

**Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

<b>1.</b>	<b>Name of Listed Entity: Spray Engineering Devices Limited</b>	
<b>2.</b>	<b>Scrip Code/Name of Scrip/Class of Security: 0</b>	
<b>3.</b>	<b>Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c)</b>	
	<b>a.</b>	<b>If under 31(1)(b) then indicate the report for Quarter ending</b>
	<b>b.</b>	<b>If under 31(1)(c) then indicate date of allotment/extinguishment</b>
<b>4.</b>	<b>Declaration: The Listed entity is required to submit the following declaration to the extent of submission of</b>	

	<b>Particulars</b>	<b>Yes*</b>	<b>No*</b>
<b>1</b>	<b>Whether the Listed Entity has issued any partly paid up shares?</b>		<b>No</b>
<b>2</b>	<b>Whether the Listed Entity has issued any Convertible Securities or Warrants?</b>		<b>No</b>
<b>3</b>	<b>Whether the Listed Entity has any shares against which depository receipts are</b>		<b>No</b>
<b>4</b>	<b>Whether the Listed Entity has any shares in locked-in?</b>		<b>No</b>
<b>5</b>	<b>Whether any shares held by promoters are pledge or otherwise encumbered?</b>		<b>No</b>

**\* 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.**

**GENERATED ON :11/09/2024****NSDL : 06/09/2024****CDSL :06/09/2024**

Spray Engineering Devices Limited																			
Table I - Summary Statement holding of specified securities																			
Category	Category of shareholder	Nos. of shareholders	No. of fully paid up equity shares held	No. of Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding as a % of total no. of shares (calculated as per SCRR, 1957)	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in demateriali sed form	
								No of Voting Rights			Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held(b)		
								Class eg: X	Class eg: y	Total									
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII) As a	(IX)				(X)	(XI)=	(XII)		(XIII)		(XIV)	
(A)	Promoter & Promoter Group	2	17636648	0	0	17636648	70.2755	17636648	0	17636648	70.2755	0	70.2755	0	0.0000	0	0.0000	17636648	
(B)	Public	427	7438150	0	0	7438150	29.6383	7438150	0	7438150	29.6383	0	29.6383	0	0.0000	NA	NA	4388151	
(C)	Non Promoter - Non Public				0				0		0				0.0000	NA	NA		
(C1)	Shares Underlying DRs	0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0	
(C2)	Shares Held By Employee Trust	1	21625	0	0	21625	0.0862	0	0	0	0.0000	0	0.0862	0	0.0000	NA	NA	21625	
	Total	430	25096423	0	0	25096423	100.0000	25074798	0	25074798	100.0000	0	100.0000	0	0.0000	0	0.0000	22046424	
GENERATED ON :11/09/2024                      NSDL : 06/09/2024                      CDSL :06/09/2024																			

Spray Engineering Devices Limited																				
Table II - Statement showing shareholding pattern of the Promoter and Promoter Group																				
	Category & Name of the shareholders	Entity Type	PAN	Nos. of share holders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Sharehold ing % calculat ed as per SCRR, 1957 As a % of (A+B+C 2)	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstandin g convertible securities (including Warrants)	Shareholdin g , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital)	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerial ised form
										No of Voting Rights			Total as a % of Total Voting Rights			No. (a)	As a % of total Shares held(b )	No. (a)	As a % of total Shares held(b )	
										Class eg: X	Class eg: y	Total								
1	(I)		(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII)	(IX)				(X)	(XI)=	(XII)		(XIII)		(XIV)
(a)	Indian Individuals / Hindu Undivided Family			2	17636648	0	0	17636648	70.2755	17636648	0	17636648	70.2755	0	70.2755	0	0.0000	0	0.0000	17636648
	Vivek Verma	Promoters	AAPPV4136M	1	12193918	0	0	12193918	48.5883	12193918	0	12193918	48.5883	0	48.5883	0	0.0000	0	0.0000	12193918
	Prateek Verma	Promoters	AAJPV1651K	1	5442730	0	0	5442730	21.6873	5442730	0	5442730	21.6873	0	21.6873	0	0.0000	0	0.0000	5442730
(b)	Central Government / State Government(s)			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Financial Institutions / Banks			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(d)	Any Other (Specify)			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Sub Total (A)(1)			2	17636648	0	0	17636648	70.2755	17636648	0	17636648	70.2755	0	70.2755	0	0.0000	0	0.0000	17636648
2	Foreign																			
(a)	Individuals (Non-Resident Individuals /			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(b)	Government			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(c)	Institutions			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(d)	Foreign Portfolio Investor			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
(e)	Any Other (Specify)			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Sub Total (A)(2)			0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	0	0.0000	0
	Total Shareholding Of Promoter And Promoter			2	17636648	0	0	17636648	70.2755	17636648	0	17636648	70.2755	0	70.2755	0	0.0000	0	0.0000	17636648

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.

