

1	Name o	of the Company: Sadbhav Infrastructure Project Limited (CIN: L45202GJ2007PLC049808)											
2	Scrip C	ode, Name of the scrip, class of security: BSE CODE: 539346, NSE SYMBOL: SADBHIN, EQUIT	Υ										
3	Share I	Holding Pattern filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)											
	a.												
	b. If under 31(1)(c) then indicate date of allotment/extinguishment												
4	Declaration: The Listed entity is required to submit the following declaration to the extent of submission of information:-												
		Particulars	Yes*	No*									
	1	Whether the Listed Entity has issued any partly paid up shares?		No									
	2	Whether the Listed Entity has issued any convertible Securities or Warrants?		No									
	3	Whether the Listed Entity has issued any shares against which depository receipts are issued?		No									
	4	Whether the Listed Entity has issued any shares in locked-in?		No									
	5	Whether any shares held by Promoters are pledged or otherwise encumbered?	Yes										
	6	Whether the listed entity has equity shares with differential voting rights?		No									
	7	Whether the listed entity has any Significant Beneficial Owner?		No									

^{*} If the Listed Entity selects the option 'No' for the questions above, the columns for the partly paid up shares, Outstanding Convertible Securities/Warrants, depository receipts, locked-in shares, No. of shares pledged or otherwise encumbered by Promoters, as applicable, shall not be displayed at the time of dissemination on the Stock Exchange website. Also wherever there is 'No' declared by Listed Entity in above table the values will be considered as 'Zero' by default on submission of the format of holding of specified securities.



Table I - SUMMARY STATEMENT HOLDING OF SPECIFIED SECURITIES

AS ON 31-12-2020

Catego	Category of	No.s of	No.s of	No.s of	No. of	Total nos.	Shareholdin	Number of V	oting Rig	hts held in eac	h class of	No. of	Shareholding	Number of	Locked in	Number of Shares		Number of
ry	shareholder	Share	fully paid up	Partly	shares	shares	g as a % of		secu	urities		Shares	, as a %	shar	es	pledged or otherwise		equity
(1)	(11)	holders	equity	paid-up	underlying	held (VII)=	total no. of		(IX)		Underlying	assuming full	(XI)	encumbered		shares held
		(III)	Share held	equity	Depository	(IV)+(V)+(VI)	shares					Outstating	conversion of			(XIII)		in
			(IV)	Share	Receipts		(calculated					convertible	convertible					dematerializ
				held	(VI)		as per	No oj	Voting R	ights	Total	securities	securities (as					ed
				(V)			SCRR,1957)				as a	(including	a % of					form
							(VIII)				% of	Warrants)	diluted share					(XIV)
							As a % of				(A+B+C)	(X)	capital)	No.	As a % of		As a % of	
							(A+B+C2)	Class	Class	Total			(XI)=(VII)+(X)	(a)	total	(a)	total	
								Class	Others	rotar			As a % of		shares		shares	
								Equity	Others				(A+B+C2)		held		held	
															(b)		(b)	
(A)	Promoter & Promoter Group	3	247663736	0	0	247663736	70.31	247663736	0	247663736	70.31	0.00	70.31	0	0.00	196188285	79.22	247663736
(B)	Public shareholding	16661	104561480	0	0	104561480	29.69	104561480	0	104561480	29.69	0	29.69	0	0	NA	NA	104561477
(C)	Non Promoter-Non Public	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA	NA	0
(C1)	Sharesunderlying DRs	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA		0
(C2)	Shares held by Employee/Trust	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA	NA	0
	TOTAL	16664	352225216	0	0	352225216	100.00	352225216	0	352225216	100.00	0	100.00	0	0.00	196188285	55.70	352225213



