



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

**As on the financial year ended on March 31, 2020**

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

**I. REGISTRATION & OTHER DETAILS:**

1	CIN	L27201DL1974PLC007114
2	Registration Date	26.02.1974
3	Name of the Company	Rama Steel Tubes Limited
4	Category/ Sub-Category of the Company	Public Company
5	Address of the Registered office and contact details	B-5, 3 <sup>rd</sup> Floor, Main Road, Ghazipur, New Delhi – 110096 Contact No. 011-43446600 Email:investors@ramasteel.com Website-www.ramasteel.com
6	Whether listed company	Yes
7	Name, Address and Contact details of Registrar and Transfer Agent, if any	Bigshare Services Private Limited 302, Kushal Bazar, 32-33, Nehru Place, New Delhi-110019 Email-bssdelhi@bigshareonline.com Phone No.-011-42425004

**II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Manufacturing and Trading of Steel Pipes	24311	98.41%

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES**

**(A) DIRECT SUBSIDIARIES OF RAMA STEEL TUBES LIMITED**

S. No	Name & Address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of Shares held	Applicable Section
1	LEPAKSHI TUBES PRIVATE LIMITED B-5, 3 <sup>rd</sup> Floor, Main Road, Ghazipur, New Delhi -110096	U28990DL2016PTC302210	Subsidiary Company	100	2(87)
2	RST INTERNATIONAL TRADING, FZE P.O. Box 18684 Jebel Ali Free Zone Dubai, UAE	--	Subsidiary Company	100	2(87)

**(B) DIRECT SUBSIDIARIES OF RST INTERNATIONAL TRADING, FZE**

S. No	Name & Address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of Shares held	Applicable Section
1	RST Industries Limited 2, Accosiation Avenue, Off Coker Road (ILUPEJU, LAGOS)	--	Subsidiary Company	90	2(87)

**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)**
**A) Category-wise Share Holding**

Category of Shareholders	No. of Shares held on 31-March-2019				No. of Shares held on 31-March-2020				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoter s</b>									
<b>(1) Indian</b>									
a) Individual/ HUF	10143000	0	10143000	60.40	10290863	0	10290863	61.28	0.88
b) Central/state Govt	0	0	0	0.00	0	0	0	0.00	0.00
c) Bodies Corp.	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 (Specify)	0	0	0	0.00	0	0	0	0.00	0.00
1 Group Companies	0	0	0	0.00	0	0	0	0.00	0.00
2 Director Relatives	0	0	0	0.00	0	0	0	0.00	0.00
Sub-total (A) (1):-	10143000	0	10143000	60.40	10290863	0	10290863	61.28	0.88
<b>(2) Foreign</b>									0.00
a) NRIs - Individuals	0	0	0	0.00	0	0	0	0.00	0.00
b) Other – Individuals	0	0	0	0.00	0	0	0	0.00	0.00
c) Bodies Corp.	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
<b>Total shareholding of Promoter (A) = (A)(1)+(A)( 2)</b>	10143000	0	10143000	60.40	10290863	0	10290863	61.28	0.88
<b>B. Public Shareholding</b>									
<b>1. Institutions</b>									
a) Mutual Funds	0	0	0	0.00	0	0	0	0.00	0.00
b) Banks / FI	65	0	65	0.00	0	0	0	0.00	-0.00
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 Funds	0	0	0	0.00	0	0	0	0.00	0.00
f) Insurance Companies	0	0	0	0.00	0	0	0	0.00	0.00
g) FIs	0	0	0	0.00	0	0	0	0.00	0.00
h) Foreign Venture Capital Funds	0	0	0	0.00	0	0	0	0.00	0.00
i) Others (specify) Foreign Portfolio Investor	0	0	0	0.00	0	0	0	0.00	0
Sub-total (B)(1):-	65	0	65	0.00	0	0	0	0.00	-0.00
<b>2. Non-Institutions</b>									
a) Bodies Corp.	735993	0	735993	4.38	409021	0	409021	2.44	-1.95
b) Individuals									
i) Individual shareholders holding nominal share capital upto ₹ 1 lakh	1655313	45001	1700314	10.12	1658236	39001	1697237	10.11	-0.02



