### Form No. MGT-7

## Annual Return (other than OPCs and Small Companies)

[Pursuant to sub-section (1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11 of the Companies (Management and Administration) Rules, 2014]

All fields marked in \* are mandatory

Refer instruction kit for filing the form



### Form language

I REGISTRATION AND OTHER DETAILS

i \*Corporate Identity Number (CIN)

U27320CT2017PLC007918

ii (a) \*Financial year for which the annual return is being filed (From date) (DD/MM/YYYY)

(b) \*Financial year for which the annual return is being filed (To date) (DD/MM/YYYY)

31/03/2025

(c) \*Type of Annual filing

© Original

Revised

iii

Particulars	As on filing date	As on the financial year end date			
Name of the company	SAMBHV STEEL TUBES LIMITED	SAMBHV STEEL TUBES LIMITED			
Registered office address	Office No. 501 to 511 Harshit Corporate, Amanaka,NA,Raipur,Raipur,Chattisgarh,India,49 2001	Office No. 501 to 511 Harshit Corporate, Amanaka,NA,Raipur,Raipur,Chattisgarh,India,49 2001			
Latitude details	21.253143171	21.253143171			
Longitude details	81.59694356	81.59694356			

(a) *Photograph of the register showing external building	red office of the Company and name prominently visible	REG OFFICE PHOTO.pdf
(b) *Permanent Account Numb	per (PAN) of the company	AA*****OC
(c) *e-mail ID of the company		****sambhv.com
(d) *Telephone number with S	TD code	77*****60

(e) Website								
iv *Date of Incorporatio	n (DD/M/M	1/2222)						
iv Date of incorporatio	וו (טט/ ועווע	24/0	)4/2017					
v (a) *Class of Compan (Private company/F		Public company						
(b) *Category of the (		Com	pany limited by shares					
(Indian Non-Gover	nment com	ny (as on the financial year end d pany/Union Government Company/St npany/Subsidiary of Foreign Company	ate Government Compar	l l	n Non-Government company			
vi *Whether company is	s having sh	are capital (as on the financial ye	ar end date)	Yes	S O No			
/ii (a) Whether shares l	isted on re	ecognized Stock Exchange(s)		○ Yes	S No			
(b) Details of stock e	exchanges	where shares are listed						
S. No.	Stock Ex	change Name		Code				
···· Normalis and Constitution		f A						
viii Number of Registrar	and Irans	fer Agent		1				
CIN of the Registrar a Transfer Agent	nd	Name of the Registrar and Transfer Agent	Registered office ad the Registrar and Tr Agents		SEBI registration number of Registrar and Transfer Agent			
U72400TG2017PLC	117649	Kfin Technologies Limited	Selenium, Tower-B, 31 & 32, Gachibowli District, Tanakrar Hyderabad Telang 032, India	, Financial nguda, ana 500				
x * (a) Whether Annual	General N	Neeting (AGM) held		Yes	S O No			
(b) If yes, date of AG	iM (DD/MI		29/09/2025					
(c) Due date of AGM	I (DD/MM,	30/0	9/2025					
(d) Whether any ext	ension for	AGM granted		○ Yes	s • No			
(e) If yes, provide th filed for extensi		Request Number (SRN) of the GNL	-1 application form					

(f) E	Extended due date of AGM	after grant of exte	ension (D	D/MM/YYYY)					
(g)	Specify the reasons for not	holding the same	<u>:</u>						
PRIN	CIPAL BUSINESS ACTIVITIES	S OF THE COMPAN	NY						
i *Nur	mber of business activities					1			
S. No.	Main Activity group code	Description of I	Main	Business Act Code	ivity	Descripti Business		% of turnove the company	
1	С	Manufactu	ıring	24			ture of basic etals	100	
	FICULARS OF HOLDING, SU  . of Companies for which in			COMPANIES (	NCLUDING	G JOINT VE			
S. No.	1 '			Other registration Name of the number company		0,		/Associate/Jo e	% of share held

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1	U27209CT2020PTC010822		SAMBHV TUBES PRIVATE LIMITED	Subsidiary	100
2	U35105MH2023PTC415117		CLEAN MAX OPIA PRIVATE LIMITED	Associate	26

### IV SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

### i SHARE CAPITAL

(a) Equity share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of equity shares	1000000000.00	241002000.00	241002000.00	241002000.00
Total amount of equity shares (in rupees)	10000000000.00	2410020000.00	2410020000.00	2410020000.00

lumber of classes						1			
Class of shares  EQUITY SHARES		Authorised Ca	pital	Issued capital		Subscribed Capi	tal	Paid Up capital	
Number of equity shares		10000000	000	241002000	)	241002000	1	241002000	
Nominal value per share (in ru	oees)	10		10		10		10	
Total amount of equity shares rupees )	(in	1000000000	00.00	2410020000	.00	2410020000	)	2410020000	
b) Preference share capital Particulars	Author	ised Capital	Issue	d capital	Suk	oscribed capital	Pai	d Up capital	
Total number of preference shares		0.00		0.00		0.00		0.00	
Total amount of preference shares (in rupees)		0.00		0.00		0.00		0.00	
lumber of classes						0			
Class of shares		Authorised Ca	pital	Issued capital		Subscribed Capit	al	Paid Up capital	
Number of preference shares									
Nominal value per share (in ru	pees)								
Total amount of preference sh	ares (in								

**Authorised Capital** 

**Particulars** 

Total amount of unclassified shares	0

### (d) Break-up of paid-up share capital

Particulars	1	Number of share	es	Total Nominal Amount	Total Paid-up amount	Total premium	
	Physical DEMAT Total		Total				
(i) Equity shares							
At the beginning of the year	241002000	0	241002000.00	2410020000	2410020000		
Increase during the year	0.00	238528000.00	238528000.00	2385280000.0 0	2385280000.0 0	0	
i Public Issues	0	0	0.00	0	0		
ii Rights issue	0	0	0.00	0	0		
iii Bonus issue	0	0	0.00	0	0		
iv Private Placement/ Preferential allotment	0	0	0.00	0	0		
v ESOPs	0	0	0.00	0 0			
vi Sweat equity shares allotted	0	0	0.00	0	0		
vii Conversion of Preference share	0	0	0.00	0	0		
viii Conversion of Debentures	0	0	0.00	0	0		
ix GDRs/ADRs	0	0	0.00	0	0		
x Others, specify  DUE TO DEMAT		238528000		2385280000	2385280000		
Decrease during the year	238528000.00	0.00	238528000.00	2385280000.0 0	2385280000.0 0	0	
i Buy-back of shares	0	0	0.00	0	0		
ii Shares forfeited	0	0	0.00	0	0		
iii Reduction of share capital	0	0	0.00	0	0		
iv Others, specify							
DUE TO DEMAT	238528000		238528000.00	2385280000	2385280000		
At the end of the year	2474000.00	238528000.00	241002000.00	2410020000.0 0	2410020000.0 0		
(ii) Preference shares							

Particulars		Number of share	es	Total Nominal Amount	Total Paid-up amount	Total premium	
At the beginning of the year	0	0	0.00	0	0		
Increase during the year	0.00	0.00	0.00	0.00	0.00	0	
i Issues of shares	0	0	0.00	0	0		
ii Re-issue of forfeited shares	0	0	0.00	0	0		
iii Others, specify			0				
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0	
i Redemption of shares	0	0	0.00	0	0		
ii Shares forfeited	0	0	0.00	0	0		
iii Reduction of share capital	0	0	0.00	0	0		
iv Others, specify							
			0				
At the end of the year	0.00	0.00	0.00	0.00	0.00		
ISIN of the equity shares of the compa	ny			INE12NJ01	018		
ii Details of stock split/consolidation dur	ing the year (for	each class of sha	ares)	0			
Class of sha	res						
Before split / Consolidation	Number of sl	nares					
	Face value po	er share					
After split / consolidation	Number of sl	nares					
	Face value pe	er share					
iii Details of shares/Debentures Transfer since the incorporation of the compar		ate of last financ	ial year (or in the	e case of the first	return at any tin	ne	
Nil							

Number of transfers					11		
tachments:							
1. Details of shares/Debentures Tran	sfers	Trans	fer D	etails.xlsm			
Debentures (Outstanding as at the end of tall a) Non-convertible debentures	financial year)						
Number of classes					0		
Classes of non-convertible debentures	Number of uni	its		Nominal va per unit	lue		value tanding at the f the year)
Total							
Classes of non-convertible debentures	Outstanding as the beginning of the year		ncrea the ye	ase during ear	Decrease during the	year	Outstanding as at the end of the year
Total							
Partly convertible debentures							
Number of classes					0		
Classes of partly convertible debentures	Number of uni	its		Nominal va per unit	lue		value tanding at the f the year)
Total							
Classes of partly convertible debentures	Outstanding as the beginning the year			ease during year	Decrease during the	e year	Outstanding as at the end of the year
Total							
		1			1		

Number of classes	5							0		
Classes of fully convertible debentures		res			per unit (		(Out	Total value (Outstanding at the end of the year)		
Total										
Classes of fully co	nvertible debentur	res	Outstanding as a the beginning of the year		Increas the yea	se durir ar	ng	Decrease during the y	ear .	Outstanding as at the end of the year
Total										
Summary of Inde	btedness			·						
			anding as at eginning of the	Incre the y	ease du year	uring		crease ing the year		utstanding as at e end of the year
Particulars		the be								
<b>Particulars</b> Non-convertible d	ebentures	the be	eginning of the		year			ing the year		e end of the year
<b>Particulars</b> Non-convertible d	debentures	the be	0.00		<b>year</b> 0.00			0.00		e end of the year
Particulars  Non-convertible d  Partly convertible	debentures	the be	0.00		0.00 0.00			0.00 0.00		0.00 0.00
Particulars  Non-convertible d  Partly convertible  Fully convertible of	debentures	the be	0.00 0.00 0.00 0.00		0.00 0.00 0.00			0.00 0.00 0.00		0.00 0.00 0.00
Total	ebentures debentures debentures	benture	0.00 0.00 0.00 0.00	the y	0.00 0.00 0.00			0.00 0.00 0.00 0.00	th	0.00 0.00 0.00

