





<b>(2) Foreign</b>									
a) NRI Individuals	-	-	-	0.00%	-	-	-	0.00%	0.00%
b) Other Individuals	-	-	-	0.00%	-	-	-	0.00%	0.00%
c) Bodies Corp.	-	-	-	0.00%	-	-	-	0.00%	0.00%
d) Banks / FI	-	-	-	0.00%	-	-	-	0.00%	0.00%
e) Any other	-	-	-	0.00%	-	-	-	0.00%	0.00%
<b>Sub Total (A) (2)</b>	-	-	-	0.00%	-	-	-	0.00%	0.00%
<b>Total shareholding of Promoter (A) = (A)(1)+(A)(2)</b>	<b>14,67,990</b>	<b>-</b>	<b>14,67,990</b>	<b>55.66%</b>	<b>1,467,990</b>	<b>-</b>	<b>1,467,990</b>	<b>55.66%</b>	<b>0.00%</b>
<b>B. Public Shareholding</b>									
<b>1. Institutions</b>									
a) Mutual Funds	-	100	100	0.00%	-	100	100	0.00%	0.00%
b) Banks / FI	-	19,800	19,800	0.75%	-	19,800	19,800	0.75%	0.00%
c) Central Govt	-	-	-	0.00%	-	-	-	0.00%	0.00%
d) State Govt(s)	-	-	-	0.00%	-	-	-	0.00%	0.00%
e) Venture Capital Funds	-	-	-	0.00%	-	-	-	0.00%	0.00%
f) Insurance Companies	-	-	-	0.00%	-	-	-	0.00%	0.00%
g) FIs	-	-	-	0.00%	-	-	-	0.00%	0.00%
h) Foreign Venture Capital Funds	-	-	-	0.00%	-	-	-	0.00%	0.00%
i) Others (specify)	-	-	-	0.00%	-	-	-	0.00%	0.00%
<b>Sub-total (B)(1)</b>	<b>-</b>	<b>19,900</b>	<b>19,900</b>	<b>0.75%</b>	<b>-</b>	<b>19,900</b>	<b>19,900</b>	<b>0.75%</b>	<b>0.00%</b>
<b>2. Non-Institutions</b>									
a) Bodies Corp.									
i) Indian	2,51,868	1,10,100	361,968	13.72%	2,51,927	1,10,100	3,62,027	13.73%	0.01%
ii) Overseas	-	-	-	0.00%	-	-	-	0.00%	0.00%
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	1,20,372	3,48,200	4,68,572	17.77%	1,24,083	3,48,200	4,72,283	17.91%	0.14%
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	2,14,658	83,090	2,97,748	11.29%	2,13,803	83,090	2,96,893	11.26%	(0.03%)
c) Others (specify)									
i) Hindu Undivided Family (HUF)	17,289	-	17,289	0.66%	16,789	0	16,789	0.64%	(0.02%)
ii) Clearing Members	2,653	-	2,653	0.10%	238	-	238	0.00%	(0.10%)
iii) Non Resident Indians	1300	-	1300	0.05%	1300	-	1300	0.05%	0.00%



Sub-total (B)(2)	6,08,140	5,41,390	11,49,530	43.59	6,08,140	5,41,390	1149530	43.59	0.00
Total Public Shareholding (B)=(B)(1)+(B)(2)	6,08,140	5,61,290	11,69,430	44.34	6,08,140	5,61,290	11,69,430	44.34	0.00
C. Shares held by Custodian for GDRs & ADRs	-	-	-	0.00%	-	-	-	0.00%	0.00%
Grand Total (A+B+C)	20,76,130	5,61,290	26,37,420	100.00	20,76,130	5,61,290	26,37,420	100.00	0.00

**ii) Shareholding of Promoter:**

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year [As on 01-April-2020]			Shareholding at the end of the year [As on 31-March-2021]			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged/ encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Madan Paliwal (Miraj) Family Foundation	12,76,340	48.39%	0.00%	12,76,340	48.39%	0.00%	0.00%
2	Sushila Devi Paliwal	1,91,650	7.27%	0.00%	1,91,650	7.27%	0.00%	0.00%
	<b>Total</b>	<b>1,467,990</b>	<b>55.66%</b>	<b>0.00%</b>	<b>1,467,990</b>	<b>55.66%</b>	<b>0.00%</b>	<b>0.00%</b>

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

There is no change in promoters' shareholding during the Financial Year 2020-21.