**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.

GENERATED ON :11/09/2024

NSDL : 06/09/2024

CDSL :06/09/2024

Spray Engineering Devices Limited																							
Table III - Statement showing shareholding pattern of the Public shareholder																							
	Category & Name of the shareholders	PAN	Nos. of share holders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C 2)	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share capital )	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	Sub-categorization of shares			
									No of Voting Rights			Total as a % of Total Voting Rights			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held (b)		Shareholding(No. of shares) under	Sub-category(i)	Sub-category(ii)	Sub-category(iii)
									Class eg: X	Class eg: y	Total												
									1	(I)	(II)	(III)	(IV)	(V)	(VI)	(VII) =	(VIII)	(IX)				(X)	(XI)=
(a)	Mutual Fund		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b)	Venture Capital Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(c)	Alternate Investment Funds		3	126429	0	0	126429	0.5038	126429	0	126429	0.5038	0	0.5038	0	0.0000	NA	NA	126429	0	0	0	
(d)	Banks		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(e)	Insurance Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(f)	Provident Funds/ Pension Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(G)	Asset Reconstruction Companies		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(h)	Sovereign Wealth Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(i)	NBFCs registered with RBI		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(j)	Other Financial Institutions		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(k)	Any Other (Specify)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
	Sub Total (B)(1)		3	126429	0	0	126429	0.5038	126429	0	126429	0.5038	0	0.5038	0	0.0000	NA	NA	126429	0	0	0	
2	Institutions (Foreign)																						
(a)	Foreign Direct Investment		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b)	Foreign Venture Capital Investors		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(c)	Sovereign Wealth Funds		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(d)	Foreign Portfolio Investors Category I		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(e)	Foreign Portfolio Investors Category II		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(f)	Overseas Depositories(holding DRs)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(g)	Any Other (Specify)		1	2823348	0	0	2823348	11.2500	2823348	0	2823348	11.2500	0	11.2500	0	0.0000	NA	NA	0	0	0	0	
	Foreign Institutional Investors		1	2823348	0	0	2823348	11.2500	2823348	0	2823348	11.2500	0	11.2500	0	0.0000	NA	NA	0	0	0	0	
	Klondike Investments Ltd		1	2823348	0	0	2823348	11.2500	2823348	0	2823348	11.2500	0	11.2500	0	0.0000	NA	NA	0				
	Sub Total (B)(2)		1	2823348	0	0	2823348	11.2500	2823348	0	2823348	11.2500	0	11.2500	0	0.0000	NA	NA	0	0	0	0	
3	Central Government/ State Government(s)																						
(a)	Central Government / President of India		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(b)	State Government / Governor		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
(C)	Shareholding by Companies or Bodies Corporate where Central /		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				
	Sub Total (B)(3)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0				