V Turnover and net worth of the company (as defined in the Companies Act, 2013)

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ii \* Net worth of the Company

4960479414.75

### VI SHARE HOLDING PATTERN

### **A Promoters**

S. No	Category	Equity		Pref	ference	
		Number of shares	Percentage	Number of shares	Percentage	
1	Individual/Hindu Undivided Family					
	(i) Indian	89099750	36.97	0	0.00	
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00	
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00	
2	Government					
	(i) Central Government	0	0.00	0	0.00	
	(ii) State Government	0	0.00	0	0.00	
	(iii) Government companies	0	0.00	0	0.00	
3	Insurance companies	0	0.00	0	0.00	
4	Banks	0	0.00	0	0.00	
5	Financial institutions	0	0.00	0	0.00	
6	Foreign institutional investors	0	0.00	0	0.00	
7	Mutual funds	0	0.00	0	0.00	
8	Venture capital	0	0.00	0	0.00	
9	Body corporate (not mentioned above)	0	0.00	0	0.00	

10	Others				
	Total	89099750.00	36.97	0.00	0

Total number of shareholders (promoters)

6
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### **B Public/Other than promoters**

S. No	Category	Equity		Pref	ference
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	139390774	57.84	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	532000	0.22	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	11804476	4.90	0	0.00

1	.0	Others					
		AIF	175000	0.07			
		Total	151902250.00	63.03	C	0.00	0
То	Total number of shareholders (other than promoters)					480	
To	Total number of shareholders (Promoters + Public/Other than promoters)					486.00	

Breakup of total number of shareholders (Promoters + Other than promoters)

SI.No	Category	
1	Individual - Female	0
2	Individual - Male	0
3	Individual - Transgender	0
4	Other than individuals	486
	Total	486.00

C Details of Foreign institutional investors'	(FIIs) holding shares of the company
C Details of Foreign institutional investors	i iisi iiolullig siiales ol tile collipally

Name of the	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held

# VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS [Details of Promoters, Members (other than promoters), Debenture holders]

Details	At the beginning of the year	At the end of the year
Promoters	6	6
Members (other than promoters)	129	480
Debenture holders	0	0

### **VIII DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

### A Composition of Board of Directors

Category	Number of did beginning of t		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year		
	Executive	Non- executive	Executive	Non- executive	Executive	Non- executive	
A Promoter	2	0	2	0	15.38	0	
B Non-Promoter	1	0	1	3	1.94	0.00	
i Non-Independent	1	0	1	0	1.94	0	
ii Independent	0	0	0	3	0	0	
C Nominee Directors representing	0	0	0	0	0.00	0.00	
i. Banks and FIs	0	0	0	0	0	0	
ii Investing institutions	0	0	0	0	0	0	
iii Government	0	0	0	0	0	0	
iv Small share holders	0	0	0	0	0	0	
v Others	0	0	0	0	0	0	
Total	3	0	3	3	17.32	0.00	

<sup>\*</sup>Number of Directors and Key managerial personnel (who is not director) as on the financial year end date

9
9

### B (i) Details of directors and Key managerial personnel as on the closure of financial year

Name	DIN/PAN	Designation	Number of equity shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
NIDHI THAKKAR	07587986	Director	0	
SURESH KUMAR GOYAL	00318141	Director	18536250	
VIKAS KUMAR GOYAL	00318182	Managing Director	18536250	
BHAVESH KHETAN	10249740	Director	4666660	
KISHORE KUMAR SINGH	00097156	Director	0	

MANOJ KHETAN	06395265	Director	0	
VIKAS KUMAR GOYAL	00318182	CEO	18536250	
NIRAJ SHRIVASTAVA	CGBPS1019N	Company Secretary	0	
ANU GARG	BRBPG4465Q	CFO	80000	

B (ii)	*Particulars o	f change in	director(s) an	d Key managerial	personnel	during the year
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7			

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation (DD/MM/YYYY)	Nature of change (Appointment/ Change in designation/ Cessation)
KISHORE KUMAR SINGH	00097156	Director	12/09/2024	Appointment
MANOJ KHETAN	06395265	Director	12/09/2024	Appointment
NIDHI THAKKAR	07587986	Director	12/09/2024	Appointment
VIKAS KUMAR GOYAL	00318182	CEO	01/06/2024	Appointment
VIKAS KUMAR GOYAL	00318182	Managing Director	01/06/2024	Change in designation
NIRAJ SHRIVASTAVA	CGBPS1019N	Company Secretary	01/07/2024	Appointment
ANU GARG	BRBPG4465Q	CFO	01/07/2024	Appointment

### IX MEETINGS OF MEMBERS/CLASS OF MEMBERS/ BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

### A MEMBERS/CLASS / REQUISITIONED / NCLT/COURT CONVENED MEETINGS

*Number	of meetings l	held
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7
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Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Extra-Ordinary General Meeting	24/04/2024	137	20	72.65
Extra-Ordinary General Meeting	27/04/2024	137	21	77.64

Extra-Ordinary General Meeting	30/05/2024	137	20	72.65
Extra-Ordinary General Meeting	05/08/2024	137	20	77.63
Extra-Ordinary General Meeting	28/08/2024	137	20	77.63
Extra-Ordinary General Meeting	12/09/2024	137	21	77.64
Annual General Meeting	18/09/2024	137	28	77.85

### **B BOARD MEETINGS**

\*Number of meetings held

16

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	01/04/2024	3	3	100
2	05/04/2024	3	3	100
3	22/04/2024	3	3	100
4	02/05/2024	3	3	100
5	01/06/2024	3	3	100
6	04/06/2024	3	3	100
7	01/07/2024	3	3	100
8	09/07/2024	3	3	100
9	02/08/2024	3	3	100
10	05/09/2024	3	3	100
11	12/09/2024	3	3	100
12	12/09/2024	6	5	83.33
13	28/09/2024	6	6	100
14	30/09/2024	6	5	83.33

15	23/12/2024	6	5	83.33
16	25/01/2025	6	5	83.33

### **C COMMITTEE MEETINGS**

Number of meetings held	N	umbe	r of	meetings	held
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11			

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	12/09/2024	4	2	50
2	Audit Committee	28/09/2024	4	4	100
3	Audit Committee	30/09/2024	4	3	75
4	Audit Committee	28/01/2025	4	3	75
5	Nomination And Remuneration Committee	31/03/2025	3	3	100
6	Corporate Social Responsibility Committee	01/04/2024	2	2	100
7	Corporate Social Responsibility Committee	31/03/2025	3	3	100
8	Stakeholders Relationship Committee	28/03/2025	4	4	100
9	Risk Management Committee	28/03/2025	3	2	66.67
10	Finance Committee	30/01/2025	3	2	66.67
11	Finance Committee	18/03/2025	3	2	66.67

### **D ATTENDANCE OF DIRECTORS**

S. N	Name of the	Board Meetings	Committee Meetings	Whether attended AGM
o	Director			held on

		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attenda nce	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attend ance	29/09/2025 (Y/N/NA)
1	VIKAS KUMAR GOYAL	16	16	100	9	8	88	Yes
2	BHAVESH KHETAN	16	16	100	2	2	100	Yes
3	KISHORE KUMAR SINGH	5	4	80	5	3	60	Yes
4	MANOJ KHETAN	5	5	100	6	6	100	Yes
5	NIDHI THAKKAR	5	2	40	10	6	60	Yes
6	SURESH KUMAR GOYAL	16	16	100	5	5	100	Yes

A DEWILLIED VILUX	OF DIRECTORS AND	KEN MANIAGEDIAL	DEDCONNEL

l NIII

A *Number of Managing Director, Whole-time Directors and/or Manager
whose remuneration details to be entered

1			

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	VIKAS KUMAR GOYAL	Managing Director	18000000	0	0	0	18000000.00
	Total		18000000.00	0.00	0.00	0.00	18000000.00

В	*Number of	CEO,	CFO and Compa	ny secretar	y whose rem	uneration
	details to b	e ento	ered			

3			

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	ANU GARG	CFO	2811000				2811000.00
2	VIKAS KUMAR GOYAL	CEO	18000000				18000000.00
3	NIRAJ SHRIVASTAVA	Company Secretary	1345161				1345161.00
	Total		22156161.00	0.00	0.00	0.00	22156161.00

C*N	umber of	other	directors	whose	remuneration	details to	be entered
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2			