Table II - STATEMENT SHOWING SHAREHOLDING PATTERN OF THE PROMOTER AND PROMOTER GROUP

AS ON 31-12-2020

	Category & Name of the shareholders (I)	PAN (II)	No.s of Share holders (III)	No.s of fully paid up equity Shares held (IV)	No.s of Partly paid-up equity Share held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII)= (IV)+(V)+(VI)	Shareholding % calculated as per SCRR,1957 (VIII) As a % of (A+B+C2)		Number of Vo held in each securi (IX) No of Voting Rights	h class of ities	Total as a % of (A+B+C)	No. of Shares Underlying Outstating convertible securities (including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities(as a % of diluted share capital) (XI)=(VII)+(X) As a % of	Loc sh (No.			Number of Shares pledged or otherwise encumbered (XIII) No. As a % of	
								_	Class Equity	Class Others	Total		(2)	(A+B+C2)	(a)	total shares held (b)	(a)	total shares held (b)	
1	INDIAN																		
(a)	Individuals/Hindu undivided Family		2	2027484	0	0	2027484		2027484	0.00	2027484			0.58		0.00	0	0.00	
1	Shantaben Vishnubhai Patel	ABGPP7486A	1	1213374	0	0	1213374	0.34	1213374	0	1213374	0.34	0	0.34		0.00	0	0.00	1213374
2	Shashin Vishnubhai Patel	AFRPP6274P	1	814110	0	0	814110	0.23	814110	0	814110	0.23	0	0.23		0.00	0	0.00	814110
(b)	Central Government/ State Governm	ent(s)	0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0.00	0
(c)	Financial Institutions/ Banks		0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0.00	0
(d)	Any Others (Specify)		1	245636252	0	0	245636252	69.74	245636252	0	245636252	69.74	0	69.74		0.00	196188285	79.87	245636252
	BODIES CORPORATE																		
1	Sadbhav Engineering Limited	AADCS0852Q	1	245636252	0	0	245636252	69.74	245636252	0	245636252	69.74	0	69.74		0.00	196188285	79.87	245636252
	Sub - Total (A) (1))	3	247663736	0	0	247663736	70.31	247663736	0	247663736	70.31	0	70.31		0.00	196188285	79.22	247663736
2	FOREIGN																		
(a)	Individuals (Non-Resident Individuals Individuals)	s/ Foreign	0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0	0
(b)	Government		0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0	0
(c)	Institutions		0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0	0
(d)	Foreign Portfolio Investor		0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0	0
(e)	Any Other (specify)		0	0	0	0	0	0	0	0	0	0	0	0		0 0	0	0	0
		Sub - Total (A) (2) 0	0	0	0	0	0.00	0	0	0	0.00	0	0.00		0.00	0	0.00	0
	Total Shareholding of Promoter and (A)= (A)(1)+(A)(2)	Promoter Group	3	247663736	0	0	247663736	70.31	247663736	0	247663736	70.31	0	70.31		0.00	196188285	79.22	247663736

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

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

Note

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

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

(3) Sadbhav Engineering Limited, a Promoter of the Company has submitted FORM C purusnat to Regulation 7 (2) read with Regulation 6 (2) – Continual disclosure of SEBI (Prohibition of Insider Trading) Regulations, 2015 towards acquisition of 150,000 shares on 24th December, 2020. Considering the same, 24,57,21,252 (69.76%) shares of the Company are held by Sadbhav Engineering Limited as on 31st December, 2020.

However, as per report received from Registrar and Transfer Agent, Sadbhav Engineering Limited has received delivery of 65,000 shares till 31st December, 2020 out of 150,000 shares. Accordingly, we are submitting shareholding pattern as per actual receipt of shares by Sadbhav Engineering Limited till 31st December, 2020. i.e. holding would be 24,56,36,252.



