

Form No. MGT-9
EXTRACT OF ANNUAL RETURN

As on the financial year ended on March 31, 2021

[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 rd Floor, Main Road, Ghazipur, New Delhi - 110096 Contact No. +91-11-43446600 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	99.05%

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 rd Floor, Main Road, Ghazipur, New Delhi -110096	U28990DL2016PTC 302210	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	99	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-2020				No. of Shares held on 31-March-2021				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	10290863	0	10290863	61.28	10468133	0	10468133	62.33	1.06
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):-	10290863	0	10290863	61.28	10468133	0	10468133	62.33	1.06
(2) Foreign									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
Total shareholding of Promoter (A) = (A)(1)+(A)(2)	10290863	0	10290863	61.28	10468133	0	10468133	62.33	1.06
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	0	0	0	0.00	0	0	0	0.00	0.00
b) Banks / FI	0	0	0	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) FIIs	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	0.00
Sub-total (B)(1):-	0	0	0	0.00	0	0	0	0.00	0.00
2. Non-Institutions									
a) Bodies Corp.	409021	0	409021	2.44	508125	0	508125	3.03	0.59
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	1658236	39001	1697237	10.11	1382889	39001	1421890	8.47	-1.64
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	3667229	0	3667229	21.28	3812509	0	3812509	22.70	0.87
c) Others (specify)									
Hindu Undivided Family	528985	0	528985	3.15	458312	0	458312	2.73	-0.42
Trust	0	0	0	0.00	0	0	0	0.00	0.00
Clearing Member	95524	0	95524	0.57	69920	0	69920	0.42	-0.15
Non Resident Indians	0	0	0	0.00	279	0	279	0.00	0.00
Non Resident Indians (Repat)	71455	0	71455	0.43	38122	0	38122	0.23	-0.20
Non Resident Indians (Non Repat)	33686	0	33686	0.20	16710	0	16710	0.10	-0.10
Sub-total (B)(2):-	6464136	39001	6503137	38.72	6286866	39001	6325867	37.67	-1.06
Total Public Shareholding (B)=(B)(1)+ (B)(2)	6464136	39001	6503137	38.72	6286866	39001	6325867	37.67	-1.06
C. Shares held by Custodian for GDRs & ADRs									
Promoter and promoter group	0	0	0	0.00	0	0	0	0.00	0.00
Public	0	0	0	0.00	0	0	0	0.00	0.00
Sub-total (C)	0	0	0	0.00	0	0	0	0.00	0.00
Grand Total (A+B+C)	16754999	39001	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	6212578	36.99	0.00	6389848	38.05	0.00	1.06
2	Kumud Bansal	692000	4.12	0.00	692000	4.12	0.00	0.00
3	Richi Bansal	1469287	8.75	0.00	1469287	8.75	0.00	0.00
4	Krati Bansal	450000	2.68	0.00	450000	2.68	0.00	0.00
5	Nikhil Naresh Bansal	1355998	8.07	0.00	1355998	8.07	0.00	0.00
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	Naresh Kumar Bansal				
	At the beginning of the year	6212578	36.99		
	Change during the Year	177270	1.06		
	At the end of the year			6389848	38.05
2	Kumud Bansal				
	At the beginning of the year	692000	4.12		
	Change during the Year	0	0.00		
	At the end of the year			692000	4.12
3	Richi Bansal				
	At the beginning of the year	1469287	8.75		
	Change during the Year	0	0.00		
	At the end of the year			1469287	8.75
4	Krati Bansal				
	At the beginning of the year	450000	2.68		
	Change during the Year	0	0.00		
	At the end of the year			450000	2.68
5	Nikhil Naresh Bansal				
	At the beginning of the year	1355998	8.07		
	Change during the Year	0	0.00		
	At the end of the year			1355998	8.07
6	Kanika Bansal				
	At the beginning of the year	111000	0.66		
	Change during the Year	0	0.00		
	At the end of the year			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	1209821	7.20	1209821	7.20
2	MADHUKAR SHETH	775995	4.62	775995	4.66
3	RITA DHAWAN	297602	1.77	297602	1.77
4	VIPUL BANSAL	211415	1.26	211415	1.26
5	SUMIT P DESAI (HUF)	170000	1.01	170000	1.01
6	PRAFULCHANDRA ANANTRAI DESAI	142980	0.85	0	0.00
7	KUSH RAKESH KUMAR GUPTA	7036	0.04	142736	0.85
8	DESAI NIRAL NEERAV	141572	0.84	93408	0.56
9	PRAMOD KUMAR RAJPUT	106000	0.63	78852	0.47
10	NIRAJ RAJNIKANT SHAH	0	0.00		
11	KAMAL VISARIA	100000	0.60	100000	0.60
12	VIKAS GUPTA	17618	0.10	92913	0.55
13	JYOTIVARDHAN JAIPURIA	90622	0.54	70496	0.42