S. No.	Name	Designatio	on Gross salary	Commission	Stock Option Sweat equity		Total amount
1	SURESH KUMAR GOYAL	Directo	or 18000000				18000000.00
2	BHAVESH KHETAN	Directo	or 9000000				9000000.00
	Total		27000000.00	0.00	0.00	0.00	27000000.00
(I MATTERS	S RELATED TO CERTI	FICATION OI	F COMPLIANCES AN	D DISCLOSURES			
	r the company has m ins of the Companies			s in respect of ap	oplicable (	Yes	○ No
If No, give	reasons/observatio	ns					
II PENALTY	Y AND PUNISHMENT	– DETAILS 1	THEREOF				
*DETAILS	OF PENALTIES / PUN RS/OFFICERS	ISHMENT IN	IPOSED ON COMPAI	NY/	Nil		
*DETAILS (	RS/OFFICERS  the Name o court/ c	f the oncerned	Date of Order (DD/MM/YYYY)	Name of the A section under penalised / pu	Act and Deta		Details of appeal (if any) including present status
*DETAILS ( DIRECTO  Name of company directors	RS/OFFICERS  the Name o court/ c	f the oncerned	Date of Order	Name of the A	Act and Deta	lty/	(if any) including
*DETAILS ( DIRECTO  Name of company directors officers	RS/OFFICERS  the Name o court/ c Authorit	f the oncerned ty	Date of Order (DD/MM/YYYY)	Name of the A section under penalised / pu	Act and Deta which pena unished punis	lty/	(if any) including
*DETAILS ( DIRECTO  Name of company directors officers	RS/OFFICERS  the Name o court/ c	f the oncerned ty	Date of Order (DD/MM/YYYY)	Name of the A	Act and Deta which pena unished punis	lty/	(if any) including
*DETAILS ( DIRECTO  Name of company directors officers	RS/OFFICERS  The Name o court/ c Authorit  OF COMPOUNDING the Name o court/ c	f the oncerned ty  OF OFFENCE	Date of Order (DD/MM/YYYY)	Name of the A section under penalised / pu	Act and Deta pena punished punished punished which Parti	lty/ chment:	(if any) including
*DETAILS ( DIRECTO  Name of company directors officers  *DETAILS ( Name of company directors	RS/OFFICERS  The Name o court/ c Authorit  OF COMPOUNDING the Name o court/ c	f the oncerned ty  OF OFFENCE	Date of Order (DD/MM/YYYY)	Name of the A section under	Act and Deta pena punished punished punished which Parti	lty/ chment:	Amount of compounding (in
*DETAILS ( DIRECTO  Name of company directors officers  *DETAILS ( Name of company directors	RS/OFFICERS  The Name o court/ c Authorit  OF COMPOUNDING the Name o court/ c	f the oncerned ty  OF OFFENCE	Date of Order (DD/MM/YYYY)	Name of the A section under	Act and Deta pena punished punished punished which Parti	lty/ chment:	Amount of compounding (in
*DETAILS ( DIRECTO  Name of company directors officers  *DETAILS ( Name of company directors officers	RS/OFFICERS  The Name o court/ c Authorit  OF COMPOUNDING the Name o court/ c	f the oncerned ty  OF OFFENCE  f the oncerned ty	Date of Order (DD/MM/YYYY)  S  Date of Order (DD/MM/YYYY)	Name of the A section under	Act and Deta pena punished punished punished which Parti	lty/ chment:	Amount of compounding (in
*DETAILS ( DIRECTO  Name of company directors officers  *DETAILS ( Name of company directors officers	RS/OFFICERS  i the Name o court/ c Authorit  OF COMPOUNDING ( i the Name o court/ c Authorit)	oncerned ty  OF OFFENCE  f the oncerned ty  benture hold	Date of Order (DD/MM/YYYY)  Date of Order (DD/MM/YYYY)  der	Name of the A section under	Act and Deta pena punished punished punished which Parti	lty/ chment:	Amount of compounding (in

#### **XIV Attachments**

(a) List of share holders, debenture holders

SAMB-31.03.2025-Details of Shareholder.xlsm

(b) Optional Attachment(s), if any

SAMBHV STEEL\_MGT-8.pdf LIST OF SHAREHOLDER\_SAMBHV STEEL.pdf CLARIFICATION LETTER.pdf LIST OF SHARE TRANSFER.pdf

#### XV COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

#### I/We certify that:

- (a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
- (b) Unless otherwise expressly stated to the contrary elsewhere in this return, the Company has complied with applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of

SAMBHV STEEL TUBES LIMITED

as required to be

maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on

(DD/MM/YYYY)

31/03/2025

In my/our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we certify that:

- A The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B During the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:
- 1 its status under the Act;
- 2 maintenance of registers/records & making entries therein within the time prescribed therefor;
- 3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/beyond the prescribed time;
- 4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
- 5 closure of Register of Members / Security holders, as the case may be.
- 6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
- 7 contracts/arrangements with related parties as specified in section 188 of the Act;
- 8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;

9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act

- 10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
- 11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per subsections (3), (4) and (5) thereof;
- 12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
- 13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
- 14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
- 15 acceptance/ renewal/ repayment of deposits;
- 16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;
- 17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act;
- 18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

o be digitally signed by	
Jame	Rohtash Kumar Agrawal
Date (DD/MM/YYYY)	08/12/2025
Place	Raipur
Vhether associate or fellow:	
Associate	
ertificate of practice number	4*1*
VI Declaration under Rule 9(4) of the Companies (Management and Administrat	ion) Rules, 2014
(a) DIN/PAN/Membership number of Designated Person	00318182
(b) Name of the Designated Person	VIKAS KUMAR GOYAL
Declaration	
am authorised by the Board of Directors of the Company vide resolution number*	* 16 dated*
DD/MM/YYYY) 24/05/2025 to sign this form and declare tha	t all the requirements of Companies Act, 2013

and the rules made thereunder in respect of the subject matter of this form and matter with. I further declare that:  1 Whatever is stated in this form and in the attachments thereto is true, correct and subject matter of this form has been suppressed or concealed and is as per the original 2. All the required attachments have been completely and legibly attached to this form	d complete and no information material to the ginal records maintained by the company.
*To be digitally signed by	
*Designation	Director
(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))	
*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator	0*3*8*8*
*To be digitally signed by	
*Whether associate or fellow:	
○ Associate ⑤ Fellow	
Membership number	8*5*
Certificate of practice number	
Note: Attention is drawn to provisions of Section 448 and 449 of the Companies Adstatement / certificate and punishment for false evidence respectively.	ct, 2013 which provide for punishment for fals
For office use only:	
Form Service request number (SRN)	AB9683528
	10/12/2025
eForm filing date (DD/MM/YYYY)	



### List of Share Transfer 2024-2025

TYPE OF SHARE

: Equity

AMOUNT PER SHARE ('):

10/-

DATE OF REGISTRA- TION OF TRANSFER OF SHARES	NO. OF SHARES TRANS- FERRED	L/F OF TRANSFE- ROR	TRANSFEROR'S NAME	L/F OF TRANSFE- REE	TRANSFEREE'S NAME
05/04/2024	477660	33	Shashank Goyal	19	Bhavesh Khetan
05/04/2024	1296250	28	Manoj Goyal	02	Vikas Kumar Goyal
05/04/2024	1296250	28	Manoj Goyal	05	Ashish Goyal
05/04/2024	1296250	28	Manoj Goyal	01	Suresh Goyal
05/04/2024	1296250	28	Manoj Goyal	03	Brijlal Goyal
05/04/2024	2908660	7	Rinku Goyal	04	Kaushalya Devi
05/04/2024	2908660	7	Rinku Goyal	06	Suman Goyal
05/04/2024	2908660	7	Rinku Goyal	08	Sheetal Goyal
05/04/2024	2908660	7	Rinku Goyal	09	Archana Goyal
05/04/2024	20000	31	Harsheet Goyal	152	Mayank Agrawal
05/04/2024	55000	31	Harsheet Goyal	153	Modani Dayanand Asaram HU

For, Sambhy Steel Tubes Limited

Niraj Shrivastava

Blovastors

Company Secretary and Compliance Officer

M. No.: F8459

SAMBHV STEEL TUBES LIMITED

(Formerly Known as Sambhv Sponge Power Private Limited & Sambhv Steel Tubes Private Limited)

CIN: U27320CT2017PLC007918 www.sambhv.com | info@sambhv.com Registered Office:

501-511, 5th Floor, Harshit Corporate, Amanaka, Raipur (Chhattisgarh) - 492001 India Tel: +91-771-2222360 | +91-7024116780, 1800 208 9990 Manufacturing Units:

Sarora, Tilda, Raipur (C.G.) Pin: 493114 Tel: +91-771-2222358

# ROHTASH AGRAWAL & CO. Company Secretaries

D-4, 2nd Floor, Ekatma Parisar, BJP Complex, Rajbandha Maidan, G.E. Road, RAIPUR - 492001 (C.G.) Ph.: 0771-4034876

e-mail: rohtashagrawal@yahoo.com, M.No. FCS-5537, C.P. No. 4015

Unique Code No. - S2001CG034400, Peer Review No.-2647/2022



### FORM NO. MGT-8

[Pursuant to Section 92(2) of the Companies Act, 2013 and Rule 11(2) of Companies (Management and Administration) Rules, 2014]

### **CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE**

We have examined the registers, records and books and papers of Sambhv Steel Tubes Limited (the Company) having CIN: U27320CT2017PLC007918[Formerly Known as Sambhv Steel Tubes Private Limited&Sambhv Sponge Power Private Limited as required to be maintained under the Companies Act, 2013 (the Act) and the Rules made thereunder for the Financial Year ended on 31st March, 2025. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the Company, its officers and agents, we certify that:

- **A.** The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. During the aforesaid financial year the Company has complied with provisions of the Act & Rules made thereunder in respect of\*:
  - The company has obtained approval of Members in their Extra Ordinary General Meeting held on 24th April, 2024 and converted into "Public Company" w.e.f. 24th April, 2024 and received fresh Certificate of Incorporation, consequent upon Conversion from 'Private Company' to 'Public Company' from the Registrar of Companies/Central Processing Centre dated 09th July, 2024.