**iv) Shareholding Pattern of Top Ten Shareholders:**

**(Other than Directors, Promoters and Holders of GDRs and ADRs):**

Sl. No.	Particulars	Date	Reason	Shareholding		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	Shri Kalyan Holdings Limited						
	At the beginning of the year			1,41,200	5.35%	-	-
	Changes during the year			-	0.00%	1,41,200	5.35%
	At the end of the year			1,41,200	5.35%	-	-
2	Mr. Shankar Das Vairagi						
	At the beginning of the year			1,00,000	3.79%	-	-
	Changes during the year			-	0.00%	1,00,000	3.79%
	At the end of the year			1,00,000	3.79%	-	-
3	Revati Mercantile Private Limited						
	At the beginning of the year			56,563	2.14%	-	-
	Changes during the year			-	0.00%	56,563	2.14%
	At the end of the year			56,563	2.14%	-	-
4	Mrs. Sadhna Anoop Gupta						
	At the beginning of the year			50,000	1.90%	-	-
	Changes during the year			-	0.00%	50,000	1.90%
	At the end of the year			50,000	1.90%	-	-



5	Tanish Equity Services Private Limited						
	At the beginning of the year			40,954	1.55%	-	-
	Changes during the year			-	0.00%	40,954	1.55%
	At the end of the year			40,954	1.55%	-	-
6	Mr. Manoj Mohan Chandra Javeri						
	At the beginning of the year			28,798	1.09%	-	-
	Changes during the year			-	0.00%	28,798	1.09%
	At the end of the year			28,798	1.09%	-	-
7	Mr. Sanjaykumar Sarawagi						
	At the beginning of the year			28241	1.07%	-	-
	Changes during the year	31.12.2020	Buy	1	0.00%	28242	1.07%
		08.01.2021	Buy	1	0.00%	28243	1.07%
		15.01.2021	Buy	1	0.00%	28244	1.07%
		29.01.2021	Sell	(511)	(0.02%)	27733	1.05%
		05.02.2021	Sell	(247)	(0.01%)	27486	1.04%
	At the end of the year			27486	1.04%	-	-
8	Kotak Mahindra Finance Limited						
	At the beginning of the year			22,800	0.86%	-	-
	Changes during the year			-	0.00%	22,800	0.86%
	At the end of the year			22,800	0.86%	-	-
9	Babaji Shivram Clearing and Carriers Private Limited						
	At the beginning of the year			20,400	0.77%	-	-
	Changes during the year			-	0.00%	20,400	0.77%
	At the end of the year			20,400	0.77%	-	-
10	Mr. Zoeb A. Dharwalla						
	At the beginning of the year			20,400	0.77%	-	-
	Changes during the year			-	0.00%	20,400	0.77%
	At the end of the year			20,400	0.77%	-	-
<b>(v) Shareholding of Directors and Key Managerial Personnel:</b>							
Sl. No.	Particulars	Date	Reason	Shareholding		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	Mr. Revant Purbia						
	At the beginning of the year			200	0.00%		
	Changes during the year			-	0.00%	200	0.00%
	At the end of the year			200	0.00%		
*Resigned from the office of Director cum CFO of the Company w.e.f. 31.01.2021							
2	Mr. Prakash Chandra Purohit						
	At the beginning of the year			-	0.00%		
	Changes during the year			-	0.00%	-	0.00%
	At the end of the year			-	0.00%		