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
1	TARUN DHIR				
	At the beginning of the year	1209821	7.20		
	Change during the Year	0	0.00		
	At the end of the year			1209821	7.20
2	MADHUKAR SHETH				
	At the beginning of the year	775995	4.62		
	Change during the Year				
	14-Aug-2020	2002		777997	4.63
	21-Aug-2020	353		778350	4.63
	28-Aug-2020	2248		780598	4.65
	18-Sep-2020	1481		782079	4.66
	18-Dec-2020	1194		783273	4.66
At the end of the year			775995	4.66	
3	RITA DHAWAN				
	At the beginning of the year	297602	1.77		
	Change during the Year	0	0.00		
	At the end of the year			297602	1.77
4	VIPUL BANSAL				
	At the beginning of the year	211415	1.26		
	Change during the Year	0	0.00		
	At the end of the year			211415	1.26
5	SUMIT P DESAI (HUF)				
	At the beginning of the year	170000	1.01		
	Change during the Year	0	0.00		
	At the end of the year			170000	1.01
6	PRAFULCHANDRA ANANTRAI DESAI				
	At the beginning of the year	142980	0.85		
	Change during the Year				
	26-Feb-2021	-142980		0	0.00
At the end of the year			0	0.00	
7	KUSH RAKESH KUMAR GUPTA				
	At the beginning of the year	7036	0.04		
	Change during the Year				
	24-Apr-2020	1000		8036	0.05
01-May-2020	4000		12036	0.07	

	08-May-2020	4420		16456	0.10
	22-May-2020	2509		18965	0.11
	29-May-2020	4500		23465	0.14
	05-Jun-2020	8041		31506	0.19
	12-Jun-2020	8653		40159	0.24
	26-Jun-2020	20905		61064	0.36
	30-Jun-2020	2000		63064	0.38
	03-Jul-2020	6653		69717	0.42
	10-Jul-2020	1500		71217	0.42
	17-Jul-2020	1891		73108	0.44
	31-Jul-2020	4200		77308	0.46
	14-Aug-2020	6223		83531	0.50
	21-Aug-2020	19723		103254	0.61
	28-Aug-2020	14356		117610	0.70
	04-Sep-2020	-9788		107822	0.64
	11-Sep-2020	4673		112495	0.67
	18-Sep-2020	18640		131135	0.78
	25-Sep-2020	-1218		129917	0.77
	30-Sep-2020	-26322		103595	0.62
	23-Oct-2020	300		103895	0.62
	30-Oct-2020	-4000		99895	0.59
	06-Nov-2020	30		99925	0.60
	20-Nov-2020	-3286		96639	0.58
	27-Nov-2020	-13500		83139	0.50
	04-Dec-2020	-6564		76575	0.46
	11-Dec-2020	-5073		71502	0.43
	18-Dec-2020	-2106		69396	0.41
	15-Jan-2021	-66693		2703	0.02
	22-Jan-2021	116		2819	0.02
	05-Feb-2021	6204		9023	0.05
	26-Feb-2021	6509		15532	0.09
	05-Mar-2021	15246		30778	0.18
	19-Mar-2021	34245		65023	0.39
	26-Mar-2021	10350		75373	0.45
	31-Mar-2021	67363		142736	0.85
	At the end of the year			142736	0.85
8	DESAI NIRAL NEERAV				
	At the beginning of the year	141572	0.84		
	Change during the Year				
	15-Jan-2021	-28121		113451	0.68
	22-Jan-2021	-20043		93408	0.56
	At the end of the year			93408	0.56
9	PRAMOD KUMAR RAJPUT				
	At the beginning of the year	106000	0.63		
	Change during the Year				
	24-Apr-2020	-3000		103000	0.61
	01-May-2020	-1611		101389	0.60
	08-May-2020	-1389		100000	0.60
	15-May-2020	500		100500	0.60
	29-May-2020	-500		100000	0.60
	08-Jan-2021	-5000		95000	0.57
	15-Jan-2021	-20294		74706	0.44
	22-Jan-2021	-1333		73373	0.44
	29-Jan-2021	1627		75000	0.45
	05-Feb-2021	1000		76000	0.45
	12-Feb-2021	-1000		75000	0.45
	19-Feb-2021	-4010		70990	0.42
	26-Feb-2021	4010		75000	0.45
	19-Mar-2021	399		75399	0.45
	26-Mar-2021	2601		78000	0.46
	31-Mar-2021	852		78852	0.47
	At the end of the year			78852	0.47
10	NIRAJ RAJNIKANT SHAH				
	At the beginning of the year	0	0.00		
	Change during the Year				
	05-Mar-2021	93500		93500	0.56
	12-Mar-2021	10000		103500	0.62
	At the end of the year			103500	0.62
11	KAMAL VISARIA				