Sambliv Steel Tubes Limited, 2025 - 1-



In view of this legal position, the Company for the purpose of this certification is treated as 'Limited Company' under Section 2(71) of the Companies Act, 2013, for the Financial Year ended on 31st March, 2025;

- 2. Maintenance of registers/records & making entries therein within the time prescribed therefore;
- 3. Filing of forms and returns, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within and/or beyond the prescribed limit;
- 4. Calling/convening/holding Meetings of Board of Directors or its Committees, if any, and the Meetings of the Members of the Company on due dates as stated in the Annual Return in respect of which Meetings, proper notices were givenand the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
- 5. The company was not required to close its Register of Members;
- 6. Advances/loans to its directors and/or persons or firms or companies referred in Section 185 of the Act;
- 7. Contracts/arrangements with related parties as specified in Section 188 of the Act;
- 8. transfer of shares of the company;

Save as above, there was noissue or allotment or transmission or buy back of securities/ redemption of preference shares or debentures/alteration or reduction of share capital/ conversion of shares/ securities andtherefore company was not required to issue of security certificates in any/all instances;

Sambho Steel Tubes Limited, 2025 - 2-



- 9. There were no transactions keeping in abeyance the rights to divided, right shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act;
- 10. The Company has not made declaration/payment of dividend; and not required to transfer of unpaid/unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with Section 125 of the Act;
- 11. Signing of audited Financial Statement for the **Financial year 2023-2024** as per the provisions of Section 134 of the Act and report of directors is as per sub sections (3), (4) and (5) thereof;
- 12. Constitution/reappointment/appointment/retirement/disclosureof Directors/Key Managerial Personsand the remuneration paid to them;
- 13. appointment/reappointment/filing up of casual vacancy of auditors as per the provisions of section 139 of the Act;
- 14. approval from Central Government, Registraror such other authorities under the various provisions of the Act, wherever required.
  - Save as above, the company is not required to take any approvals from the Tribunal, Regional Director or Court under the various provisions of the Act;
- 15. the Company has not made any invitation/ acceptance/ renewal/ repayment of deposits;
- 16. Borrowings from its Directors, Body Corporate and Banks and creation/modification of charges were duly made with respect to the bank borrowings.

Save as above, the Company has not made borrowings from Directors Relatives, Members, Public Financial Institutions and others and creation/modification/satisfaction of charges, in that respect, is not required;

Sambhv Steel Tubes Limited, 2025 - 3-



- 17. Loans and investments or guarantees given or providing of securities to other bodies corporate or person falling under the provisions of Section 186 of the Act;
- 18. The Company hasaltered the provisions of the Memorandum and Articles of Association of the Company.

\*Wherever not complied / not applicable given accordingly.

Place: Raipur

Date:08/12/2025

For, Rohtash Agrawal & Co.

mpany

Rohtash Kumar Agrawal

(Proprietor)

Membership No.F-5537

C. P. No. 4015

UDIN:F005537G002264981



### **CLARIFICATION LETTER**

### 1. REGARDING SHAREHOLDER'S CATEGORIES:

In Form MGT-7, under Section VI relating to the shareholding pattern, the e-form requires disclosure of the total number of shareholders classified male, female, transgender, and other individuals. The Company sought this information from the Depositories/Registrar and Share Transfer Agent (RTA); however, the gender-wise details of shareholder data are not maintained in their records. A letter confirmation regarding the non-availability of such data has been obtained from the RTA and is attached as Annexure A.

Accordingly, in the absence of gender-wise details, the Company has disclosed all its 486 shareholders under the category "Other than individual".

#### 2. REGARDING SHARE TRANSFER DETAILS:

In Form MGT-7, the company is required to disclose details of all share transfers effected during the year under the field: "<u>Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company)"</u>.

Since the RTA does **not maintain** records of share transfers executed after the dematerialisation of shares and a confirmation letter regarding the non-availability of such data has been obtained and attached as **Annexure A**. Accordingly, only the details of share transfers pertaining to the period prior to the dematerialisation of shares have been reported in this Form.



### 3. REGARDING ATTACHMENT OF FORM MGT-8:

We wish to bring to your kind attention that our company meets the criteria for mandatory certification of its Annual Return by a Company Secretary in Practice, in Form MGT-8 under Section 92(2) of the Companies Act, 2013, read with Rule 11(2) of the Companies (Management and Administration) Rules, 2014.

We understand that with the deployment of the MCA V3 portal, the certification under Form MGT-8 has been integrated into the MGT-7 web form and the contents of the said certification are system-generated and non-editable. As per the advisory issued by the Institute of Company Secretaries of India (ICSI) dated July 18, 2025, and in line with FAQ No. 37 from the MCA, companies were advised to continue providing the MGT-8 Certificate on their letterhead and attach it as an Optional Attachment to Form MGT-7, especially to include any qualifying remarks/comment or to ensure due diligence.

In our filing of this E-Form MGT-7, we followed this advisory and attached *a separate* copy of the MGT-8 certification, duly signed and with the required Unique Document Identification Number (UDIN), under the "Optional Attachment" section. This was done to ensure a comprehensive disclosure and for good governance practices.

This attachment is a Primary Document irrespective of the system-generated MGT-8 available in the Form MGT-7.

We request you to kindly take this clarification into your records and treat the said filing as complete and correct.

For, Sambhy Steel Tubes Limited

Niraj Shrivastava

Monardove

Company Secretary and Compliance Officer

M. No.: F8459

Manufacturing Units:

Sarora, Tilda, Raipur (C.G.)

### **ANNEXURE - A**



https://www.kfintech.com +91 40 6716 2222, 7961 1000

November 18, 2025

Sambhy Steel Tubes Limited Office No. 501 to 511, Harshit Corporate, Amanaka, Raipur (C.G) 492001

Kind Attn.: Shri Niraj Shrivastava

Dear Sir,

Sub.: Confirmation regarding non-availability of certain data required to file e-Form MGT-7 as on 31/03/2025

With reference to the captioned subject, we hereby confirm that the following details required for filing e-Form MGT-7 are not available in our system records:

- 1. Gender-wise classification of shareholders (Details are not available in NSDL benpos data as on 31/03/2025)
- 2. Details of transfer of shares during the FY 2024-25. (Transfer request not received during the FY 2024-25)

This confirmation is being issued at your specific request and is based on the data available in our system as the Share Transfer Agent.

Thanking you,

For KFIN Technologies Limited

Gopala Krishna KVS

Assistant Vice President - Operations Centre

KFin Technologies Limited

(Formerly known as KPIn Technologies Private Limited)

Registered & Corporate Office:

Selenium Building, Tower-B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally, Hyderabad, Rangareddi, Telangana, India, 500032.

CIN: L72400TG2017PLC117649



### List of Shareholders as on March 31, 2025

5r. No.	Type of shareholder/ debenture holder	Category of shareholder	Name of shareholder/ debenture holder	Number of security hel
1	Individual	Other than promoter	ASHISH KUMAR MAHIPAL	17500
2	Individual	Other than promoter	AMUL RAJENDRA CHAMARIA	150000
3	Individual	Other than promoter	GYAN MANCHANDA	50000
4	Individual	Other than promoter	HITESH KUMAR ARVINDBHAI SHAH	27000
5	Individual	Other than promoter	SHASHI SHARMA	200000
6	Individual	Other than promoter	RAKESH MITTAL	25000
7	Individual	Other than promoter	SUNNY MAHIPAL RADHESHYAM	15000
8	Individual	Other than promoter	SIDDHANT NAUTIYAL	330000
9	Individual	Other than promoter	LALIT VIKRAM	65000
10	Individual	Other than promoter	RAJINDER PARKASH AGGARWAL	65000
11	Individual	Other than promoter	SEEMA AGGARWAL	65000
12	Individual	Other than promoter	MOHIT GOYAL	65000
13	Individual	Other than promoter	RADHARANI SHARMA	6500
14	Individual	Other than promoter	ISHMOHIT ARORA	340000
15	Individual	Other than promoter	NEETU GUPTA	260000
16	Individual	Other than promoter	SHALINI JAIN	360000
17	Individual	Other than promoter	V V N D SURESH KUMAR V	300000
18	Individual	Other than promoter	Vineet Somnath Kaul	133000
19	Individual	Other than promoter	GOPAL DAS DAMANI	1000
20	Individual	Other than promoter	PRAVEEN BRULAL GUPTA	1000
21	Individual	Other than promoter	AMIT KUMAR SINGH	1200
22	Individual	Other than promoter	ARIF MALIK	500
23	Individual	Other than promoter	SACHIN SUBHASH ARORA	100000
24	Individual	Other than promoter	NIHAR NILESH SURU	250
25	Individual	Other than promoter	SONIA GAUTAM PRAJAPATI	21300
26	Individual	Other than promoter	GAURI AMIT GHODKE	1000
27	Individual	Other than promoter	DHARMENDRAKUMAR BHAGUBHAI PATEL	5000
28	Individual	Other than promoter	ARPIT DUBEY	1000
29	Individual	Other than promoter	DEEPAK PANDEY	3000
30	Individual	Other than promoter	BHUMIKA MAHESHWARI	13300
31	Individual	Other than promoter	RATNESH KUMAR MISHRA	500
32	Individual	Other than promoter	MOKSHIT CHETAN DEDHIA	2000
33	Individual	Other than promoter	UJIWAL PATNI	30000
34	Individual	Other than promoter	VENKATASAMY GOPAL	250000
35	Individual	Other than promoter	YUGAL KISHOR RATHI	6000
36	Individual	Other than promoter	MANISH RAMNIKLAL PATEL	250000
37	Individual	Other than promoter	AMITESH AGRAWAL HUF	75000
38	Individual	Other than promoter	EKANSHI MANGLA	10000
39	Individual	Other than promoter	ABHINANDAN AGRAWAL	60000
40	Individual	Other than promoter	PRASHANT GUPTA	7000
41	Individual	Other than promoter	NARESH LALJI VORA	1125
42	Individual	Other than promoter	RAGHVENDRA KUMAR	500
43	Individual	Other than promoter	MANISH KUMAR AGARWAL	52000
44	Individual	Other than promoter	DAIVEE MEHUL ACHARYA	125
45	Individual	Other than promoter	GEETIKA VINOD NIGOTIA	32000