Table III - STATEMENT SHOWING SHAREHOLDING PATTERN OF THE PUBLIC SHAREHOLDER

AS ON 31-12-2020

Category & Name of the shareholders (I)	PAN (II)		No.s of Share holders (III)	No.s of fully paid up equity Share held (IV)	No.s of Partly paid-up equity Share held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII)= (IV)+(V)+(VI)	Shareholding % calculated as per SCRR,1957) (VIII) As a % of (A+B+C2)		held in ed	Votting Rights ach class of urities (IX)	Total as a % of (A+B+C)	No. of Shares Underlyin g Outstatin g convertibl e	of diluted	Locked	nber of in shares XIII) As a % of	ple ot enc	mber of Shares odged or herwise umbered (XIII)	Number of equity shares held in dematerialized form (XIV)
								Class Equity	Class Others	Total	(A+b+C)	securities (including Warrants) (X)	share capital) (XI)=(VII)+(X) As a % of (A+B+C2)	(a)	total shares held (b)	(a)	total shares held (b)		
1 INSTITUTIONS																			
(a) Mutual Funds		2	2,89,78,157	-	-	2,89,78,157		2,89,78,157	-	2,89,78,157	8.23		8.23			NA	NA	2,89,78,157	
Nippon Life India Trustee Ltd-A/C Nippon India Ed	AAATR0090B	1	2,42,25,931	1	-	2,42,25,931	6.88	2,42,25,931	_	2,42,25,931	6.88	-	6.88			NA	NA	2,42,25,931	
Hdfc Trustee Company Limited - Hdfc Tax Saverfu	AAATH1809A	1	47,52,226	-	-	47,52,226	1.35	47,52,226	-	47,52,226	1.35	5 -	1.35			NA	NA	47,52,226	
(b) Venture Capital Funds		-	-	-	-	-	0.00	-	-	-	-		0.00			NA			
(c) Alternate Investment Funds		-	-	-	-	-	-	-	-	-	-	-	0.00			NA	NA	-	
(d) Foreign Venture Capital Investors		-	-	-	-	-	0.00	-	-	-	-		0.00			NA		-	
(e) Foreign Portfolio Investors		7	92,27,222	-	-	92,27,222		92,27,222	-	92,27,222	2.62		2.62			NA			
Kuwait Investment Authority Fund F238	AAATK3858Q	1	50,32,842	-	-	50,32,842	1.43	50,32,842	-	50,32,842	1.43	-	1.43			NA	NA	50,32,842	
(f) Financial Institutions/ Banks		-	-	-	-	-	0.00	-	-	-	-	-	0.00			NA			
(g) Insurance Companies		1	6,40,535	-	-	6,40,535	0.18	6,40,535	-	6,40,535	0.18	-	0.18			NA		-, -,	
(h) Provident Funds/ Pension Funds		-	-	-	-	-	0.00	-	-	-	-	-	0.00			NA			
(i) Any Other (specify)		-	-	-	-	-	0.00	-	-	-	-		0.00			NA			
	Sub-Total (B)(1)	10	3,88,45,914	-	-	3,88,45,914	11.03	3,88,45,914	-	3,88,45,914	11.03	-	11.03	-		NA			
2 Central Government/ State Government(s)/ Pre	esident of India	-	-	-	-	-	0.00	-	-	-	-	-	0.00	-	-	NA	NA	-	
	Sub-Total (B)(2)	-	-	-	-	_	0.00	-	-	-	_		0.00			NA	NA	-	
3 Non-institutions		•	•			•			•	•		•					•		
(a.1) Individuals - i. Individual shareholders holding no	minal share	15,623	1,03,09,031	-	-	1,03,09,031	2.93	1,03,09,031	-	1,03,09,031	2.93	-	2.93	-	-	NA	NA	1,03,09,028	
capital up to Rs. 2 lakhs.							. ==						. ==						
(a.2) Individuals - ii. Individual shareholders holding no capital in excess of Rs. 2 lakhs.	ominal share	117	1,65,56,759	-	-	1,65,56,759	4.70	1,65,56,759	-	1,65,56,759	4.70	-	4.70		-	NA	NA	1,65,56,759	
(b) NBFCs registered with RBI		-	-	-	-	_	0.00	-		-	_					NA	NA	-	
(c) Employee Trusts		-	-	-	-	_	0.00	-	_	-	-		0.00	-		NA		-	
(d) Overseas Depositories (holding DRs) (balancing fi	gure)	-	-	-	-	-	0.00	-	-	-	-		0.00	-		NA	NA	-	
(e) Any Others		911	3,88,49,776	-	-	3,88,49,776	11.03	3,88,49,776	-	3,88,49,776	11.03	-	11.03			NA	NA	3,88,49,776	
Trust(Emplyess)		1	6,18,594	-	-	6,18,594	0.18	6,18,594		6,18,594	0.18	3	0.18			NA	NA	6,18,594	
Hindu Undivided Family		544	21,15,860	-	-	21,15,860	0.60	21,15,860	-	21,15,860	0.60		0.60			NA	NA	21,15,860	
Foreign Companies		1	1,72,21,860	-	-	1,72,21,860	4.89	1,72,21,860	-	1,72,21,860	4.89		4.89	-		NA	NA		
Norwest Venture Partners Vii-A-Mauritius	AADCN1034D	1	1,72,21,860	-	-	1,72,21,860	4.89	1,72,21,860	-	1,72,21,860	4.89	-	4.89			NA	NA		
Non Resident Indians (Non Repat)		50	8,41,294	-	-	8,41,294		8,41,294		8,41,294	0.24		0.24			NA	NA		
Non Resident Indians (Repat)		109	10,76,742	-	-	10,76,742		10,76,742	-	10,76,742	0.31	-	0.31			NA		10,76,742	
Office Bearers		1	3	-		3	0.00	3	-	3	0.00		0.00			NA			
Clearing Member		84	5,80,304		-	5,80,304		5,80,304		5,80,304	0.16		0.16			NA	NA		
Bodies Corporate		121	1,63,95,119		-	1,63,95,119		1,63,95,119		1,63,95,119	4.65		4.65	-		NA			
	Sub-Total (B)(3)	16,651	6,57,15,566		-	6,57,15,566		6,57,15,566		6,57,15,566	18.66		18.66	-		NA			
Total Public Shareholding (B)= (B)(1)+(B)((2)+(B)(3)	16,661	10,45,61,480	<u>-</u>	-	10,45,61,480	29.69	10,45,61,480	-	10,45,61,480	29.69	-	29.69	•	- -	NA	NA	10,45,61,477	

