

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

1.	Name of Listed Entity: SPaisa Capital Limited
2.	Scrip Code/Name of Scrip/Class of Security: 540776
3.	Share Holding 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.	Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-

	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?		No

* 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.

GENERATED ON :03/01/2023 NSDL : 31/12/2022 CDSL :31/12/2022

Spaisa Capital Limited

Corporate Identity Number: L67190MH2007PLC289249

Corporate Office/ Regd. Office: IIFL House, Sun Infotech Park, Road No. 16V, Plot No. B-23, MIDC, Thane Industrial Area, Wagle Estate, Thane - 400604. E-mail: csteam@spaisa.com • Website: www.spaisa.com



Spaisa Capital Limited

Table I - Summary Statement holding of specified securities

Category	Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding as a % of total no. of shares (calculate as per SCRR, 1957)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including securities)	Shareholding, as a % assuming full conversion of convertible securities	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
								No of Voting Rights		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)		
								Class eg: X	Class eg: Y									Total
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii) =	(viii) As a	(ix)	(x)	(xi)=	(xii)		(xiii)		(xiv)			
(A)	Promoter & Promoter Group	7	10010698	0	0	10010698	32.6874	10010698	0	10010698	32.6874	0	32.6874	9114698	91.0495	0	0.0000	10010698
(B)	Public	24997	20611870	0	0	20611870	67.3028	20611870	0	20611870	67.3028	0	67.3028	0	0.0000	NA	NA	20610551
(C)	Non Promoter - Non Public																	
(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	1	3000	0	0	3000	0.0098	0	0	0	0.0000	0	0.0098	0	0.0000	NA	NA	3000
	Total	25005	30625568	0	0	30625568	100.0000	30622568	0	30622568	100.0000	0	100.0000	9114698	29.7617	0	0.0000	30624249

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Spaisa Capital Limited

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

Category & Name of the shareholders	Entity Type	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding	Shareholding, as a % assuming full conversion of convertible securities (including securities)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
									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 Shares held(b)		
									Class eg: X	Class eg: Y									(X)
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii) =	(viii) As a	(ix)	(x)	(xi)=	(xii)	(xiii)	(xiv)						
1	Indian																		
(a)	Individuals / Hindu Undivided Family		5	9850698	0	0	9850698	32.1649	9850698	0	9850698	32.1649	0	32.1649	9114698	92.5284	0	0.0000	9850698
	Nirmal Bhanwarlal Jain	Promoters	ABRPJ9235G	1	6080088	0	6080088	19.8530	6080088	0	6080088	19.8530	0	19.8530	6080088	100.0000	0	0.0000	6080088
	Madhu N Jain	Promoters	ABEPJ6034E	1	1845016	0	1845016	6.0244	1845016	0	1845016	6.0244	0	6.0244	1845016	100.0000	0	0.0000	1845016
	Venkataraman Rajamani	Promoters	ADHPR6633G	1	1189594	0	1189594	3.8843	1189594	0	1189594	3.8843	0	3.8843	1189594	100.0000	0	0.0000	1189594
	Aditi Avinash Athavankar	Promoters	AADTK0762E	1	720000	0	720000	2.3510	720000	0	720000	2.3510	0	2.3510	0	0.0000	0	0.0000	720000
	Aditi Athavankar	Promoters	AACPA0090J	1	16000	0	16000	0.0522	16000	0	16000	0.0522	0	0.0522	0	0.0000	0	0.0000	16000
(b)	Central Government / State Government(s)		0	0	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	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(d)	Any Other (Specify)		2	1600000	0	0	1600000	0.5224	1600000	0	1600000	0.5224	0	0.5224	0	0.0000	0	0.0000	1600000
	Persons Acting In Concert		2	1600000	0	0	1600000	0.5224	1600000	0	1600000	0.5224	0	0.5224	0	0.0000	0	0.0000	1600000
	Ardent Impex Pvt Ltd	Promoter Group	AAECA7631G	1	1080000	0	1080000	0.3526	1080000	0	1080000	0.3526	0	0.3526	0	0.0000	0	0.0000	1080000
	Orpheus Trading Pvt Ltd	Promoter Group	AAACO7172N	1	52000	0	52000	0.1698	52000	0	52000	0.1698	0	0.1698	0	0.0000	0	0.0000	52000
	Sub Total (A)(1)		7	10010698	0	0	10010698	32.6874	10010698	0	10010698	32.6874	0	32.6874	9114698	91.0496	0	0.0000	10010698
2	Foreign																		
(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	0
(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)		7	10010698	0	0	10010698	32.6874	10010698	0	10010698	32.6874	0	32.6874	9114698	91.0496	0	0.0000	10010698

Details of Shares which remain unclaimed may be given hear along with details such as number of shareholders, outstanding shares held in demat/unclaimed suspense account, voting rights which are frozen etc.