For, SAMBHY STEEL TUBES LIMITED

SAMBHY STEEL TUBES LIMITED

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

CIN: U27320CT2017PLC007918

www.sambhv.com | info@sambhv.com

Registered Office:

501-511, 5th Floor, Harshit Corporate, Amanaka, Raipur (Chhattisgarh) - 492001 India

Tel: +91-771-2222360 | +91-7024116780, 1800 208 9990 Company Secretary
Manufacturing Units:

Satora, Tilda, Raipur (C.G.) Pin: 493114 Tel: +91-771-2222358



46	Individual	Other than promoter	GEETIKA VINOD NIGOTIA	93/
47	Individual Individual	Other than promoter	DARSHAN BHARAT GADA	320
48		Other than promoter	SWATI JAIN	50
49	Individual	Other than promoter	SAMARTH PUNDIR	20
50	Individual	Other than promoter	ALEKHYA RAKHECHA	75
51	Individual	Other than promoter	VAISHNAVI SABOO	10
52	Individual	Other than promoter	AISHWARYA DAGA	1956
53	Individual	Other than promoter	KARAN BANSAL	400
54	Individual	Other than promoter	SHWETA AGRAWAL	1000
55	Individual	Other than promoter	SUHAS CHANDREGOWDA	
56	Individual	Other than promoter	PARMODH BANSAL	670
57	Individual	Other than promoter	DHEERAJ KUMAR SINHA	210
58	Individual	Other than promoter	LAXMAN YADAV	661
59	Individual	Other than promoter	SHRADHA MANGLAM	500
60	Individual	Other than promoter	DARSHAN DEEPAKBHAI PALA	300
-	Individual	Other than promoter	PARASMAL DUNGARWAL	1500
61	Individual	Other than promoter	PAARTH SANDEEP PANDEY	500
62	Individual	Other than promoter	RAHUL AGRAWAL	100
63	Individual	Other than promoter	AKSHAT AGRAWAL	5000
64	Individual	Other than promoter	PARAS RASIKLAL GADA	213
65	Individual	Other than promoter	YASH GAUTAM GOSALIA	6500
66	Individual	Other than promoter	HARSHIKA CHANDRAPRAKASH TANI	106
67	Individual	Other than promoter	ARCHIT BHARGAVA	3700
68	Individual	Other than promoter	CHETAN MAKADIA	1250
69	Individual	Other than promoter	AKANSHA JAIN	300
70	Individual	Other than promoter	POOJA RAMCHARAN AGRAWAL	5000
71	Individual	Other than promoter		10000
72	Individual	Other than promoter	ADITYA SINGHAL	200
73	Individual	Other than promoter	RICHA JAIN	1000
74	Individual	Other than promoter	RATNI DEVI PUGALIA	400
75	Individual	Other than promoter	HARSH BOKADIA	10000
76	Individual	Other than promoter	PARMESHWARI DEVI BAHETI	3000
77	Individual	Other than promoter	HANSABEN JAGDISH SEJPAL	10000
78	Individual	Other than promoter	LAXMI.	10000
79	Entity	Other than promoter	DHARA MONIC SHAH	48000
30	Individual	Other than promoter	CAPRIZE INVESTMENT MANAGERS PRIVATE LIMITED	276000
31	Individual	Other than promoter	GURJEEV SINGH ANAND	130000
12	Individual	Other than promoter	PRITI CHETANBHAI KOTHARI .	65330
3	Individual	Other than promoter	SAURABH LOHIA	5000
4	Individual	Other than promoter	ASHA SURESH GUJARATI	280000
5	Individual	Other than promoter	MEDHAVI SACHAN	2500
6	Individual	Other than promoter	SANDEEP KUMAR MISHRA	1250
7	Individual	Other than promoter	SUMIT PANDEY	1000
3	Individual	Other than promoter  Other than promoter	PRADEEP KUMAR AGRAWAL	50000
9	Individual	Other than promoter Other than promoter	KISHAN KUMAR AGARWAL	5750
)	Individual		DOLLY AGARWAL	5750
	Individual	Other than promoter	SHASHIDEVI SRIPRAKASH LADHA	18600
	Individual	Other than promoter	MAAHESH GUPTA	50000
	Individual	Other than promoter	AMIT GOYAL	130000
	Individual	Other than promoter	ALPESH RAGHAVJI SAVLA	200
	Individual	Other than promoter	BHATTED GODAVARI DEVI	52290
		Other than promoter	AANCHAL MAHENDRA KAVEDIA .	250
	Individual	Other than promoter	JAYANT JAIN .	
	Individual	Other than promoter	AMIT JAIN.	10000 450000

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

CIN: U27320CT2017PLC007918 www.sambhv.com l info@sambhv.com 501-511, 5th Floor, Harshit Corporate, Amanaka, Raipur (Chhattisgarh) - 492001 India

Tel: +91-771-2222360 I +91-7024116780, 1800 208 9990

Manufacturing Units:

Compa Sarote Clada, Respur (C.G.) Pin: 493114 Tel: +91-771-2222358



98	Individual	Other than promoter	POOJA JAIN.	50000
99	Individual	Other than promoter	ALOK JAIN HUF.	2000
100	Individual	Other than promoter	SANTOSH KUMAR BHATTAD	12710
101	Individual	Other than promoter	AJAY SINGHAL HUF .	119000
102	Individual	Other than promoter	SHILPA DOSHI	200
103	Individual	Other than promoter	TANISHQ SINGHAL	106000
104	Individual	Other than promoter	SUNIL KUMAR GEHANI	5000
105	Individual	Other than promoter	SHASHANK VAID	10000
106	Individual	Other than promoter	DAMAYANTI HASMUKH GADA	1000
	Individual	Other than promoter	MANISHA JALAN	1000
108	Individual	Other than promoter	KAVITA GUPTA .	400
109	Individual	Other than promoter	DINESH GUPTA .	200000
110	Individual	Other than promoter	SALIAN GUPTA	65000
111	Individual	Other than promoter	RAJIVKUMAR AGARWAL	54000
112	Individual	Other than promoter	NIKHIL AGARWAL	54000
113	Individual	Other than promoter	SANJAY D PASORIA	20000
114	Individual	Other than promoter	DINESHKUMAR MURLIDHAR PASORIA	60000
115	Individual	Other than promoter	NIRAJ SHARMA HUF .	20000
116	Individual	Other than promoter	ANITA YADAV	3000
117	Individual	Other than promoter	JITENDRA AGARWAL (HUF)	4300
118	Individual	Other than promoter	RAKESH MITTAL	225000
119	Individual	Other than promoter	RAJ KUMAR HUF .	20000
120	Entity	Other than promoter	NARAYANI PIPES & TUBES PRIVATE LIMITED	35000
121	Individual	Other than promoter	ARJUN PARESH DASANI	50000
122	Individual	Other than promoter	SANJAY ARORA	1000
123	Individual	Other than promoter	AJAY KAPUR	200000
124	Individual	Other than promoter	RAMESH KUMAR	13000
125	Individual	Other than promoter	VIMAL PANKAJ SHETH	130000
126	Individual	Other than promoter	NISHIL NALINKANT SHETH	130000
127	Individual	Other than promoter	DIPTI HARESH MARU	3000
128	Individual	Other than promoter	SUMITRADEVI DINESHCHAND JAIN	20000
129	Individual	Other than promoter	CHAMPALAL NAVEEN KUMAR	125000
130	Individual	Other than promoter	I PRAMOD	125000
131	Individual	Other than promoter	KARAN MANOJ MAHESHWARI	191670
132	Individual	Other than promoter	REENABEN AMITKUMAR PATEL	5000
133	Individual	Other than promoter	MANUJA GAUTAM SHROFF	266670
134	Individual	Other than promoter	HARSH KIRAN NISAR	15000
135	Individual	Other than promoter	KARAN MADHUSUDAN SANWAL	4000
136	Individual	Other than promoter	VIRENDRA JAYANTILAL VAKHARIA	250
137	Individual	Other than promoter	SUJAY KALPESHBHAI PATEL.	65000
138	Individual	Other than promoter	NIKUNJKUMAR BHAGUBHAI PATEL.	3500
139	Individual	Other than promoter	BRUAL NIKUNJ PATEL .	3500
140	Individual	Other than promoter	MEENABEN MUKUNDBHAI PATEL.	7500
141	Individual	Other than promoter	KALPESHKUMAR AMRUTLAL PATEL .	65000
142	Individual	Other than promoter	TRUPTIBEN KALPESHKUMAR PATEL	65000
143	Individual	Other than promoter	JASH VIJAY CHORARIA .	135000
144	Individual	Other than promoter	SUNIL MITTAL	232557
145	Individual	Other than promoter	RANJANBEN TALAKSHI VORA	106700
46	Individual	Other than promoter	ANSHU AGGARWAL	10000
47	Individual	Other than promoter	KHUSHALI SUJAY PATEL .	65000
48	Individual	Other than promoter	DILIP TALAKSHI VORA	1077777
49	Individual	Other than promoter	RITESH JAGSHI SATRA .	173890
50	Individual	Other than promoter	NIKET NILESH SHAH	150

