

1. Name of Listed Entity: Vasa Retail and Overseas Ltd
2. Scrip Code/Name of Scrip/Class of Security: VASA
3. Share Holding Pattern Filed under: 31b
4. Share Holding Pattern as on : 30-Sep-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	Promoter and Promoter 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?	No	

Table I - Summary Statement holding of specified securities

Category ry (I)	Category of shareholder (II)	Nos. of shareh olders (III)	No. of fully paid up equity	No. of Partly paid-up equity	No. of shares underlying Depository	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as	Number of Voting Rights held in each class of securities (IX)			No. of Shares Underlying	Shareholding , as a % assuming full conversion	Number of Locked in shares		Number of Shares pledged or		Number of equity shares held
			shares	shares	Receipts	(VII) =	per SCRR,				Outstanding	of convertible	(XII)		otherwise	in	
			held	shares	(VI)	(IV)+(V)+	1957)	convertible	securities (as a	No. (a)	As a % of total Shar	No. (a)			As a % of total Share	(XIV)	
			(IV)	held	(VI)	(VI)	(VIII)	securities	percentage of								
				(V)				(including	diluted share				Warrants)	capital)			
								As a % of					(X)	(XI)= (VII)+(X)			
								(A+B+C2)		Clas s	Clas s	Tot al	Total as a % of (A+B+	As a % of			

								eg: X	eg:y		C)		(A+B+C2)		es held (b)		s held (b)	
A	Promoter & Promoter Group	3	4208510	0	0	4208510	70.23	4208510	0	4208510	70.23	0	70.23	1200000	28.51			4208510
B	Public	202	1784040	0	0	1784040	29.77	1784040	0	1784040	29.77	0	29.77		0			1784000
C	Non Promoter- Non Public	0	0	0	0	0	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		0			0
C2	Shares held by Employee Trusts	0	0	0	0	0	0	0	0	0	0	0	0		0			0
	Total	205	5992550	0	0	5992550	100	5992550	0	5992550	100	0	100	1200000	20.02			5992510

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

	Category & Name of the Shareholders (I)	PAN (II)	No. of shareh older (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII = IV+V+VI)	Shareholding % calculate d as 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 conversion of convertible securities (as a percentage of diluted share capital) (XI) = (VII)+(X) as a % of A+B+C2	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialized form (XIV)
									No of Voting Rights			Total as a % of Total Voting rights			No. (a)	As a % of total Shares held (b)	No. (a)	As a % of total share s held (b)	
									Class X	Class Y	Total								
1	Indian		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0
a	Individuals/Hindu undivided Family		2	3030430	0	0	3030430	50.57	3030430	0	3030430	50.57	0	50.57	1200000	39.6			3030430
	HARDIK BHUPENDRA VASA	AAA PV4669A	1	1979630	0	0	1979630	33.03	1979630	0	1979630	33.03	0	33.03	812000	41.02			1979630
	KAJAL HARDIK VASA	AAB PP4223B	1	1050800	0	0	1050800	17.54	1050800	0	1050800	17.54	0	17.54	388000	36.92			1050800
b	Central Government/ State Government(s)		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
d	Any Other (specify)		1	1178080	0	0	1178080	19.66	1178080	0	1178080	19.66	0	19.66	0	0			1178080
	Director or		1	1178080	0	0	1178080	19.66	1178080	0	1178080	19.66	0	19.66	0	0			1178080

	Director's Relatives			80			0		80		8080							
	ARUNA BHUPENDRA VASA	AAC PV5850H	1	1178080	0	0	1178080	19.66	1178080	0	1178080	19.66	0	19.66	0	0		1178080
	Sub-Total (A)(1)		3	4208510	0	0	4208510	70.23	4208510	0	4208510	70.23	0	70.23	1200000	28.51		4208510
2	Foreign		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
a	Individuals (Non-Resident Individuals/ Foreign Individuals)		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
b	Government		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
c	Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
d	Foreign Portfolio Investor		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
e	Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
	Sub-Total (A)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0		0
	Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)		3	4208510	0	0	4208510	70.23	4208510	0	4208510	70.23	0	70.23	1200000	28.51		4208510