Category of Shareholders	No. of Shares held on 31-March-2019				No. of Shares held on 31-March-2020				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	3199047	0	3199047	19.05	3667229	0	3667229	21.28	2.79
c) Others (specify)									
Hindu Undivided Family	547801	0	547801	3.26	528985	0	528985	3.15	-0.11
Trust	0	0	0	0.00	0	0	0	0.00	0.00
Clearing Member	382918	0	382918	2.28	95524	0	95524	0.57	-1.71
Non Resident Indians	4501	0	4501	0.03	0	0	0	0.00	-0.03
Non Resident Indians (Repat)	58186	0	58186	0.35	71455	0	71455	0.43	0.08
Non Resident Indians (Non Repat)	22175	0	22175	0.13	33686	0	33686	0.20	0.07
<b>Sub-total (B)(2):-</b>	6605934	45001	6650935	37.60	6464136	39001	6503137	38.72	-0.88
<b>Total Public Shareholding (B)=(B)(1)+ (B)(2)</b>	6605999	45001	6651000	39.60	6464136	39001	6503137	38.72	-0.88
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>									
<b>Promoter and promoter group</b>	0	0	0	0.00	0	0	0	0.00	0.00
<b>Public</b>	0	0	0	0.00	0	0	0	0.00	0.00
<b>Sub-total (C)</b>	0	0	0	0.00	0	0	0	0.00	0.00
<b>Grand Total (A+B+C)</b>	16748999	45001	16794000	100.00	16754999	39001	16794000	100.00	0.00

#### B) Shareholding of Promoter-

S.No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		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	
1	Naresh Kumar Bansal	6108000	36.37	0.00	6212578	36.99	0.00	0.62
2	Kumud Bansal	690000	4.11	0.00	692000	4.12	0.00	0.01
3	Richi Bansal	1443000	8.59	0.00	1469287	8.75	0.00	0.16
4	Krati Bansal	450000	2.68	0.00	450000	2.68	0.00	0.00
5	Nikhil Naresh Bansal	1341000	7.99	0.00	1355998	8.07	0.00	0.08
6	Kanika Bansal	111000	0.66	0.00	111000	0.66	0.00	0.00

**C) Change in Promoters' Shareholding**

S. No.	Name of Shareholder	Shareholding of the promoters		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	<b>Naresh Kumar Bansal</b>				
	<b>At the beginning of the year</b>	6108000	36.37		
	Change during the Year	104578	0.62		
	<b>At the end of the year</b>			6212578	36.99
2	<b>Kumud Bansal</b>				
	<b>At the beginning of the year</b>	690000	4.11		
	Change during the Year	2000	0.01		
	<b>At the end of the year</b>			692000	4.12
3	<b>Richi Bansal</b>				
	<b>At the beginning of the year</b>	1443000	8.59		
	Change during the Year	26287	0.16		
	<b>At the end of the year</b>			1469287	8.75
4	<b>Krati Bansal</b>				
	<b>At the beginning of the year</b>	450000	2.68		
	Change during the Year	0			
	<b>At the end of the year</b>			450000	2.68
5	<b>Nikhil Naresh Bansal</b>				
	<b>At the beginning of the year</b>	1341000	7.99		
	Change during the Year	14998	0.08		
	<b>At the end of the year</b>			1355998	8.07
6	<b>Kanika Bansal</b>				
	<b>At the beginning of the year</b>	111000	0.66		
	Change during the Year	0			
	<b>At the end of the year</b>			111000	0.66

**D) Shareholding Pattern of top ten Shareholders (Other than Directors and Promoters):**

S. No.	Name of Shareholders (Top 10 Shareholders)	Shareholding at the beginning of the year		Shareholding at the end of the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	TARUN DHIR	954821	5.69	1209821	7.20
2	MADHUKAR SHETH	753670	4.49	775995	4.62
3	PUNE E STOCK BROKING PVT LTD - COLLATERAL ACCOUNT	399239	2.38	0	0.00
4	RITA DHAWAN	297602	1.77	297602	1.77
5	VIPUL BANSAL	0	0.00	211415	1.26
6	PRAFULCHANDRA ANANTRAI DESAI	192980	1.15	142980	0.85
7	SUMIT P DESAI (HUF)	100000	0.60	170000	1.01
8	DESAI NIRAL NEERAV	141572	0.84	141572	0.84
9	PRAMOD KUMAR RAJPUT	0	0.00	106000	0.63
10	KAMAL VISARIA	100000	0.60	100000	0.60
11	JYOTIVARDHAN JAIPURIA	90623	0.54	90622	0.54
12	INKAM FINVEST PVT LTD	85300	0.51	87915	0.52



S. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
<b>1</b>	<b>TARUN DHIR</b>				
	<b>At the beginning of the year</b>	<b>954821</b>	<b>5.69</b>		
	Change during the Year				
	26-Jul-2019	116500		1071321	6.38
	02-Aug-2019	138500		1209821	7.20
	<b>At the end of the year</b>			<b>1209821</b>	<b>7.20</b>
<b>2</b>	<b>MADHUKAR SHETH</b>				
	<b>At the beginning of the year</b>	<b>753670</b>	<b>4.49</b>		
	Change during the Year				
	24-May-2019	2423		756093	4.50
	14-Jun-2019	10522		766615	4.56
	21-Jun-2019	-522		766093	4.56
	19-Jul-2019	3000		769093	4.58
	30-Sep-2019	6902		775995	4.62
	<b>At the end of the year</b>			<b>775995</b>	<b>4.62</b>
<b>3</b>	<b>PUNE E STOCK BROKING PVT LTD - COLLATERAL ACCOUNT</b>				
	<b>At the beginning of the year</b>	<b>399239</b>	<b>2.38</b>		
	Change during the Year				
	05-Apr-2019	-215594		183645	1.09
	12-Apr-2019	-6661		176984	1.05
	19-Apr-2019	92140		269124	1.60
	26-Apr-2019	-17865		251259	1.50
	03-May-2019	-218786		32473	0.19
	10-May-2019	83086		115559	0.69
	17-May-2019	-610		114949	0.68
	24-May-2019	46765		161714	0.96
	31-May-2019	-45370		116344	0.69
	07-Jun-2019	-62801		53543	0.32
	14-Jun-2019	-7524		46019	0.27
	21-Jun-2019	29250		75269	0.45
	28-Jun-2019	71177		146446	0.87
	05-Jul-2019	-5523		140923	0.84
	12-Jul-2019	-6138		134785	0.80
	19-Jul-2019	-24139		110646	0.66
	26-Jul-2019	-78371		32275	0.19
	02-Aug-2019	-31775		500	0.00
	09-Aug-2019	-500		0	0.00
	13-Sep-2019	2121		2121	0.01
	20-Sep-2019	-2121		0	0.00
	18-Oct-2019	1197		1197	0.01
	25-Oct-2019	-1197		0	0.00
	08-Nov-2019	500		500	0.00
	15-Nov-2019	-500		0	0.00
	27-Dec-2019	600		600	0.00
	31-Dec-2019	-600		0	0.00
	06-Mar-2020	5000		5000	0.03
	13-Mar-2020	-5000		0	0.00

S. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	20-Mar-2020	619		619	0.00
	27-Mar-2020	-619		0	0.00
	<b>At the end of the year</b>			<b>0</b>	<b>0.00</b>
<b>4</b>	<b>RITA DHAWAN</b>				
	<b>At the beginning of the year</b>	<b>297602</b>	<b>1.77</b>		
	Change during the Year	0	0.00		
	<b>At the end of the year</b>			<b>297602</b>	<b>1.77</b>
<b>5</b>	<b>VIPUL BANSAL</b>				
	<b>At the beginning of the year</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0.00</b>
	Change during the Year				
	31-May-2019	200000		200000	1.19
	20-Sep-2019	11415		211415	1.26
	<b>At the end of the year</b>			<b>211415</b>	<b>1.26</b>
<b>6</b>	<b>PRAFULCHANDRA ANANTRAI DESAI</b>				
	<b>At the beginning of the year</b>	<b>192980</b>	<b>1.15</b>		
	Change during the Year				
	2-Aug-2019	-50000		142980	0.85
	<b>At the end of the year</b>			<b>192980</b>	<b>0.85</b>
<b>7</b>	<b>SUMIT P DESAI (HUF)</b>				
	<b>At the beginning of the year</b>	<b>100000</b>	<b>0.60</b>		
	Change during the Year				
	17-May-2019	69501		169501	1.01
	31-May-2019	499		170000	1.01
	<b>At the end of the year</b>			<b>170000</b>	<b>1.01</b>
<b>8</b>	<b>DESAI NIRAL NEERAV</b>				
	<b>At the beginning of the year</b>	<b>141572</b>	<b>0.84</b>		
	Change during the Year	0	0.00		
	<b>At the end of the year</b>			<b>141572</b>	<b>0.84</b>
<b>9</b>	<b>PRAMOD KUMAR RAJPUT</b>				
	<b>At the beginning of the year</b>	<b>0</b>	<b>0.00</b>		
	Change during the Year				
	30-Sep-2019	100000		100000	0.60
	06-Dec-2019	5000		105000	0.63
	27-Dec-2019	-1500		103500	0.62
	03-Jan-2020	-1050		102450	0.61
	10-Jan-2020	-2450		100000	0.60
	17-Jan-2020	2000		102000	0.61
	24-Jan-2020	-2000		100000	0.60
	07-Feb-2020	1000		101000	0.60
	14-Feb-2020	276		101276	0.60
	21-Feb-2020	1224		102500	0.61
	28-Feb-2020	679		103179	0.61
	06-Mar-2020	-179		103000	0.61
	13-Mar-2020	2000		105000	0.63



S. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	20-Mar-2020	1000		106000	0.63
	<b>At the end of the year</b>			<b>106000</b>	<b>0.63</b>
<b>10</b>	<b>KAMAL VISARIA</b>				
	<b>At the beginning of the year</b>	<b>100000</b>	<b>0.60</b>		
	Change during the Year	0	0.00		
	<b>At the end of the year</b>			<b>100000</b>	<b>0.60</b>
<b>11</b>	<b>JYOTIVARDHAN JAIPURIA</b>				
	<b>At the beginning of the year</b>	<b>90623</b>	<b>0.54</b>		
	Change during the Year				
	22-Nov-2019	-1		90622	0.54
	<b>At the end of the year</b>			<b>90622</b>	<b>0.54</b>
<b>12</b>	<b>INKAM FINVEST PVT LTD</b>				
	<b>At the beginning of the year</b>	<b>85300</b>	<b>0.51</b>		
	Change during the Year				
	10-May-2019	-1000		84300	0.50
	26-Jul-2019	1000		85300	0.51
	07-Feb-2020	2615		87915	0.52
	<b>At the end of the year</b>			<b>85300</b>	<b>0.52</b>

## E) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
<b>1</b>	<b>Naresh Kumar Bansal</b>				
	<b>At the beginning of the year</b>	6108000	36.37		
	Change during the Year	104578	0.62		
	<b>At the end of the year</b>			6212578	36.99
<b>2</b>	<b>Richi Bansal</b>				
	<b>At the beginning of the year</b>	1443000	8.59		
	Change during the Year	26287	0.16		
	<b>At the end of the year</b>			1469287	8.75

## V) INDEBTEDNESS -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(₹ in Lakhs)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	6895.43	121.18	NIL	7016.61
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
<b>Total (i+ii+iii)</b>	<b>6895.43</b>	<b>121.18</b>	<b>NIL</b>	<b>7016.61</b>

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Change in Indebtedness during the financial year</b>				
* Addition	57220.35	2.60	NIL	57222.95
* Reduction	57254.66	63.84	NIL	57318.50
Net Change	34.31	61.24	NIL	95.55
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	6861.12	59.94	NIL	6921.06
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
<b>Total (i+ii+iii)</b>	<b>6861.12</b>	<b>59.94</b>	<b>NIL</b>	<b>6921.06</b>

**VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL-**
**A. Remuneration to Managing Director, Whole-time Directors and/or Manager:**

(₹ in Lakhs)

S.No.	Particulars of Remuneration	Name of MD/ WTD/ Manager	Name of Other Executive Director		Total Amount
		Mr. Naresh Kumar Bansal, MD	Mr. Richi Bansal, Director	Mr. Surender Kumar Sharma, Director	
1	Gross salary				
	(a) Salary as per provisions contained in Section 17(1) of the Income-tax Act, 1961	47.60	41.60	3.03	92.23
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	0.40	0.40	0.17	0.97
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission - as % of profit - others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-
	<b>Total (A)</b>	<b>48.00</b>	<b>42.00</b>	<b>3.20</b>	<b>93.20</b>
	Ceiling as per the Act	Due to the Inadequate profit, in terms of section 198 of the Companies Act, 2013 ("the Act"), the Remuneration to Managing Director & Director exceeds the prescribed ceiling as provided in section 197 of the Act read together with Schedule V of the Companies Act, 2013. Accordingly, Approval of Members of the Company by Special Resolution in Extra-Ordinary Meeting held on 3 <sup>rd</sup> March, 2017, under Section 196, 197, 203 and other applicable provisions, if any, of the Companies Act, 2013.			



**B. Remuneration to Other Directors**

(₹ in Lakhs)

S.N.	Particulars of Remuneration	Name of Directors				Total Amount
		Mr. Bharat Bhushan Sahny	Mr. Charat Sharma	Mr. Rajendra Prasad Khanna	Mrs. Anju Gupta	
1	<b>Independent Directors</b>					
	Fee for attending board committee meetings	0.30	0.10	0.00	0.35	0.75
	Remuneration by way of Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	<b>Total (1)</b>	<b>0.30</b>	<b>0.10</b>	<b>0.00</b>	<b>0.35</b>	<b>0.75</b>
2	<b>Other Non-Executive Directors</b>					
	Fee for attending board committee meetings	-	-	-	-	-
	Commission	-	-	-	-	-
	Others, please specify	-	-	-	-	-
	<b>Total (2)</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
	<b>Total (B)=(1+2)</b>					<b>0.75</b>
	<b>Total Managerial Remuneration Total=(A+B)</b>					<b>93.95</b>

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

SN	Particulars of Remuneration	Key Managerial Personnel		
		Company Secretary	Chief Financial Officer	Total
1	Gross salary			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	5.16	19.00	24.16
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	-	-	-
2	Stock Option	-	-	-
3	Sweat Equity	-	-	-
4	Commission	-	-	-
	- as % of profit			
	- others, specify...			
5	Others, please specify	-	-	-
	<b>Total</b>	<b>5.16</b>	<b>19.00</b>	<b>24.16</b>

**VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:**

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