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

CIN: U27320CT2017PLC007918 www.sambhy.com l info@sambhy.com Registered Office:

For, SAMBHY STEEL TUBES LIMITED 501-511, 5th Floor, Harshit Corporate, Amanaka, Raipur (Chhattisgarh) - 492001 India Tel: +91-771-22223601+91-7024116780, 1800 208 9990

Sarore, Tilda, ReipfürdCr@187V Pin: 493114 Tel: +91-771-2222358



151	Individual	Other than promoter	RUPESH SONI .	200
152	Individual	Other than promoter	JAYANTILAL ABHEY CHAND HUF	100
153	Individual	Other than promoter	RAGHAVENDRA VARMA ALLURI	100
154	Individual	Other than promoter	HITESHBHAI AMRUTLAL PATEL	500
155	Individual	Other than promoter	MODANI DAYANAND ASARAM HUF.	250
156	Individual	Other than promoter	PIYUSH AJAY SARAWAGI	251
157	Individual	Other than promoter	SHEETAL SUNIL SHINDE	
158	Individual	Other than promoter	GANDHI DENISH CHANDRAKANT	150
159	Individual	Other than promoter	DINESH GUPTA	_
160	Individual	Other than promoter	SHYAM VASUDEV AGRE	4000
161	Individual	Other than promoter	PATEL GAURANG	500
162	Individual	Other than promoter	CHETNABEN DEVENDRAKUMAR PATEL	330
163	Individual	Other than promoter	VUAYKUMAR KHYALIRAMJI MAHIPAL	2500
164	individual	Other than promoter	DHANPAT JAIN	1046
165	Individual	Other than promoter	AMIT P VERMA	1100
166	Individual	Other than promoter	ALPESH LAXMICHAND SHAH	1644
167	Individual	Other than promoter		5000
168	Individual	Other than promoter	FORAM SHAH	5000
169	Individual	Other than promoter	YOGESH KUMAR SANGHI HUF .	1200
170	Individual	Other than promoter	SHWETA JIMIT SHAH	350
171	Individual	Other than promoter	PANKAJ SHARMA	1000
172	Individual	Other than promoter	CHANDRAPRABHA HINGER	2518
173	Individual	Other than promoter	REKHA SHARMA	4000
174	Individual	Other than promoter	PRAVIN BALKISHAN KHANNA	13000
175	Individual	Other than promoter  Other than promoter	PAYAL TAWANIYA	5000
176	Individual	Other than promoter Other than promoter	MINESH RAMAKANT TENDULKAR	8000
177	Individual		PATEL LILABEN RAMESHBHAI	25000
178	Individual	Other than promoter	SANJANA PRAVIN KHANNA	13000
179	Individual	Other than promoter	SUMEET AGRAWAL	25000
180	Individual	Other than promoter	MANISHA ASHVIN TANK	1000
181	Individual	Other than promoter	RAJESH AGARWAL	25000
182	Individual	Other than promoter	ARUN KUMAR GUPTA	10000
183		Other than promoter	SUKHMAN SINGH HUF	7000
184	Individual	Other than promoter	NITISH KUMAR SUHASARIA	20000
185	Individual	Other than promoter	SAPNA AGRAWAL	25000
186	Entity	Other than promoter	MI LIFESTYLE MARKETING GLOBAL PRIVATE LIMITED	25000
-	Individual	Other than promoter	SUNIL KUMAR .	1000
187	Individual	Other than promoter	ABHINAV GUPTA	26660
188	Individual	Other than promoter	ASHISH JAIN HUF	135000
89	Individual	Other than promoter	ANKIT MITTAL	362996
190	Individual	Other than promoter	MAHESH KUMAR BANSAL	
91	Individual	Other than promoter	SANJAY GARG	20000
92	Individual	Other than promoter	SACHIN KAPDOR HUF	100000
93	Individual	Other than promoter	PARVEEN MITTAL HUF	93000
94	Individual	Other than promoter	ANJALI MITTAL	20000
95	Individual	Other than promoter	ANUJ MITTAL	70000
96	Individual	Other than promoter	AARTI.	15000
97	Individual	Other than promoter		10000
98	Individual	Other than promoter	RIYA .	15000
99	Individual	Other than promoter	PROMILLA MITTAL	10000
00	Individual	Other than promoter	SONU KUMAR	10000
01	Individual	Other than promoter	PARAS MITTAL	10000
02	Individual	Other than promoter	NEERAJ JAIN	2000
13	Individual	Other than promoter  Other than promoter	BHUVAN MITTAL	68837
	770	order trian promoter	VIPIN MITTAL	5000

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

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Tel: +91-771-2222360 | +91-7024116780, 1800 208 9990

For, SAMBHY STEEL TUBES LIMITED

ConSavera, Rida, Raipur (C.G.) Pin: 493114 Tet: 191-771-2222358

Manufacturing Units:



204	Entity	Other than promoter	SHARE INDIA SECURITIES LIMITED . INV	43340
	Individual	Other than promoter	8AL KISHAN	10000
206	Individual	Other than promoter	AAKRITI MALPANI	11000
207	Individual	Other than promoter	VIKAS NARESH KUMAR GARG	23000
208	Individual	Other than promoter	KRISHAN BANSAL	35000
209	Individual	Other than promoter	NEHA GUPTA	9984250
210	Individual	Other than promoter	TEJAS DINESHBHAI JARIWALA	13500
211	Individual	Other than promoter	RAVI SARAF (HUF)	180000
212	Individual	Other than promoter	AMIT SARAF (HUF)	20000
213	Individual	Other than promoter	USHABEN D JARIWALA	13500
214	Individual	Other than promoter	GARIMA RITESH CHAWLA	13300
215	Individual	Other than promoter	ANITHA BHATTED BHATTED	410
216	Individual	Other than promoter	ASHOK KUMAR LAXMI NARAYAN KOTHARI	65000
217	Entity	Other than promoter	NIVESHAAY HEDGEHOGS LLP	1087205
218	Individual	Other than promoter	ADITYA KAUL	130000
219	Individual	Other than promoter	RADHIKA AGARWAL	3180
220	Individual	Other than promoter	HEMANT KABRA (HUF)	-
221	Individual	Other than promoter	KAVYABEN VIRAJ VELANI	20000
222	Individual	Other than promoter	HARIKRUSHNBHAI NARSIHBHAI SONANI (HUF)	26700
223	Individual	Other than promoter	BHAVIKKUMAR BAVCHANDBHAI SAVALIYA (HUF)	5870
224	Individual	Other than promoter	AMIT VASHRAMBHAI PATEL (HUF)	5880
225	Individual	Other than promoter	TARUN KUMAR KOTHARI	11750
226	Entity	Other than promoter	UNITYCAPITAL ADVISORS LLP	65000
227	Individual	Other than promoter	GANESH NAMDEV SONAWANE (HUF)	50000
228	Individual	Other than promoter	ADITI BHATTED	2340
229	Individual	Other than promoter	TOTAL CONTRACTOR OF THE PARTY O	6999
230	Individual	Other than promoter	RAKESH LAROIA DEEPAK YUVRAJ PATIL	1080000
231	Individual	Other than promoter		5000
232	Individual	Other than promoter	AKANKSHA SHUKLA SHREYANSH KUMAR BAID	230100
233	Individual	Other than promoter		11850
234	Individual	Other than promoter	SANJAY KUMAR GOYAL	150000
235	Individual	Other than promoter	UDIT SEHGAL	67000
236	Individual	Other than promoter	RUBIA BEGUM	4200
237	Individual	Other than promoter	RAMESH KUMAR GUPTA	130000
238	Individual	Other than promoter	ASHWANI SINGLA HUF	25000
239	Entity	Other than promoter	RISHI KUMAR DEWANGAN	1000
240	Individual	Other than promoter	GT MANAGEMENT SERVICES LLP	10000
241	Individual	Other than promoter	PUJA AGARWAL	50000
242	Individual	Other than promoter	PRATIBHA SINGH FAUZDAR	200000
243	Individual	Other than promoter	ASHOK KUMAR MITTAL .	70000
244	Individual		KAMAL KUMAR AGARWAL	20000
45	Individual	Other than promoter	NAVIN GOYAL	20000
46	Individual	Other than promoter	SHASHI KANT SHARDA	10000
47	Individual	Other than promoter	SARALA ,	2000
48	Individual	Other than promoter	SANGEETHA .	2500
49		Other than promoter	VEERESH KUMAR	2500
50	Individual	Other than promoter	BHAVNABEN NAVINCHANDRA PATEL	7000
	Individual	Other than promoter	NAVINCHANDRA KESHAVLAL PATEL	6000
51	Individual	Other than promoter	DHARINI NAVINCHANDRA PATEL	7000
52	Individual	Other than promoter	ARCHANA HEMANT BAJAJ	13300
53	Individual	Other than promoter	AKSHAY KHANDELWAL	20000
54	Individual	Other than promoter	KETAN ARVIND SHAH	500
55	Individual	Other than promoter	PANKAJ BHANDARI	500
56	Individual	Other than promoter	CHETAN BHATTED	1001

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

CIN: U27320CT2017PLC007918 www.sambhv.com l info@sambhv.com

### Registered Office:

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Tel: +91-771-2222360 l +91-7024116780, 1800 208 9990

For, SAMBHY STEEL TUBES LIMITED

Manufacturing Units:

Compassor (C.G.) Pin: 493114 Tel: +91-771-2222358



257	Individual	Other than promoter	GARIMA RISHABH DAKALIA	1330
258	Individual	Other than promoter	PRATIK M CHANDAK	1330
259	Individual	Other than promoter	CHAMPA ASHKARAN SETHIA	1330
260	Individual	Other than promoter	JITENDRA KUMAR BOTHRA	1330
261	Individual	Other than promoter	SURESH KUMAR NAWANDAR (HUF)	2480
262	Individual	Other than promoter	JAY AJIT CHHAIRA	6500
263	Individual	Other than promoter	ASHISH MULCHANDBHAI AMIN	47000
264	Entity	Other than promoter	PREMIER LOOMS MANUFACTURE RS PVT LTD	33000
265	Individual	Other than promoter	SRI SURYANARAYANA RAJU VEGESNA .	1000
266	Individual	Other than promoter	RAKESH KANTILAL RATHOD	27000
267	Individual	Other than promoter	AMOGH KEDIA	2100
268	Individual	Other than promoter	UMESH CHANDRA PALIWAL	24000
269	Individual	Other than promoter	MEGHA MANOJ KUMAR SETHIA	11000
270	Individual	Other than promoter	ARJUN PARESH DASANI	2500
271	Individual	Other than promoter	VIKRAM SONPRAKASH SHARMA	43000
272	Individual	Other than promoter	HARISH SURESH GUPTA	500
273	Individual	Other than promoter	SHEKHAR DOKANIA	25000
274	Individual	Other than promoter	AJAYKUMAR SURYA	2670
275	Individual	Other than promoter	SMIT VIRENDRA VAKHARIA	750
276	Individual	Other than promoter	YASH KANTILAL HARIA	
277	Individual	Other than promoter	ARTH AGRAWAL	525
278	Individual	Other than promoter	CHAITAN AGRAWAL	2500
279	Individual	Other than promoter	CHANDRESH RAMESHKUMAR MALPANI	1000
280	Individual	Other than promoter	GARVIT ARVINDKUMAR CHOUDHARY	2670
281	Individual	Other than promoter	KESHAV KABRA	5300
282	Individual	Other than promoter	RAJNISH SINGH	2250
283	Individual	Other than promoter	APOORVA BHARGAVA	1000
284	Individual	Other than promoter	VENKATA GURAVAIAH KARNA	1000
285	Individual	Other than promoter	SHIVAM JOHRI	67000
286	Individual	Other than promoter	RISHAB MITTAL	5000
287	Individual	Other than promoter	RUPESH JAIN KOTHARI	500
288	Individual	Other than promoter	UTSAV PATODIA	1000
289	Individual	Other than promoter	SHIFA MOHAMMED HAMIDANI	795
290	Individual	Other than promoter	CHARU VIRENDRA VAKHARIA	50000
291	Individual	Other than promoter	VANDIT VIRENDRA VAKHARIA	250
292	Individual	Other than promoter		250
293	Individual	Other than promoter	RISHAB DAGA KRISHNA RAJEEV AGARWAL	1000
294	Individual	Other than promoter		15670
295	Individual	Other than promoter	ROJA KALIDINDI SIDHARTH GARG	10000
296	Individual	Other than promoter	TOTAL PROPERTY OF THE PROPERTY	10000
297	Individual	Other than promoter	PRIYANK KIRAN SAVLA	500
298	Individual	Other than promoter	ROSHNI LAHOTY	16000
299	Individual	Other than promoter	PANKTI HARISH CHHEDA	1250
300	Individual	Other than promoter	VINEET SHARMA	50000
301	Individual	Other than promoter	NINAD NARESHKUMAR PATEL	5000
102	Individual	Other than promoter	SANYAM JAIN	3000
103	Individual	Other than promoter	NIAL NAMAN	4000
104	Individual	Other than promoter	SANJAY LUNIYA	1000
05	Individual	Other than promoter	SUMAN CHOUDHARY	5000
06	Individual	Other than promoter  Other than promoter	DHAIRYA DHARMESH VADOR	100
07	Individual	Other than promoter  Other than promoter	KARTIK KAPOOR	1000
08	Individual	Other than promoter Other than promoter	DINESH KHANDELWAL	21017
09	Individual		KISHORE KUMAR PUKHRAJ (HUF)	10000
-	TOTAL CORP.	Other than promoter	GOURAV ROY	67000

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For, SAMBHY STEEL TUBES LIMITED

Manufacturing Units: Company Secretary Sarsia, Tida, Raipur (C.G.) Pin: 493114 Tel: +91-771-2222358



310	Individual	Other than promoter	DEEPAK GOHIL	1000
311	Individual	Other than promoter	SWETA ANANTHANARAYANAN	5000
312	Individual	Other than promoter	BRU KISHOR AGRAWAL	1500
313	Individual	Other than promoter	PALAK JAIN	1190
314	Individual	Other than promoter	ALOK KUMAR SHUKLA	500
315	Individual	Other than promoter	ROHIT MITTAL	5782
316	Individual	Other than promoter	SHRADHA BIYANI	2500
317	Individual	Other than promoter	NIRMAL KUMAR AGRAWAL HUF	10000
318	Individual	Other than promoter	PANKAJ MAHIPAL	17500
319	Individual	Other than promoter	URVASHI CHAYAN SARDA	12000
320	Individual	Other than promoter	CHAYAN LAXMINARAYAN SARDA	13000
321	Individual	Other than promoter	PIYUSH KIRTI PUROHIT	100
322	Individual	Other than promoter	ASHISH NAHAR	5000
323	Individual	Other than promoter	SURESH SOLANKI	2000
324	Individual	Other than promoter	MARWAL PUSHPA JAISINGH	10000
325	Individual	Other than promoter	VINAY JAIPRAKASH AMBEKAR	25000
326	Individual	Other than promoter	SMIT VIRENDRA VAKHARIA	750
327	Individual	Other than promoter	PRIYANKA AGRAWAL	25000
328	Entity	Other than promoter	TRADELINK EXIM INDIA PRIVATE LIMITED	97200
329	Individual	Other than promoter	GITABEN BHUPEDRABHAI LODARIYA	15000
330	Individual	Other than promoter	ANSH JAYESH NISAR	15000
331	Individual	Other than promoter	KALAVATI BAHETI	20000
332	Entity	Other than promoter	SHREE JINKUSHALSURI SECURITIES AND CONSULTANTS LLP	15000
333	Individual	Other than promoter	JAYANT JAIN	30000
334	Individual	Other than promoter	BISHNU KUMAR AGARWAL & SONS	2500
335	Entity	Other than promoter	NAVEEN AGARWAL HUF	2500
336	Entity	Other than promoter	WATERMAN INDUSTRIES PRIVATE LIMITED	20000
337	Individual	Other than promoter	AATISH SHARMA	10000
338	Entity	Other than promoter	AOA CONSULTANTS PRIVATE LIMITED	20000
339	Individual	Other than promoter	VIRENDRA JAYANTILAL VAKHARIA (HUF)	250
340	Individual	Other than promoter	KUMAR NAVEEN	12000
341	Individual	Other than promoter	LALITA RAMESHCHANDRA ASAWA	1335
342	Individual	Other than promoter	SONIA SURANA	1000
343	Individual	Other than promoter	AAYUSH TIWARI	5000
344	Individual	Other than promoter	TANAY SUDHIR BHEDA	488890
345	Individual	Other than promoter	SHIVANCHAL GUPTA	25000
346	Individual	Other than promoter	ANGEL GUPTA	20000
347	Individual	Other than promoter	AJAY GUPTA	50000
348	Individual	Other than promoter	NITIKA GUPTA	25000
349	Individual	Other than promoter	SAHIL JAIN	150000
350	Individual	Other than promoter	ANKITA GOEL	25000
351	Individual	Other than promoter	VIMAL AGRAWAL	50000
352	Entity	Other than promoter	KHUSHBOO NAYAN SHAH(EYE GLOBAL ASSOCIATES)	550
353	Individual	Other than promoter	JEEVANLATA	40000
354	Individual	Other than promoter	VANDITA JAIN	11000
355	Individual	Other than promoter	UTTAM CJAIN	25000
356	Individual	Other than promoter	NAMRATA TIBREWALA	10000
157	Individual	Other than promoter	MODI GIRISH CHANDULAL	4000
158	Individual	Other than promoter	INDRA KUMAR BAGRI	100
359	Individual	Other than promoter	USHA AGARWAL	216000
60	Individual	Other than promoter	NIKHAR PATEL	2500
61	Individual	Other than promoter	DHRUV RAJESH THAKKER	300
162	Individual	Other than promoter	For, SANASHAY AGARWAY BES LIMITED	300

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Tel: +91-771-2222360 ( +91-7024116780, 1800 208 9990

Company Secretary Units:

Opporates

Sarora, Tilda, Raipur (C.G.) Pin: 493114 Tel: +91-771-2222358



363	Individual	Other than promoter	VISHAL AGARWAL	69000
364	Entity	Other than promoter	CAMEL FOODS PVT LTD.	756000
365	Individual	Other than promoter	LALIT KUMAR AGARWAL	10000
366	Individual	Other than promoter	VATSAL AGRAWAL	10000
367	Individual	Other than promoter	ISHWAR WADHWA	8000
368	Individual	Other than promoter	AJAY GARG	10000
369	Individual	Other than promoter	AAKASH DEEP GOYAL	199000
370	Individual	Other than promoter	VARSHA HARESHCHANDRA SHAH	4000
371	Entity	Other than promoter	WEALTH WISDOM INDIA PRIVATE LIMITED	600
372	Entity	Other than promoter	UNLISTEDGURU LLP	250
373	Individual	Other than promoter	NALINI KHANDELWAL	50000
374	Individual	Other than promoter	NIRAJ KAJARIA	3000
375	Individual	Other than promoter	KARAN TAORI	50000
376	Individual	Other than promoter	KARUNA TRIPATHI	20000
377	Individual	Other than promoter	RISHABH BHATT	3100
378	Individual	Other than promoter	KUSHAN SHAH	50000
379	Individual	Promoter	SURESH KUMAR GOYAL	1853625
380	Individual	Promoter	ROHIT GOYAL	7440000
381	Individual	Promoter	MANOJ KUMAR GOYAL	1205010
382	Individual	Promoter	VIKAS KUMAR GOYAL	1853625
383	Individual	Promoter	HARSHEET GOYAL	7378000
384	Individual	Promoter	KAUSHLYA GOYAL	
385	Individual	Promoter	SHASHANK GOYAL	1908866 6962340
386	Individual	Other than promoter	SHEKHAR BHATT	
387	Individual	Other than promoter	RAVI GARG	20000
388	Individual	Other than promoter	ABHIMANYU SHARMA	50000
389	Individual	Other than promoter	ARUN BANSAL	65000
390	Individual	Other than promoter	RENU JAIN	42000
391	Individual	Other than promoter	HETAL ASHOK CHINIWALA	20000
392	Individual	Other than promoter	SOHEL ASPANDIAR SAROSHIAN	10000
393	Individual	Other than promoter	JYOTI FALODIA	3000
394	Individual	Other than promoter		3400
395	Individual	Other than promoter	RAVI KUMAR JAIN	10000
396	Individual	Other than promoter	PRAGYAN DAMANI	6500
397	Individual	Other than promoter	ARTI BUNG RAHUL SHARMA	10000
398	Individual	Other than promoter	The state of the s	65000
399	Individual	Other than promoter	AKASHJAIN	97000
400	Individual	Other than promoter	DHEER NITIN THAKKAR	50000
401	Individual	Other than promoter	MARGI NACHIKET PATEL	2100
402	Individual	Other than promoter	LAXMINARAYAN SARDA	26700
403	Individual	Other than promoter	TUSHAR AGGARWAL	25000
404	Individual		HANUMAN MURARKA	10000
405	Individual	Other than promoter Other than promoter	NORATHMAL JAIN HUF	15000
406	Individual	Other than promoter  Other than promoter	DEVRAI YOGESH THAKKAR	50000
407	Individual		RAKESH AGARWAL	22000
408	Individual	Other than promoter	GIRISH SHANBHAG	5000
409		Other than promoter	PRADEEP KUMAR JAIN	35000
410	Individual	Other than promoter	AASTHA JAIN	25000
111	Individual	Other than promoter	SUBASH KUMAR AGGARWAL	30000
	Individual	Other than promoter	PRANAY MUKESH SHAH	25000
112	Entity	Other than promoter	SHAMJI OPTIMA PRIVATE LIMITED	98330
113	Individual	Other than promoter	VIKAS KHANDELWAL	10000
14	Individual	Other than promoter	MANASI AMOL PATIL	1500
115	Individual	Other than promoter	ANUP AGRAWAL	50000

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Tel: +91-771-2222360 I +91-7024116780, 1800 208 9990

# For, SAMBHY STEEL TUBES LIMITED Manufacturing Units:

Sarora, Tilda, Raipur (C.G.) COMPRO 493144(Peb.+91-771-2222358



416	Individual			
417	Individual	Other than promoter	NARENDER G	1000
418	Individual	Other than promoter	KAVITHA	1000
419	Individual	Other than promoter	RAJESH C TILESARA	1000
420	Entity	Other than promoter	LUNIA ABHISHEK	1000
421	Individual	Other than promoter	INDUSCAP WEALTH PRIVATE LIMITED	18
422	Individual	Other than promoter	SANJAY KAYATHWAL	13000
423	Individual	Other than promoter	NITIN KUMAR PATEL	5000
424		Other than promoter	KOMAL BANSAL	10000
425	Entity	Other than promoter	SHRI PARASRAM HOLDINGS PVT LTD	100
426	Individual	Other than promoter	SANTOSH KUMAR SINHA	36000
427	Individual	Other than promoter	AWADHESH KUMAR PANDEY	13000
428	Individual	Other than promoter	HITESHKUMAR ARVINDBHAI SHAH	24300
429	Individual	Other than promoter	SURESH KUMAR JAIN	2000
430	Entity	Other than promoter	IZUZ CONSULTANCY PRIVATE LIMITED	5613
431	Entity	Other than promoter	BOHTI ENTERPRISES LLP	50
432	Individual	Other than promoter	ANIL SAMPATHRAI BOHRA	5000
199	Individual	Other than promoter	ABHISHEK SINGHVI	87700
433	Individual	Other than promoter	SUNIL JAIN	100000
434	Individual	Other than promoter	MANJU SINGHI	212300
435	Individual	Other than promoter	BINA SANJAY DOSHI	2131
436	Individual	Other than promoter	KSHITIZ JAIN	25000
437	Individual	Other than promoter	VIVEKJAIN	216000
438	Individual	Other than promoter	ANSHU AHUJA	40000
439	Individual	Other than promoter	KAPIL AHUJA	450000
440	Individual	Other than promoter	USHA KUSHWAHA	795
441	Individual	Other than promoter	PRIYANKA UDIT TIWARI	4500
442	Individual	Other than promoter	AKHIL KUMAR GARG	1000
443	Individual	Other than promoter	SHRIGOPAL AGRAWAL	49000
444	Individual	Other than promoter	KHUSBOO AGARWAL	100000
445	Individual	Other than promoter	KRISHNA MALIK	67000
446	Individual	Other than promoter	NAVEEN KUMAR	10000
447	Individual	Other than promoter	PULKIT SINGHAL	667
448	Entity	Other than promoter	STRATAGEM PORTFOLIO PRIVATE LIMITED	800
449	Individual	Other than promoter	SANJAY KUMAR BANSAL	10000
450	Individual	Other than promoter	RUPAL HARESH BHANUSHALI	
451	Individual	Other than promoter	PARAG ARVIND SHAH	100
452	Individual	Other than promoter	ATUL DINESH SETH	8000
453	Entity	Other than promoter	DHOLAI TEA COMPANY PVT LTD	10000
454	Entity	Other than promoter	NIVESHAAY HEDGEHOGS FUND	66670
455	Individual	Other than promoter	AASHIL APURVA SHAH	175000
456	Individual	Other than promoter	ANSH ASHIT SHAH	930000
457	Individual	Other than promoter	MR. ABISHEK PESALA	320000
458	Entity	Other than promoter	BALAJI BUILDING TECHNOLOGIES LIMITED	4000
459	Individual	Other than promoter	DEEKSHA DUNGARWAL	5500
460	Individual	Other than promoter	NUPUR TOSHNIWAL	500
461	Entity	Other than promoter	SHREERAM FINCARE INDIA PRIVATE LIMITED	3000
462	Entity	Promater	ASHISH KUMAR GOYAL HUF	27000
163	Entity	Promoter		10000
164	Entity	Promoter	SURESH KUMAR GOYAL AND SONS HUF	10000
165	Individual	Promoter	VIKAS GOYAL AND SONS HUF	10000
66	Individual	Promoter	SUMAN GOYAL	19113660
67	Entity	Promoter	MANOJ KUMAR GOYAL	10100
68	Entity	Promoter	BRULAL GOYAL AND SONS (HUF)	10000
		Tromoter	GOYAL REALTY & AGRICULTURE PRIVATE LIMITED	7600000

(Formerly Known as Sambhy Sponge Power Private Limited & Sambhy Steel Tubes Private Limited)

CIN : U27320CT2017PLC007918 www.sambhv.com l info@sambhv.com

### Registered Office:

501-511, 5th Floor, Harshit Corporate, Amaraka, Raipur (Chhattisgarh) - 492001 India Tel: +91-771-2222360 I +91-7024116780, 1800 208 9990

For, SAMBHY STEEL TUBES LIMITED

Manufacturing Units:

Sprora, Dieta, Raigur (C.G.)
Pin 1997 M New 201 9941/2222358

Sarora , Dista , Raspur (C.G.) Pri: 493114 Not 20107313222358 Kuthrel, Tilda, Raipur (C.G.) Pin: 493116 Tel: +91-771-2222359



469	Individual	Promoter	PAL ACRAMAL	
470	Individual	Promoter	RAJ AGRAWAL	220000
471	Individual	Other than promoter	AYUSH AGRAWAL	220000
472	Individual		AYUSH PAWAN BANSAL	175000
473	Individual	Other than promoter	SUNNY RADHESHYAM MAHIPAL	135000
474	Individual	Other than promoter	ASHISH KUMAR MAHIPAL	157500
475		Promoter	SHEETAL GOYAL	19088660
476	Individual	Promoter	ASHISH GOYAL	18535850
-	Individual	Other than promoter	ANU GARG	80000
477	Individual	Other than promoter	ARCHANA GOYAL	
478	Individual	Other than promoter	RINKU GOYAL	19088660
479	Individual	Other than promoter	MAYANK AGRAWAL	4545460
480	Individual	Promoter	BRULAL GOYAL	54000
481	Individual	Other than promoter	The state of the s	18536250
482	Individual	Other than promoter	BHAVESH KHETAN	4666660
483	Individual	Other than promoter	PANKAJ GOYAL	86100
484	Individual		AKSHAY DUGAR	10000
485	Individual	Other than promoter	MANJU GARG	20000
486	Individual	Other than promoter	RADHARANI SHARMA	58500
100	muividuai	Other than promoter	SAROJ SHARMA .	6300

Company Secretary