3	Mr. Pushpendra Jain*						
	At the beginning of the year			-	0.00%		
	Changes during the year	10.09.2020	Buy	1	0.00%	1	0.00%
	At the end of the year			1	0.00%		
* Appointed as an Additional Director cum CFO of the Company w.e.f. 01.02.2021							
4	Mr. Sunil Upadhayay						
	At the beginning of the year			-	0.00%		
	Changes during the year			-	0.00%	-	0.00%
	At the end of the year			-	0.00%		
5	Mrs. Prabhjeet Kaur						
	At the beginning of the year			-	0.00%		
	Changes during the year			-	0.00%	-	0.00%
	At the end of the year			-	0.00%		
6	Mr. Jitendra Purohit						
	At the beginning of the year			-	0.00%		
	Changes during the year			-	0.00%	-	0.00%
	At the end of the year			-	0.00%		
7	Mr. Arpit Lodha*						
	At the beginning of the year			-	0.00%		
	Changes during the year	26.08.2020	Buy	1	0.00%	1	0.00%
	At the end of the year			1	0.00%	-	0.00%
*Resigned from the office of Company Secretary and Compliance Officer of the Company w.e.f. 31.07.2020							
8	Ms. Ankita Mata*						
	At the beginning of the year			-	0.00%	-	-
	Changes during the year	31.07.2020	Buy	10	0.00%	10	0.00%
		24.08.2020	Sell	(10)	(0.00%)	-	0.00%
	At the end of the year			-	0.00%	-	-
*Appointed as Company Secretary and Compliance Officer of the Company w.e.f. 01.08.2020							

#### V. INDEBTEDNESS:

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

Particulars	(Amount in Rupees)			
	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning</b>				
i) Principal Amount	-	-	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	-	-	-	-
<b>Change in Indebtedness during the financial year:</b>				
* Addition	-	-	-	-
* Reduction	-	-	-	-
<b>Net Change</b>	-	-	-	-
<b>Indebtedness at the end of the financial year:</b>				
i) Principal Amount	-	-	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	-	-	-	-



<b>VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:</b>							
<b>A. Remuneration to Managing Director, Whole-Time Director(s), Director(s) and/or Manager:</b>							
Company has not appointed any Managing Director, Whole-Time Directors and/or Manager during the financial year 2020-21, hence not applicable.							
<b>B. Remuneration to Other Directors:</b>							
Company has not paid any remuneration to Independent or Other Non-executive Directors during the financial year 2020-21, hence not applicable.							
<b>C. Remuneration to Key Managerial Personnel other than MD/Manager/WTD:</b>							
Sl. No.	Particulars of Remuneration	Name of Key Managerial Personnel					Total Amount (in Rs.)
		Jitendra Purohit	Arpit Lodha*	Ankita Mata**	Revant Purbia#	Pushpendra Jain##	
	Designation	Chief Executive Officer	Company Secretary	Company Secretary	Chief Financial Officer	Chief Financial Officer	
1	Gross salary	8,51,256	1,01,758	1,90,125	7,04,340	99,280	<b>19,46,759</b>
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	8,51,256	1,01,758	1,90,125	7,04,340	99,280	<b>19,46,759</b>
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-	-	-	-	-
2	Stock Option	-	-	-	-	-	-
3	Sweat Equity	-	-	-	-	-	-
4	Commission						
	- as % of profit	-	-	-	-	-	-
	- others, specify	-	-	-	-	-	-
5	Others, please specify	-	-	-	-	-	-
	<b>Total</b>	<b>8,51,256</b>	<b>1,01,758</b>	<b>1,90,125</b>	<b>7,04,340</b>	<b>99,280</b>	<b>19,46,759</b>
*Resigned from the office of Company Secretary and Compliance Officer w.e.f. 31.07.2020							
**Appointed as a Company Secretary and Compliance Officer of the Company w.e.f. 01.08.2020							
# Resigned from the office of Director cum Chief Financial Officer w.e.f. 31.01.2021							
## Appointed as an Additional Director cum Chief Financial Officer of the Company w.e.f. 01.02.2021							

<b>VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:</b>
There were no penalties / punishment / compounding of offences during the financial year 2020-21.

By Order of the Board of Directors  
For Asia Pack Limited

Sd/-

Name: **Prakash Chandra Purohit**  
Designation: **Director**  
DIN : **01383197**

Sd/-

Name: **Pushpendra Jain**  
Designation: **Additional Director**  
DIN : **03228950**

Date: 12<sup>th</sup> August, 2021  
Place: Nathdwara

Address: **Village-Uper Ki Oden, Teh- Nathdwara, Rajsamand, Rajasthan, India , PIN-313301**

Address: **8-9, Pragati Nagar, Shobhagpura, Udaipur, Rajasthan, India, PIN-313011**