

**FORM No. MGT-9**  
**EXTRACT OF ANNUAL**  
**RETURN**  
**For the year ended 31.03.2021**  
**[Pursuant to Section 92(3) of the Companies Act, 2013 and**  
**Rule 12(1) of the Companies (Management and Administration) Rules,**  
**2014]**

**I. REGISTRATION AND OTHER DETAILS:**

i)	<b>CIN:</b>	L74899DL1993PLC054781
ii)	<b>Registration Date</b>	10.08.1993
iii)	<b>Name of the Company:</b>	Rathi Bars Limited
iv)	<b>Category/ Sub-Category of the Company:</b>	Public Limited Company having share Capital
v)	<b>Address of Registered Office:</b>	A-24/7, Mohan Co-Operative Industrial Estate, Mathura Road, New Delhi- 110044
vi)	<b>Contact Details:</b>	011-4316 5400
vii)	<b>Whether listed Company or Not</b>	Yes
viii)	<b>Name, Address and Contact details of Registrar and Transfer Agent, if any:</b>	MAS Services Limited T-34, Second Floor, Okhla Industrial Area, Phase II, New Delhi-110020 Ph: 011-2638 7281-83

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

All the business activities contributing 10 % or more of the total turnover of the company shall be stated

S. No.	Name and Description of main products/services	NIC Code of the Product/service	% to total turnover of the Company
1	Manufacture & Trading of Steel Bars, Ingots/Billets	241	100

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES: N.A.**

[No. of Companies for which information is being filled]

S. No.	Name and Address of the Company	CIN/GLN	Holding/Subsidiary / Associate	% of Shares Held	Applicable Section
1	--	--	--	--	--

**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)**

**i) Category-wise Share Holding**

Category of Shareholders	No. of Shares held at the beginning of theyear [As on 01-April-2020]				No. of Shares held at the end of the year [As on 31-March-2021]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoters</b>									
<b>(1) Indian</b>									
a) Individual/ HUF	52,69,410	0	52,69,410	32.27	52,69,410	0	52,69,410	32.27	-
b) Central Govt.	0	0	0	0	0	0	0	0	-
c) State Govt.	0	0	0	0	0	0	0	0	-
d) Bodies Corp.	51,83,702	0	51,83,702	31.74	51,83,702	0	51,83,702	31.74	-
e) Banks / FI	0	0	0	0	0	0	0	0	-
f) Any other	0	0	0	0	0	0	0	0	-
<b>Sub-total (A) (1):-</b>	<b>1,04,53,112</b>	<b>0</b>	<b>1,04,53,112</b>	<b>64.01</b>	<b>1,04,53,112</b>	<b>0</b>	<b>1,04,53,112</b>	<b>64.01</b>	<b>-</b>
<b>(2) Foreign</b>									
a) NRIs - Individuals	0	0	0	0	0	0	0	0	-
b) Other - Individuals	0	0	0	0	0	0	0	0	-
c) Bodies Corp.	0	0	0	0	0	0	0	0	-
d) Banks / FI	0	0	0	0	0	0	0	0	-
e) Any Other	0	0	0	0	0	0	0	0	-
<b>Sub-total (A) (2):-</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-</b>
<b>Total share-holding of Promoter (A)= (A)(1)+ (A)(2)</b>	<b>1,04,53,112</b>	<b>0</b>	<b>1,04,53,112</b>	<b>64.01</b>	<b>1,04,53,112</b>	<b>0</b>	<b>1,04,53,112</b>	<b>64.01</b>	<b>-</b>