Note :

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

(2) The term 'Encumbrance' has the same meaning as assigned under regulation 28(3) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

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Spaisa Capital Limited
Table III - Statement showing shareholding pattern of the Public shareholder

Category & Name of the shareholders	PAN	Nos. of shareholders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculate d as per SCRR, 1957 As a % of (A+B+C2)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including	Shareholding, as a % assuming full conversion of convertible securities (XII)=	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	Sub-categorization of shares				
								No. of Voting Rights	Total as % of Total Voting Rights	Total			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)		Shareholding(No. of shares) under	sub-category(i)	sub-category(ii)	sub-category(iii)	
(i)	(ii)	(iii)	(iv)	(v)	(vi)	(vii) =	(viii) As a % of (A+B+C2)	(ix)	(x)	(xi)	(xii)	(xiii)	(xiv)	(xv)	(xvi)	(xvii)	(xviii)	(xix)	(xx)	(xxi)	(xxii)	
1 Institutions (Domestic)																						
(a) Mutual Fund		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b) Venture Capital Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(c) Alternate Investment Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(d) Banks		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(e) Insurance Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(f) 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				
(g) Asset Reconstruction Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(h) Sovereign Wealth Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(i) 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				
(j) Other Financial Institutions		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(k) 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 Institutions (Foreign)																						
(a) Foreign Direct Investment		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b) Foreign Venture Capital Investors		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(c) Sovereign Wealth Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(d) Foreign Portfolio Investors Category I		9	7315916	0	0	7315916	23.8883	7315916	0	7315916	23.8883	0	23.8883	0	0.0000	NA	NA	7315916	0	0	0	0
Wf Asian Reconnaissance Fund Limited	AABCW5771E	1	2905906	0	0	2905906	9.4885	2905906	0	2905906	9.4885	0	9.4885	0	0.0000	NA	NA	2905906	0	0	0	0
Hwic Asia Fund Class A Shares	AAAC04504G	1	2570186	0	0	2570186	8.3923	2570186	0	2570186	8.3923	0	8.3923	0	0.0000	NA	NA	2570186	0	0	0	0
Bank Muscat India Fund	AADC84040P	1	1007856	0	0	1007856	3.2909	1007856	0	1007856	3.2909	0	3.2909	0	0.0000	NA	NA	1007856	0	0	0	0
Labco Limited	AADCL3788Q	1	433444	0	0	433444	1.4153	433444	0	433444	1.4153	0	1.4153	0	0.0000	NA	NA	433444	0	0	0	0
Foreign Portfolio Investors Category II		1	170	0	0	170	0.0006	170	0	170	0.0006	0	0.0006	0	0.0000	NA	NA	170	0	0	0	0
Overseas Depositories(holding DRs) (balancing figure)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(g) 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)(2)		10	7316086	0	0	7316086	23.8888	7316086	0	7316086	23.8888	0	23.8888	0	0.0000	NA	NA	7316086	0	0	0	0
3 Central Government/ State Government(s)																						
(a) Central Government / President of India		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b) State Government / Governor		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
Shareholding by Companies or Bodies Corporate where Central / State Government is a promoter		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
Sub Total (B)(3)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
4 Non-Institutions																						
(a) Associate companies / Subsidiaries		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
Directors and their relatives (excluding Independent Directors and nominee Directors)		3	4127	0	0	4127	0.0135	4127	0	4127	0.0135	0	0.0135	0	0.0000	NA	NA	4127	0	0	0	0
(c) Key Managerial Personnel		2	70240	0	0	70240	0.2294	70240	0	70240	0.2294	0	0.2294	0	0.0000	NA	NA	70240	0	0	0	0
Relatives of promoters (other than 'immediate relatives' of promoters disclosed under 'Promoter and Promoter Group' category)		4	259649	0	0	259649	0.8478	259649	0	259649	0.8478	0	0.8478	0	0.0000	NA	NA	259649	0	0	0	0
Trusts where any person belonging to 'Promoter and Promoter Group' category is 'trustee', 'beneficiary', or 'author of the trust'		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(f) Investor Education and Protection Fund (IEPF)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(g) i. Resident individual holding nominal share capital up to Rs. 2 lakhs.		24126	2355412	0	0	2355412	7.6910	2355412	0	2355412	7.6910	0	7.6910	0	0.0000	NA	NA	2354093	0	0	0	0
ii. Resident individual holding nominal share capital in excess of Rs. 2 lakhs.		18	1579600	0	0	1579600	5.1578	1579600	0	1579600	5.1578	0	5.1578	0	0.0000	NA	NA	1579600	0	0	0	0
(i) Non Resident Indians (NRIs)		357	791604	0	0	791604	2.5848	791604	0	791604	2.5848	0	2.5848	0	0.0000	NA	NA	791604	0	0	0	0
Paraja Bharat Himattal	AHMPP5003B	1	615471	0	0	615471	2.0097	615471	0	615471	2.0097	0	2.0097	0	0.0000	NA	NA	615471	0	0	0	0
(j) Foreign Nationals		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(k) Foreign Companies		1	7670130	0	0	7670130	25.0449	7670130	0	7670130	25.0449	0	25.0449	0	0.0000	NA	NA	7670130	0	0	0	0
Fin Mauritius Investments Ltd	AACCF5236C	1	7670130	0	0	7670130	25.0449	7670130	0	7670130	25.0449	0	25.0449	0	0.0000	NA	NA	7670130	0	0	0	0
(l) Bodies Corporate		121	441818	0	0	441818	1.4426	441818	0	441818	1.4426	0	1.4426	0	0.0000	NA	NA	441818	0	0	0	0
(m) Any Other (Specify)		355	123204	0	0	123204	0.4023	123204	0	123204	0.4023	0	0.4023	0	0.0000	NA	NA	123204	0	0	0	0
Body Corp-Ltd Liability Partnership		3	2969	0	0	2969	0.0097	2969	0	2969	0.0097	0	0.0097	0	0.0000	NA	NA	2969	0	0	0	0
Hindu Undivided Family		338	108909	0	0	108909	0.3556	108909	0	108909	0.3556	0	0.3556	0	0.0000	NA	NA	108909	0	0	0	0
Clearing Member		14	11326	0	0	11326	0.0370	11326	0	11326	0.0370	0	0.0370	0	0.0000	NA	NA	11326	0	0	0	0
Sub Total (B)(4)		24987	13295784	0	0	13295784	43.4140	13295784	0	13295784	43.4140	0	43.4140	0	0.0000	NA	NA	13294465	0	0	0	0
Total Public Shareholding (B)= (B)(1)+(B)(2)+(B)(3)+b(4)		24997	20611870	0	0	20611870	67.3028	20611870	0	20611870	67.3028	0	67.3028	0	0.0000	NA	NA	20610551	0	0	0	0

