
	Total			132000	
1	1208130000012481	DIPAK H SHAH (HUF)	AAIHD4435J	44000	Hindu Undivided Family
2	IN30246110530802	DIPAK H SHAH	AAIHD4435J	18000	Hindu Undivided Family
	Total			62000	
1	1202890001094817	PRITESH Y SHAH (HUF)	AAIHP7933H	140000	Hindu Undivided Family
2	1206490000011173	PRITESH Y SHAH (HUF)	AAIHP7933H	78000	Hindu Undivided Family
	Total			218000	
1	1201090009456918	PATEL NANDLAL RAMBHAI .	ADNPP5075G	145000	Public
2	IN30164510285397	PATEL NANDLAL R.	ADNPP5075G	2000	Public
	Total			147000	
1	1201090009456519	HASMUKHBHAI SHIVDASBHAI PATEL.	AFTPP0713P	255000	Public
2	IN30154951947432	HASMUKHBHAI SHIVDASBHAI PATEL	AFTPP0713P	6000	Public
	Total			261000	
1	1203000001146492	DINESHBHAI BABABHAI PATEL	AGHPP9341A	6000	Public
2	1203230001201990	DINESHBHAI BABABHAI PATEL	AGHPP9341A	2000	Public
	Total			8000	
1	1206490000011188	PRITESH YASHWANTLAL SHAH	AKXPS2587H	16000	Public
2	IN30148510177636	PRITESH YASHWANTBHAI SHAH	AKXPS2587H	14000	Public
	Total			30000	
1	1301670000287391	SHAH SWATI SHAILESH	BBTPS3282B	20000	Public
2	IN30045014479573	SHAH SWATI	BBTPS3282B	18000	Public
3	IN30051311866665	SWATI S SHAH	BBTPS3282B	10000	Public
	Total			48000	

GENERATED ON:03/10/2019

NSDL: 30/09/2019

CDSL:30/09/2019