<b>B. Public Shareholding</b>									
<b>1. Institutions</b>	-	-	-	-	-	-	-	-	-
a) Mutual Funds	0	0	0	0	0	0	0	0	-
b) Banks / FI	223	0	223	0	173	0	173	0.00	0.00
c) Central Govt	0	0	0	0	0	0	0	0	-
d) State Govt (s)	0	0	0	0	0	0	0	0	-
e) Venture Capital Funds	0	0	0	0	0	0	0	0	-
f) Insurance Companies	0	0	0	0	0	0	0	0	-
g) FIIs	0	0	0	0	0	0	0	0	-
h) Foreign Venture Capital Funds	0	0	0	0	0	0	0	0	-
i) Others (specify)	0	0	0	0	0	0	0	0	-
<b>Sub-total (B) (1):-</b>	0	0	0	0	0	0	0	0	-
<b>2. Non-Institutions</b>									
a) Bodies Corp.	1,13,214	0	1,13,214	0.69	1,96,598	0	1,96,598	1.20	0.51
i) Indian	-	-	-	-	-	-	-	-	-
ii) Overseas	-	-	-	-	-	-	-	-	-
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 2 Lakh	38,35,041	38	38,35,041	23.48	38,30,764	38	38,30,764	23.46	-0.02
ii) Individual shareholders holding nominal share capital in excess of Rs. 2 Lakh	16,67,637	1,06,500	17,74,137	10.86	16,86,251	0	16,86,251	10.33	-0.53

c) Others (specify)									
(c-i) NRI/OCB	1,38,342	0	1,38,342	0.50	1,16,016	0	1,16,016	0.71	0.21
(c-ii)-clearing member	16,288	0	16,288	0.10	47,443	0	47,443	0.29	0.19
<b>Sub-total (B)(2):-</b>	<b>57,70,207</b>	<b>1,06,538</b>	<b>58,77,245</b>	<b>35.99</b>	<b>58,77,034</b>	<b>38</b>	<b>58,77,072</b>	<b>35.99</b>	<b>-</b>
Total Public Shareholding (B)=(B)(1)+(B)(2)	57,70,207	1,06,538	58,77,245	35.99	58,77,034	38	58,77,072	35.99	-
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>					0	0	0	0	-
<b>Grand Total (A+B+C)</b>	<b>1,62,23,319</b>	<b>1,06,538</b>	<b>1,63,30,357</b>	<b>100.00</b>	<b>1,63,30,319</b>	<b>38</b>	<b>1,63,30,357</b>	<b>100.00</b>	<b>-</b>

ii) Shareholding of Promoter's (Including Promoter Group) Shareholding -

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	Kamlesh K Rathi	8,18,387	5.01	-	15,001	0.09	-	-4.92
2	Anurag Rathi	12,16,751	7.45	-	12,16,751	7.45	-	-
3	Parnika Rathi	9,88,109	6.05	-	9,88,109	6.05	-	-
4	Uddhav Rathi	8,59,330	5.26	-	8,59,330	5.26	-	-
5	Anurag Rathi (HUF)	5,07,500	3.11	-	5,07,500	3.11	-	-
6	Pushpa Rathi	7,68,519	4.71	--	15,71,905	9.63	-	+4.92
7	Nandita Rathi	77,269	0.47	-	77,269	0.47	-	-
8	Advika Rathi	16,773	0.10	-	16,773	0.10	-	-
9	Devanshi Rathi	16,772	0.10	-	16,772	0.10	-	-
10	Bhuvneshwari Leasing & Finance Private Ltd	2,75,625	1.69	-	2,75,625	1.69	-	-

11	Eleventh Hour Leasing And Finance Pvt Limited	3,71,875	2.28	-	3,71,875	2.28	-	-
12	Maryada Holding Private Limited	1,71,675	1.05	-	1,71,675	1.05	-	--
13	Parnika Investments Private Limited	6,69,375	4.10	-	6,69,375	4.10	-	-
14	Pranika Leasing And Finance Private Limited	2,64,250	1.62	-	2,64,250	1.62	-	-
15	Rathi Overseas Private Limited	6,56,250	4.02	-	6,56,250	4.02	-	-
16	Vasudev Exports Private Limited	5,10,475	3.13	-	5,10,475	3.13	-	-
17	Sarveshwar Cereals P Ltd	6,57,825	4.03	-	6,57,825	4.03	-	-
18	Amrit Krishi Farms Pvt. Ltd	4,63,250	2.84	-	4,63,250	2.84	-	-
19	Rathi Breweries Private Limited	4,32,445	2.65	-	4,32,445	2.65	-	-
20	Uddhav Leasing & Finance P Ltd	2,77,375	1.70	-	2,77,375	1.70	-	-
21	Uddhav Investment P Ltd	2,16,125	1.32	-	2,16,125	1.32	-	-
22	Pushpkamal Enterprises P Ltd	2,17,157	1.33	-	2,17,157	1.33	-	-
		<b>1,04,53,112</b>	<b>64.01</b>		<b>1,04,53,112</b>	<b>64.01</b>		