Details of the shareholders acting as persons in Concert including their Shareholding (No. and %):

No. of shareholders	No. of Shares	%
3	160000	0.5224

Details of Shares which remain unclaimed may be given hear 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 Shares
0	0

Note :

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII) is not applicable in the above format.
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.
- (4) Categorization and disclosure of each shareholder category should be carried out in the order prescribed in the above format. If a shareholder is falling under more than one category, then the same shall be classified in the category
- (5) Sub-categorization of shares under column no.(XV) will be based on shareholding(no. of shares) under the following sub-categories:
 - (i) Shareholder who are represented by a nominee Director on the board of the listed entity or have the right to nominate a representative(i.e. Director)on the board of the listed entity.
 - (ii) Shareholder who have entered into shareholder agreement with the listed entity.
 - (iii) Shareholders acting as persons in concert with promoters.

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Spaisa Capital Limited

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

	Category & Name of the shareholders (I)	PAN (II)	Nos. of shareholders (III)	No. of fully paid up equity shares held (IV)	Partly paid-up equity shares held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII) =	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII) As a % of (A+B+C) (IX)	Number of Voting Rights held in each class of securities			No. of Shares Underlying Outstanding convertible securities (including securities convertible into equity securities) (X)	Shareholding, as a % assuming full conversion of convertible securities (XI) =	Number of Locked in shares (XII)		Number of Shares pledged or otherwise encumbered (XIII)		Number of equity shares held in dematerialised form (XIV)	
									No of Voting Rights					Total as a % of (A+B+C) (X)	No. (a)	As a % of total Shares held(b)	No. (a)		As a % of total Shares held(b)
									Class eg: X	Class eg: Y	Total								
1	Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	NA	NA	0		
2	Employee Benefit Trust / Employee Welfare Trust under SEBI (Share based Employee Benefits and Sweat Equity) Regulations, 2021		1	3000	0	0	3000	0.0098	3000	0	3000	0.0098	0	0.0098	0	0.0000	NA	NA	3000
	Total Non-Promoter- Non Public Shareholding (C)= (C1)+(C2)		1	3000	0	0	3000	0.0098	3000	0	3000	0.0098	0	0.0098	0	0.0000	NA	NA	3000

Note :

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII) is not applicable in the above format.
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available.

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Table V – Details of Significant Beneficial Owners (SBO)

Sr. No.	Details of the SBO			Details of the Registered owner			Details of holdings/exercise of right of the SBO in reporting company, whether direct or indirect:					Date of creation / acquisition of significant beneficial interest	
	Name	PAN	Nationality	Name	PAN	Nationality	Whether by virtue of:						
							Shares	Voting rights	Rights on distributable dividend on any other distribution	Exercise of control	Exercise of significant influence		
1	Nirmal Jain and Madhu Jain Collectively	ABRPJ9235G	India	Orpheus Trading Private Limited	AAACO7172N	India	0.17				No	No	20-10-2017
2	Nirmal Jain and Madhu Jain Collectively	ABRPJ9235G	India	Ardent Impex Private Limited	AAECA7631G	India	0.35				No	No	20-10-2017

5paisa Capital Limited

Corporate Identity Number: L67190MH2007PLC289249

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Table VI – Statement showing foreign ownership limits		
Particulars	Approved Limits (%)	Limits Utilized (%)
As on shareholding date	100	50.51
As on the end of previous 1 st quarter	100	50.57
As on the end of previous 2 nd quarter	100	52.55
As on the end of previous 3 rd quarter	100	52.56
As on the end of previous 4 th quarter	100	52.57

Spaisa Capital Limited

Corporate Identity Number: L67190MH2007PLC289249

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