

Custodian for GDRs & ADRs									
Grand Total (A+B+C)	1666990	556924	2223914	100	1666990	556924	2223914	100	0

ii) Shareholding of Promoters:

Shareholders Name	Shareholding at the beginning of the year (April 1, 2019)			Shareholding at the end of the year (March 31, 2020)			% 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	
ABHILASH GROWTH FUND PVT LTD	73850	3.32	0	73850	3.32	0	0
J.L GROWTH FUND LTD	91130	4.10	0	91130	4.10	0	0
NAHAR GROWTH FUND P LTD	20000	0.90	0	20000	0.90	0	0
SUVRAT TRADING CO. LTD	160035	7.20	0	160035	7.20	0	0
NAGDEVI TRADING & INVESTMENT CO. LTD	830685	37.35	0	830685	37.35	0	0
VANAİK INVESTORS LTD	123360	5.55	0	123135	5.54	0	-0.01
SANKESHWAR HOLDING CO. LTD	176400	7.93	0	176400	7.93	0	0
ATAM VALLABH FINANCIERS LTD	15000	0.67	0	15000	0.67	0	0
VARDHMAN INVESTMENTS LTD	10000	0.45	0	10000	0.45	0	0
SH. JAWAHARLAL OSWAL	30000	1.35	0	0	0	0	-1.35
SH. KAMAL OSWAL	19600	0.88	0	79530	3.58	0	2.7
SH. DINESH OSWAL	29930	1.35	0	0	0	0	-1.35
OSWAL WOOLLEN MILLS LTD	87000	3.91	0	87000	3.91	0	0
TOAL	1666990	74.96	0	1666765	74.95	0	-0.01

iii) Change in Promoters' Shareholding (Please specify, if there is no change)*

Shareholding at the beginning of the year	Date wise increase/decrease in shareholding during the year					Cumulative Shareholding during the year	
	No. of Shares	% of total shares of the Company	Date	Increase/D decrease	Reason	No. of Shares	% of total shares of the Company
1. Vanaik Investors Limited				Decrease			
At the beginning of the year	123360	5.55	01.04.2019	-	-		
Changes during the year	-	-	22.11.2019	10	Sell	123350	5.55
			29.11.2019	30	Sell	123320	5.55
			06.12.2019	30	Sell	123290	5.54
			13.12.2019	30	Sell	123260	5.54
			20.12.2019	30	Sell	123230	5.54
			27.12.2019	30	Sell	123200	5.54
			31.12.2019	10	Sell	123190	5.54
			06.03.2020	35	Sell	123155	5.54
			13.03.2020	5	Sell	123150	5.54
			20.03.2020	15	Sell	123135	5.54
At the end of the year	123135	5.54	31.03.2020	-	-		
2. Sh. Jawahar Lal Oswal				Decrease			
At the beginning of the year	30000	1.35	01.04.2019	-	-		

Changes during the year	-	-	22.11.2019	30000	Gift given	0	0.00
At the end of the year	0	0.00	31.03.2020	-	-		
3. Sh. Dinesh Oswal				Decrease			
At the beginning of the year	29930	1.35	01.04.2019	-	-		
Changes during the year	-	-	22.11.2019	29930	Gift given	0	0.00
At the end of the year	0	0.00	31.03.2020	-	-		
4. Sh. Kamal Oswal				Increase			
At the beginning of the year	19600	0.88	01.04.2019	-	-		
Changes during the year	-	-	22.11.2019	59930	Gift received	79530	3.58
At the end of the year	79530	3.58	31.03.2020	-	-		

* Apart from the information provided, there was no change in the shareholding of any other promoter of the Company.

iv) Shareholding Pattern of Top Ten Shareholders (Other than Directors, Promoters and Holders of GDRs and ADRs)

Name	Shareholding at the beginning of the year		Date	Increase/ Decrease in shareholding	Reason	Cumulative Shareholding during the year	
	No. of shares	% of total shares of the Company				No. of Shares	% of total shares of the Company
HANUMAN JHUNJHUNWALA	71000	3.92	NA	NIL	NA	71000	3.92
FAYETTE TRADING & INVESTMENT CO. LTD	42600	1.92	NA	NIL	NA	42600	1.92
SUBASH MADAN	28400	1.28	NA	NIL	NA	28400	1.28
CROUSE INVESTMENT PVT LTD	24850	1.12	NA	NIL	NA	24850	1.12
JAGDISH MAL LODHA	14200	0.64	NA	NIL	NA	14200	0.64
CHAND RATAN BIYANI	14200	0.64	NA	NIL	NA	14200	0.64
KAMAL HOLDING CO. LTD	10650	0.48	NA	NIL	NA	10650	0.48
DALIP PRABHAKAR PATHAK	6390	0.29	NA	NIL	NA	6390	0.29
RAJENDRA RAO	710	0.03	NA	NIL	NA	710	0.03
BHAVNA N SHAH	710	0.03	NA	NIL	NA	710	0.03