### iii) Change in Promoters' (Including Promoter Group) Shareholding

S. No	Name of Share holders	Shareholding at the beginning of the year		Cumulative Share -holding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	Kamlesh Kumar Rathi				
	At the beginning of the year	8,18,387	5.01		
	Increase/Decrease in Shareholding during the year	-8,03,386	-4.92		
	At the end of the year	15,001	0.09	15,001	0.09
2	Anurag Rathi				
	At the beginning of the year	12,16,751	7.45		
	Increase in Shareholding during the year	0			
	At the end of the year	12,16,751	7.45	12,16,751	7.45
3	Parnika Rathi				

	At the beginning of the year	9,88,109	6.05		
	Increase in Shareholding during the year	0			
	At the end of the year	9,88,109	6.05	9,88,109	6.05
4	Uddhav Rathi				
	At the beginning of the year	8,59,330	5.26		
	Increase in Shareholding during the year	0			
	At the end of the year	8,59,330	5.26	8,59,330	5.26
5	Pushpa Rathi				
	At the beginning of the year	7,68,519	4.71		
	Increase in Shareholding during the year	8,03,386	4.92		
	At the end of the year	15,71,905	9.63	15,71,905	9.63
6	Nandita Rathi				
	At the beginning of the year	77,269	0.47		
	Increase in Shareholding during the year	0			
	At the end of the year	77,269	0.47	77,269	0.47

iv) Shareholding Pattern of Top10 Shareholders (OTHER THAN Directors, Promoters and Holders of GDRs and ADRs)

S. No		Date	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.	<b>Mahendra Girdharilal</b> At the beginning of the year		2,27,211	1.39	2,27,211	1.39
	Date wise Increase/ Decrease in Share holding during the year specifying the reasons for increase/ decrease (e.g. allotment / transfer /bonus/ sweat equity etc):		NIL	NIL	NIL	NIL
	<b>At the end of the year</b>		<b>2,27,211</b>	<b>1.39</b>	<b>2,27,211</b>	<b>1.39</b>
2.	<b>Renu</b> At the beginning of the year		97,211	0.59	97,211	0.59
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/sweat equity etc): Transfer	03.04.2020	14		97,225	
		10.04.2020	1,579		98,804	
		17.04.2020	3,253		1,02,057	
		24.04.2020	530		1,02,587	
		01.05.2020	5,579		1,08,166	
		08.05.2020	7,834		1,16,000	
		15.05.2020	10,000		1,26,000	
		22.05.2020	7,960		1,33,960	
		29.05.2020	2,924		1,36,884	
		05.06.2020	4,868		1,41,752	
		12.06.2020	1,400		1,43,152	
		19.06.2020	7		1,43,159	
		30.06.2020	1,000		1,44,159	
		17.07.2020	1		1,44,160	
		11.09.2020	20,690		1,64,850	
		18.09.2020	1,500		1,66,350	
		22.09.2020	977		1,67,327	
		25.09.2020	767		1,68,094	
		30.09.2020	1,235		1,69,329	