4	Non-Institutions			0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(a)	Associate companies / Subsidiaries		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(b)	Directors and their relatives (excluding Independent Directors and		2	11000	0	0	11000	0.0438	11000	0	11000	0.0438	0	0.0438	0	0.0000	NA	NA	0	0	0	0
(C)	Key Managerial Personnel		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
	Relatives of promoters (other than 'immediate relatives' of promoters disclosed under 'Promoter and Promoter Group'																					
(D)	Trusts where any person belonging to 'Promoter and Promoter Group' category is		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(E)	'trustee', 'beneficiary', or		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(f)	Investor Education and Protection Fund (IEPF)		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(g)	i. Resident Individual holding nominal share capital up to Rs. 2 lakhs.		377	1048093	0	0	1048093	4.1763	1048093	0	1048093	4.1763	0	4.1763	0	0.0000	NA	NA	832442	0	0	0
(h)	ii. Resident individual holding nominal share capital in excess of Rs. 2		20	2365489	0	0	2365489	9.4256	2365489	0	2365489	9.4256	0	9.4256	0	0.0000	NA	NA	2365489	0	0	0
	Mukul Mahavir Agrawal	AAFP4859G		801693	0	0	801693	3.1945	801693	0	801693	3.1945	0	3.1945	0	0.0000	NA	NA	801693			
(I)	Non Resident Indians (NRIs)		3	48826	0	0	48826	0.1946	48826	0	48826	0.1946	0	0.1946	0	0.0000	NA	NA	48826	0	0	0
(j)	Foreign Nationals		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0			
(k)	Foreign Companies		4	801691	0	0	801691	3.1944	801691	0	801691	3.1944	0	3.1944	0	0.0000	NA	NA	801691	0	0	0
	Resonance Opportunities Fund	AAFCR4798A	1	348561	0	0	348561	1.3889	348561	0	348561	1.3889	0	1.3889	0	0.0000	NA	NA	348561			
	Minerva Ventures Fund	AAQCM6132Q	1	278849	0	0	278849	1.1111	278849	0	278849	1.1111	0	1.1111	0	0.0000	NA	NA	278849			
(l)	Bodies Corporate		4	14177	0	0	14177	0.0565	14177	0	14177	0.0565	0	0.0565	0	0.0000	NA	NA	14177	0	0	0
(m)	Any Other (Specify)		13	199097	0	0	199097	0.7933	199097	0	199097	0.7933	0	0.7933	0	0.0000	NA	NA	199097	0	0	0
	Body Corp-Ltd Liability Partnership		4	99711	0	0	99711	0.3973	99711	0	99711	0.3973	0	0.3973	0	0.0000	NA	NA	99711	0	0	0
	Hindu Undivided Family		9	99386	0	0	99386	0.3960	99386	0	99386	0.3960	0	0.3960	0	0.0000	NA	NA	99386	0	0	0
	Sub Total (B)(4)		423	4488373	0	0	4488373	17.8845	4488373	0	4488373	17.8845	0	17.8845	0	0.0000	NA	NA	4261722	0	0	0
	Total Public Shareholding (B)=		427	7438150	0	0	7438150	29.6383	7438150	0	7438150	29.6383	0	29.6383	0	0.0000	NA	NA	4388151	0	0	0

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

No. of shareholders	No. of Shares	%
0		

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.

No. of shareholders	No. of Shares
0	

#### Note

- (1) PAN would not be displayed on website of Stock Exchange(s).
- (2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII) is not applicable in the above format.
- (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.
- (4) Categorization and disclosure of each shareholder category should be carried out in the order prescribed in the above format. If a shareholder is falling under more than one category, then the same shall be classified in the category falling first in
- (5) Sub-categorization of shares under column no.(XV) will be based on shareholding(no. of shares) under the following sub-categories:
  - (i) Shareholder who are represented by a nominee Director on the board of the listed entity or have the right to nominate a representative(i.e. Director) on the board of the listed entity.
  - (ii) Shareholder who have entered into shareholder agreement with the listed entity.
  - (iii) Shareholders acting as persons in concert with promoters.

Spray Engineering Devices Limited																			
Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder																			
Category & Name of the shareholders	PAN	Nos. of share holders	No. of fully paid up equity shares held	Partly paid-up equity shares held	No. of shares underlying Depository Receipts	Total nos. shares held	Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2 )	Number of Voting Rights held in each class of securities				No. of Shares Underlying Outstanding convertible securities (including Warrants)	Shareholding , as a % assuming full conversion of convertible securities ( as a percentage of diluted share	Number of Locked in shares		Number of Shares pledged or otherwise encumbered		Number of equity shares held in dematerialised form	
								No of Voting Rights			Total as a % of (A+B+C)			No. (a)	As a % of total Shares held(b)	No. (a)	As a % of total Shares held (b)		
								Class eg: X	Class eg: y	Total									
(I)	(II)	(III)	(IV)	(V)	(VI)	(VII)	(VIII) As	(IX)				(X)	(XI)=	(XII)		(XIII)		(XIV)	
1 Custodian/DR Holder		0	0	0	0	0	0.0000	0	0	0	0.0000	0	0.0000	0	0.0000	NA	NA	0	
2 Employee Benefit Trust / Employee Welfare Trust under SEBI (Share based Employee Benefits and Sweat Equity) Regulations, 2021		1	21625	0	0	21625	0.0862	21625	0	21625	0.0862	0	0.0862	0	0.0000	NA	NA	21625	
Total Non-Promoter-Non Public Shareholding (C)= (C)(1)+(C)(2)		1	21625	0	0	21625	0.0862	21625	0	21625	0.0862	0	0.0862	0	0.0000	NA	NA	21625	

Note :

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

(2) The above format needs to be disclosed along with the names of the shareholders holding 1% or more than 1% of shares of the listed entity. Column no.(XIII)is not applicable in the above format.

(3) W.r.t. the information pertaining to Depository Receipts, the same may be disclosed in the respective columns to the extent information available.

GENERATED ON :11/09/2024

NSDL : 06/09/2024

CDSL :06/09/2024