Note:

v) Shareholding of Directors and Key Managerial Personnel

---- NIL----

Name	Shareholding at the beginning of the year		Date	Increase/ Decrease in share holding	Reason	Cumulative Shareholding during the year	
	No. of shares	% of total shares of the Company				No. of shares	% of total shares of the Company
-----NIL----		-----NIL-----		-----NIL-----		---- NIL ----	

Note:

Indebtedness of the Company including interest outstanding/accrued but not due for payment

---NIL---

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	NIL	NIL	NIL	NIL
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	NIL	NIL	NIL	NIL
Change in Indebtedness during the year				

Addition	NIL	NIL	NIL	NIL
Reduction	NIL	NIL	NIL	NIL
Net Change	NIL	NIL	NIL	NIL
Indebtedness at the end of the financial year				
i) Principal Amount	NIL	NIL	NIL	NIL
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	NIL	NIL	NIL	NIL

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

A. Remuneration to Managing Director, Whole Time Directors and/ or Manager

Particulars of Remuneration	Sh. Mohinder Kumar Jain* Manager	Total amount (in Rs.)
1. Gross Salary		
a) Salary as per provisions contained in Section 17 (1) of the Income Tax Act, 1961	10,20,000	10,20,000
b) Value of perquisites under Section 17 (2) of the Income Tax Act, 1961	-	-
c) Profits in lieu of salary under Section 17 (3) of the Income Tax Act, 1961	-	-
2. Stock Options	-	-
3. Sweat Equity	-	-
4. Commission		
- as % of profit	-	-
- others, specify	-	-
5. Others, please specify		
a) Retiral benefits	-	-
TOTAL (A)	10,20,000	10,20,000
Ceiling limit	5% of the Net Profits i.e. Nil (The Company has suffered loss during the year)	

*Sh. Mohinder Kumar Jain was appointed w.e.f. 04.04.2019 and had been paid the remuneration as approved by the Shareholders of the Company by way of Special Resolution passed in the 37th Annual General Meeting of the Company held on 28.09.2019.

B. Remuneration to Other Directors

1. Independent Directors

Particulars of Remuneration				Total amount (in Rs.)
- Fee for attending Board/ Committee Meetings	NIL	NIL	NIL	NIL
- Commission	NIL	NIL	NIL	NIL
- Others, please specify	NIL	NIL	NIL	NIL
TOTAL (B)(1)	NIL	NIL	NIL	NIL

2. Other Non-Executive Directors

Particulars of Remuneration				Total amount (in Rs.)
- Fee for attending Board/ Committee Meetings	NIL	NIL	NIL	NIL
- Commission	NIL	NIL	NIL	NIL
- Others, please specify	NIL	NIL	NIL	NIL
TOTAL (B)(2)	NIL	NIL	NIL	NIL
TOTAL (B)= (B)(1)+(B)(2)				NIL
Overall Ceiling as per the Act	11% of the Net Profits i.e. Nil			

(The Company has suffered loss during the year)

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

Particulars of Remuneration	Ms. Jyoti Sud* Company Secretary Cum Chief Financial Officer	Total amount (in Rs.)
1. Gross Salary		
d) Salary as per provisions contained in Section 17 (1) of the Income Tax Act, 1961	96,000	96,000
e) Value of perquisites under Section 17 (2) of the Income Tax Act, 1961	-	-
f) Profits in lieu of salary under Section 17 (3) of the Income Tax Act, 1961	-	-
2. Stock Options	-	-
3. Sweat Equity	-	-
4. Commission		
- as % of profit	-	-
- others, specify	-	-
5. Others, please specify		
a) Retiral benefits	-	-
TOTAL (C)	96,000	96,000

*Ms. Jyoti Sud was appointed as Company Secretary w.e.f. 25.02.2019 and as Chief Financial Officer w.e.f. 04.04.2019

VII. PENALTIES/ PUNISHMENT/ COMPOUNDING OF OFFENCES:

There were no penalties/punishments/compounding of offences for breach of any section of the Companies Act, 2013 against the Company, it's Directors or other officers in default, during the financial year ended March 31, 2020. However, the Company paid fine of Rs. 1,73,460 /- as imposed by the BSE Limited, Stock Exchange for non-appointment of Qualified Company Secretary as Compliance Officer as per Regulation 6(1) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the period prior to the appointment of Company Secretary. The regular Company Secretary as Compliance Officer was appointed on February 25, 2019.

**For and on behalf of the Board
For Kovalam Investment and Trading Company Limited**

Navdeep Sharma
Director
(DIN: 00454285)

Komal Jain
Director
(DIN: 00399948)

Place: Ludhiana
Date: 29.07.2020