		16.10.2020	1,948		1,71,277	
		23.10.2020	2,498		1,73,775	
		30.10.2020	1,150		1,74,925	
		06.11.2020	1,000		1,75,925	
		13.11.2020	548		1,76,473	
		20.11.2020	4,594		1,81,067	
		27.11.2020	2,813		1,83,880	
		26.02.2021	1		1,83,881	
	<b>At the end of the year</b>		<b>1,83,881</b>	<b>1.13</b>	<b>1,83,881</b>	<b>1.13</b>
3.	<b>Cubical Financial Services Limited</b>		0		0	
	At the beginning of the year					
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase decrease (e.g. allotment / transfer /bonus/ sweat equity etc): Transfer	05.03.2021	95,580		95,580	
		12.03.2021	10,891		106,471	
		19.03.2021	48,248		154,719	
		26.03.2021	8,000		162,719	
	<b>At the end of the year</b>		<b>1,62,719</b>	<b>1</b>	<b>1,62,719</b>	<b>1</b>
4.	<b>Jhanwar Lal Dhariwal</b>		1,11,583	0.68	1,11,583	0.68
	At the beginning of the year					
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / transfer /bonus/ sweat equity etc):		NIL	NIL	NIL	NIL
	<b>At the end of the year</b>		<b>1,11,583</b>	<b>0.68</b>	<b>1,11,583</b>	<b>0.68</b>
5.	<b>V L Narasimhan</b>		1,06,500	0.65		
	At the beginning of the year					
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/ sweat equity etc):	04.07.2020	-106500	NIL		
		19.02.2021	+106500			
	At the end of the year		1,06,500	0.65	1,06,500	0.65
6.	<b>Narpat Singh</b>		79,068	0.48	79,068	0.48
	At the beginning of the year					
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / transfer /bonus/ sweat equity etc): Transfer	25.12.2020	8,606		87,674	
		08.01.2021	1,000		88,674	
		21.02.2021	3,657		92,331	
	<b>At the end of the year</b>		<b>92,331</b>	<b>0.57</b>	<b>92,331</b>	<b>0.57</b>

7.	<b>Himmat Singh</b> At the beginning of the year		74,295	0.455	74,295	0.455
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / <u>transfer</u> /bonus/ sweat equity etc): Transfer	10.04.2020 17.04.2020 30.10.2020 13.11.2020 20.11.2020 11.12.2020 18.12.2020 25.12.2020 08.01.2021 15.01.2021 22.01.2021 29.01.2021 19.03.2021	6,953 540 7,599 1,769 4,006 4,900 10,668 (1,800) (26,411) (3,949) 5,067 (21,000) 10,000		81,248 81,788 89,387 91,156 95,162 1,00,062 1,10,730 1,08,930 82,519 78,570 83,637 62,637 72,637	
	<b>At the end of the year</b>		<b>72,637</b>	<b>0.44</b>	<b>72,637</b>	<b>0.44</b>
8.	<b>Padma Rajawat</b> At the beginning of the year		60,629	0.37	60,629	0.37
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / transfer /bonus/ sweat equity etc): Transfer	24.04.2020	1,000		61,629	
	<b>At the end of the year</b>		<b>61,629</b>	<b>0.38</b>	<b>61,629</b>	<b>0.38</b>
9.	<b>Shanti Devi Dhariwal</b> At the beginning of the year		56,570	0.35	56,570	0.35
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / transfer /bonus/ sweat equity etc):		NIL	NIL	NIL	
	<b>At the end of the year</b>		<b>56,570</b>	<b>0.35</b>	<b>56,570</b>	<b>0.35</b>
10.	<b>Anish Jindal</b> At the beginning of the year		0	0	0	0
	Date wise Increase/Decrease in Share holding during the year specifying the reasons for increase/decrease (e.g. allotment / transfer /bonus/ sweat equity etc):	31.12.2020 01.01.2021 08.01.2021 05.02.2021	10,000 2,571 7,500 34,530		10,000 12,571 20,071 54,601	
	<b>At the end of the year</b>		<b>54,601</b>	<b>0.33</b>	<b>54,601</b>	<b>0.33</b>