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 share	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total nos. shares held $\text{VII} = \text{IV} + \text{V} + \text{VI}$	Shareholding % calculate d as per SCRR, 1957	Number of Voting Rights held in each class of securities (IX)	No. of Shares Underlying Outstanding convertible securities	Total shareholding , as a % assuming full	Number of Locked in shares (XII)	Number of Shares pledged or otherwise encumbered (XIII)	Number of equity shares held in dematerialized form
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				s held (IV)				As a % of (A+B+C2) VIII	No of Voting Rights			Total as a % of Total Voting rights	(including Warrants) (X)	conversion of convertible securities (as a percentage of diluted share capital)	No. (a)	As a % of total Shar es held (b)	No. (No t ap pli ca ble) (a)	As a % of total share s held (Not applic able) (b)	(XIV)
									Class X	Class Y	Tot al								
1	Institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a	Mutual Funds/		0	0	0	0	0	0	0	0	0	0	0	0		0			0
b	Venture Capital Funds		0	0	0	0	0	0	0	0	0	0	0	0		0			0
c	Alternate Investment Funds		0	0	0	0	0	0	0	0	0	0	0	0		0			0
d	Foreign Venture Capital Investors		0	0	0	0	0	0	0	0	0	0	0	0		0			0
e	Foreign Portfolio Investors		0	0	0	0	0	0	0	0	0	0	0	0		0			0
f	Financial Institutions/ Banks		0	0	0	0	0	0	0	0	0	0	0	0		0			0
g	Insurance Companies		0	0	0	0	0	0	0	0	0	0	0	0		0			0
h	Provident Funds/ Pension Funds		0	0	0	0	0	0	0	0	0	0	0	0		0			0
i	Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0		0			0
	Sub-Total (B)(1)		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0
2	Central Government/ State		0	0	0	0	0	0	0	0	0	0	0	0		0			0

	Government(s))/ President of India																		
	Sub-Total (B)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0			0
3	Non- institutions		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
a	Individuals -		189	165970	15	0	1659715	27.69	16597015	0	1659715	27.69	0	27.69	0	0	0	0	1659675
i	Individual shareholders holding nominal share capital up to Rs. 2 lakhs.		177	987710	5	0	987715	16.48	9877105	0	987715	16.48	0	16.48		0			987675
ii	Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs.		12	672000	0	0	672000	11.21	6720000	0	672000	11.21	0	11.21		0			672000
	PRADEEP UPPALA	AAZ PU39 59M	1	132000	0	0	132000	2.2	1320000	0	132000	2.2	0	2.2		0			132000
	UTSAV PRAMOD SRIVASTAV	AQG PS76 69M	1	200000	0	0	200000	3.34	2000000	0	200000	3.34	0	3.34		0			200000
b	NBFCs registered with RBI		0	0	0	0	0	0	0	0	0	0	0	0		0			0
c	Employee Trusts		0	0	0	0	0	0	0	0	0	0	0	0		0			0
d	Overseas Depositories (holding DRs)		0	0	0	0	0	0	0	0	0	0	0	0		0			0

	(balancing figure)																		
e	Any Other (specify)		13	124325	0	0	124325	2.07	124325	0	124325	2.07	0	2.07		0			124325
	Bodies Corporate		4	12325	0	0	12325	0.21	12325	0	12325	0.21	0	0.21		0			12325
	Clearing member		3	12000	0	0	12000	0.2	12000	0	12000	0.2	0	0.2		0			12000
	Non-Resident Indian (NRI)		6	100000	0	0	100000	1.67	100000	0	100000	1.67	0	1.67		0			100000
	Sub-Total (B)(3)		202	1784040	0	0	1784040	29.76	1784040	0	1784040	29.76	0	29.76	0	0			1784000
	Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)		202	1784040	0	0	1784040	29.76	1784040	0	1784040	29.76	0	29.76	0	0			1784000

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

	Category & Name of the Shareholders (I)	PAN (II)	No. of shareh	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	Nos. of shares underlying Depository Receipts (VI)	Total no. shares held (VII = IV+V+VI)	Sharehol ding % calculate d as per SCRR, 1957 As a % of (A+B+C2) (VIII)	Number of Voting Rights held in each class of securities (IX)				No. of Shares Underlying Outstanding convertible securities (including Warrants) (X)	Total shareholdin g , as a % assuming full conversion of convertible securities (as a percentage of diluted share capital) (XI)	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerializ ed form (XIV) (Not Applicable)
			(III)							No of Voting Rights			Total as a % of Total Voting rights		No.	As a % of total Shar es held	No. (No t ap pli ca ble)	As a % of total share s held (Not applic able)	
										Class X	Class Y	Tot al							
1	Custodian/DR Holder		0	0	0	0	0	0	0	0	0	0	0	0	0			0	
2	Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014)		0	0	0	0	0	0	0	0	0	0	0	0	0			0	
	Total Non-Promoter-Non Public Shareholding (C)= (C)(1)+(C)(2)		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

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	

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 %