	At the beginning of the year	100000	0.60		
	Change during the Year	0	0.00		
	At the end of the year			100000	0.60
12	VIKAS GUPTA				
	At the beginning of the year	17618	0.10		
	Change during the Year				
	03-Apr-2020	5976		23594	0.14
	10-Apr-2020	17099		40693	0.24
	17-Apr-2020	6935		47628	0.28
	24-Apr-2020	8203		55831	0.33
	01-May-2020	2000		57831	0.34
	08-May-2020	2366		60197	0.36
	29-May-2020	4644		64841	0.39
	05-Jun-2020	1500		66341	0.40
	10-Jul-2020	6173		72514	0.43
	31-Jul-2020	1800		74314	0.44
	14-Aug-2020	2000		76314	0.45
	21-Aug-2020	743		77057	0.46
	28-Aug-2020	4251		81308	0.48
	04-Sep-2020	-8850		72458	0.43
	18-Sep-2020	3115		75573	0.45
	25-Sep-2020	-5981		69592	0.41
	30-Sep-2020	3162		72754	0.43
	09-Oct-2020	9253		82007	0.49
	16-Oct-2020	7615		89622	0.53
	20-Nov-2020	-15000		74622	0.44
	27-Nov-2020	-3500		71122	0.42
	04-Dec-2020	-3449		67673	0.40
	18-Dec-2020	-2000		65673	0.39
	08-Jan-2021	530		66203	0.39
	15-Jan-2021	-50527		15676	0.09
	22-Jan-2021	284		15960	0.10
	29-Jan-2021	-1000		14960	0.09
	19-Feb-2021	128		15088	0.09
	26-Feb-2021	7421		22509	0.13
	12-Mar-2021	2353		24862	0.15
	19-Mar-2021	10804		35666	0.21
	26-Mar-2021	12000		47666	0.28
	31-Mar-2021	45247		92913	0.55
	At the end of the year			92913	0.55
13	JYOTIVARDHAN JAIPURIA				
	At the beginning of the year	90622	0.54		
	Change during the Year				
	08-Jan-2021	1000		91622	0.55
	26-Mar-2021	-21000		70622	0.42
	31-Mar-2021	-126		70496	0.42
	At the end of the year			70496	0.42

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
1	Naresh Kumar Bansal				
	At the beginning of the year	6212578	36.99		
	Change during the Year	177270	1.06		
	At the end of the year			6389848	38.05
2	Richi Bansal				
	At the beginning of the year	1469287	8.75		
	Change during the Year	0	0.00		
	At the end of the year			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
Indebtedness at the beginning of the financial year				
i) Principal Amount	6861.12	59.94	NIL	6921.06
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
Total (i+ii+iii)	6861.12	59.94	NIL	6921.06
Change in Indebtedness during the financial year				
* Addition	56475.87	465.96	NIL	56941.83
* Reduction	55919.35	324.58	NIL	56243.93
Net Change	556.52	141.38	NIL	697.90
Indebtedness at the end of the financial year				
i) Principal Amount	7417.64	201.32	NIL	7618.96
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
Total (i+ii+iii)	7417.64	201.32	NIL	7618.96

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. 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	45.61	39.91	3.20	88.72
	(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	-	-	-	-
	Total (A)	46.01	40.31	3.37	89.69
	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 rd 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. Jai Prakash Gupta	Mrs. Anju Gupta	
1	Independent Directors					
	Fee for attending board committee meetings	0.40	0.20	0.20	0.35	1.15
	Remuneration by way of Commission	--	--		-	--
	Others, please specify	--	--		-	--
	Total (1)	0.40	0.20	0.20	0.35	1.15
2	Other Non-Executive Directors					
	Fee for attending board committee meetings	--	--		--	--
	Commission	--	--		--	--
	Others, please specify	--	--		--	--
	Total (2)	--	--		--	--
	Total (B)=(1+2)					1.15
	Total Managerial Remuneration Total=(A+B)					90.84

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	5.06	18.22	23.28
	(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	-	-	-
	Total	5.06	18.22	23.28

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)
A. COMPANY					
Penalty					
Punishment					
Compounding					
B. DIRECTORS					
Penalty					
Punishment					
Compounding					
C. OTHER OFFICERS IN DEFAULT					
Penalty					
Punishment					
Compounding					