**i) Shareholding of Directors and Key Managerial Personnel:**

S.N.	Shareholding of each Director and Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Share -holding during the year	
		No. of shares	% of total shares of the co.	No. of shares	% of total shares of the co
1.	<b>Kamlesh Kumar Rathi</b> At the beginning of the year	<b>8,18,387</b>	<b>5.01</b>		
	Change in Shareholding during the	-8,03,386	-4.92	-	-

	year (various times):				
	<b>At the end of the year</b>	<b>15,001</b>	<b>0.09</b>	<b>15,001</b>	<b>0.09</b>
2.	<b>Anurag Rathi</b> At the beginning of the year	<b>12,16,751</b>	<b>7.45</b>		
	Change in Shareholding during the year (various times):	-	-	-	-
	<b>At the end of the year</b>	<b>12,16,751</b>	<b>7.45</b>	<b>12,16,751</b>	<b>7.45</b>
3.	<b>Uddhav Rathi</b> At the beginning of the year	<b>8,59,330</b>	<b>5.26</b>	-	-
	Date wise Increase in Shareholding during the year specifying the reasons for increase:	-	-	-	-
	<b>At the end of the year</b>	<b>8,59,330</b>	<b>5.26</b>	<b>8,59,330</b>	<b>5.26</b>

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

	<b>Secured Loans excluding deposits</b>	<b>Unsecured Loans</b>	<b>Deposits</b>	<b>Total Indebtedness</b>
<b>Indebtedness at the beginning of the Financial year</b>				
i) Principal Amount	40,86,00,657	-	-	40,86,00,657
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	<b>40,86,00,657</b>	<b>-</b>	<b>-</b>	<b>40,86,00,657</b>
<b>Change in Indebtedness during the Financial year</b>				
* Addition	6,33,46,301	-	-	6,33,46,301
* Reduction	-	-	-	-
<b>Net Change</b>	<b>6,33,46,301</b>	<b>-</b>	<b>-</b>	<b>6,33,46,301</b>
<b>Indebtedness at the end of the Financial Year</b>				
i) Principal Amount	47,19,46,958	-	-	47,19,46,958
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	<b>47,19,46,958</b>	<b>-</b>	<b>-</b>	<b>47,19,46,958</b>

**VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

**A. Remuneration to Managing Director, Whole-time Directors and/or Manager: (In lakhs)**

S. N.	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
1		Kamlesh Kumar Rathi (MD)- demised in Dec2020	Anurag Rathi (MD)	Uddhav Rathi		
	Gross salary	-	29.15	-	-	29.15
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961.	-	-	-	-	-
	(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 (A)</b>	-	29.15	-	-	29.15
	<b>Ceiling as per the Act</b>	-	84.00	-	-	84.00

**B. Remuneration to other Directors:**

SN.	Particulars of Remuneration	Name of Directors				Total (Rs.)
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1	Independent Directors					
	Fee for attending board committee meetings					
	Commission					
	Others, please specify					
	Total (1)					
2	Other Non-Executive Directors					
	Fee for attending board committee meetings					
	Commission					
	Others(Working as Asst Mgr-HRD )					
	Total (2)					
	Total (B)=(1+2)					
	Total Managerial Remuneration					
	Overall Ceiling as per the Act					

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

SN	Particulars of Remuneration	Key Managerial Personnel			
		CEO	CS	CFO	Total
1	Gross salary	-	1.10	-	1.10
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	-	-	-	-
	(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	-	1.10	-	1.10

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

*The Company received a notice from the Bombay Stock Exchange for non-compliance of various regulations of SEBI (LODR), 2015 on 14.12.2020 imposing a penalty of Rs. 38,58,560 (including GST) and freezing of Demat accounts of the promoters wherein a detailed reply was submitted to the satisfaction of the BSE due to which penalty to the extent of Rs. 31,49,380/- was waived off on 01.01.2021 and rest of the amount was deposited under protest seeking hearing opportunity and defreezing of Demat accounts of the Promoters.*

By order of the Board of Directors  
**FOR RATHI BARS LIMITED**

Date: 03.09.2021  
Place: New Delhi

Sd/-  
**Anurag Rathi**  
**(Managing Director)**  
**DIN:00063345**

Sd/-  
**Uddhav Rathi**  
**(WTD and CFO)**  
**DIN:06604905**