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

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

Note

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to disclose name of all holders holding more than 1% of total number of shares
- (3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available and the balance to be disclosed as held by custodian.



Table IV - STATEMENT SHOWING SHAREHOLDING PATTERN OF THE NON PROMOTER - NON PUBLIC SHAREHOLDER

AS ON 31-12-2020

	Category & Name of the shareholders (I)	PAN (II)	No.s of Share holders (III)		No.s of Partly paid-up equity Share held (V)	No. of shares underlying Depository Receipts (VI)	Total nos. shares held (VII)= (IV)+(V)+(VI)	Shareholding % calculated as per SCRR, 1957) (VIII) As a % of (A+B+C2)		Votting Rigi secu (I. No of Voting Rights	rities X)	Total as a % of (A+B+C)	No. of Shares Underlying Outstating convertible securities (including Warrants) (X)	Shareholding, as a % assuming full conversion of convertible securities(as a % of diluted share capital) (XI)=(VII)+(X) As a % of	Lo s No.	Number of Locked in shares (XII) No. As a % of		aber of ares ged or erwise mbered KIII) As a % of	Number of equity shares held in dematerialized form (XIV)
									Class Equity	Class Others	Total		(24)	(A+B+C2)	(a)	total shares held (b)	(a)	total shares held (b)	
1	Custodian/ DR Holder																		
(a)	Name of DR Holder (if available)	0	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA	NA	0
2	Employee Benefit Trust (under SEBI (share based Employee benfit) Regulations, 2014																		
(a)	Name	0	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA	NA	0
	Total Non Promoter- Non Public Shareholding (C)=(C1)+(C2)	0	0	0	0	0	0	0.00	0	0	0	0.00	0	0.00	0	0.00	NA	NA	0

Table V - Statement showing details of significant beneficial owners (SBOs)

AS ON 31-12-2020

Sr. No.	Details o	f the SBO		Details of the re	egistered o	wner	Details of holding/	exercise of right of the	company,	Date of creation / acquisition of	
	Name	PAN/	Nationalit	Name	PAN/	Nationalit		Whether by virt	significant beneficial interest#		
		Passport	у		Passport	у		Shares		(IV)	
		No. in			No. in			%			
		case of a			case of a		Rights on distribu	Rights on distributable dividend or any %			
		foreign			foreign			Exercise of control	No		
		national			national		Exercise of	Exercise of significant influence			
1	NIL	NIL		NIL	NIL		NIL	NIL	NIL	NIL	NIL