COMPLEX TRADING CO LTD

119, PARK STREET, GROUND FLOOR, KOLKATA (W.B.) 700016 **CIN: L01409WB1981PLC033261**

Date: 03/01/2023

To
The Secretary
Calcutta Stock Exchange Limited
7 Lyons Range Kolkata - 700001

Scrip Code: 13159

Sub: SUBMISSION OF SHAREHOLDING PATTERN FOR THE QUARTER ENDED 31ST DECEMBER, 2022

With reference to the captioned subject, this is to inform you that Shareholding pattern has been annexed with this letter for the quarter ended 31st December, 2022.

We request you to kindly take the same on your record.

Thanking you,

For, Complex Trading Co Limited

Ravi Shah

Director

DIN: 02113586

225/23, Simplex Colony, Malviya Nagar – 491001

Off: 65, Industrial Estate, Bhilai (Chhattisgarh) - 490026

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

| 1. | | lame of Listed Entity: Complex Trading Co Ltd | | | | | | | | | | |
|----|---|--|--|--|--|--|--|--|--|--|--|--|
| 2. | Scrip Co | crip Code/Name of Scrip/Class of Security: 13159/ EQUITY SHARES | | | | | | | | | | |
| 3. | Share H | Share Holding Pattern Filed under: Reg. 31(1)(a)/Reg. 31(1)(b)/Reg.31(1)(c) | | | | | | | | | | |
| | a. | If under 31(1)(b) then indicate the report for Quarter ending 31st December 2022 | | | | | | | | | | |
| | 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 any shares against which depository receipts are issued? | | No |
| 4 | Whether the Listed Entity has any shares in locked-in? | | No |
| 5 | Whether any shares held by promoters are pledge or otherwise encumbered? | | 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.

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Complex Trading Co Ltd
Table I - Summary Statement holding of specified securities

| | | | | No. of | No. of | | Sharehold ing as a % of total no. of | | | hts held in e | each class | Underlyin | assuming | Number o | f Locked in | Number o | r otherwise | Number |
|----------|-------------------------------|-------------------|------------|--------|------------|------------|---|---------------------|-------------|---------------|---------------------------|------------|------------|----------|-----------------|----------|-----------------|-------------------|
| | | | No. of | Partly | shares | | shares | | | | | ng | conversio | | | | | of equity |
| | | I amount | fully paid | E | underlyin | Total nos | (calculate | No of Voting Rights | | Total ac | | convertibl | | | As a % of | | As a % of total | shares held in |
| | | Nos. of sharehold | up equity | shares | Depositor | Total nos. | SCRR, | | | | Total as a % of | securities | convertibl | | total Shares | | Shares | demateria |
| Category | Category of shareholder | ers | held | held | y Receipts | 100 10000 | 1957) | Class eg: X | Class eg: y | Total | Toronto areas to the con- | (including | 0.00 | No. (a) | held(b) | No. (a) | held(b) | lised form |
| (1) | (11) | (111) | (IV) | (V) | (VI) | (VII) = | (VIII) As a | | (1 | (IX) | | (X) (XI)= | | (XII) | | (XIII) | | (XIV) |
| (A) | Promoter & Promoter Group | 2 | 8400 | 0 | 0 | 8400 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 2.13 | 0 | 0 | 0 | 0 | 0 |
| (B) | Public | 736 | 385270 | 0 | 0 | 385270 | 97.87 | 385270 | 0 | 385270 | 97.87 | 0 | 97.87 | 0 | 0 | 0 | 0 | 0 |
| (C) | Non Promoter - Non Public | | | | 0 | | | | 0 | | | 0 | | | 0 | 0 | 0 | |
| (C1) | Shares Underlying DRs | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (C2) | Shares Held By Employee Trust | 0 | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | 738 | 393670 | 0 | 0 | 393670 | 100.00 | 393670 | 0 | 393670 | 100.00 | 0 | 100.00 | 0 | 0 | 0 | 0 | 0 |



Complex Trading Co Ltd Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

| | | | | | No. of | 1 1 | No. of | | Sharehol ding % calculate d as per | Number of Voting Rights held in each | | | | Underlyi % ng assu | ing , as a % assuming full | Ssuming Number of Lo | | Number of Shares Locked in pledged or otherwise | | Number |
|-----|---|-------------|------------|---------|---------|---------|----------|---------|---|--------------------------------------|---------------------|-------|----------|-----------------------|-------------------------------------|----------------------|-----------|---|-----------|------------|
| | | | | | fully | Partly | underlyi | | SCRR, | | | | | ding | conversio | | | | | of equity |
| | | | | | paid up | paid-up | ng | Total | 1957 As | No of Vot | tina Diahta | | | converti | Louisenmontenant and | | As a % of | | As a % of | shares |
| | | | | Nos. of | equity | equity | Deposito | nos. | a % of | 140 01 00 | lo of Voting Rights | | Total as | ble | convertibl | | total | | total | held in |
| | | | | shareh | shares | shares | ry | shares | (A+B+C2 | Class eg: | Class eg: | | a % of | securitie | e | | Shares | | Shares | demateria |
| | Category & Name of the shareholders | Entity Type | PAN | olders | held | held | Receipts | held |) | Х | У | Total | (A+B+C) | S | securities | No. (a) | held(b) | No. (a) | held(b) | lised form |
| | (1) | | (11) | (111) | (IV) | (V) | (VI) | (VII) = | (VIII) As | | (1 | X) | | (X) | (XI)= | () | KII) | () | (III) | (XIV) |
| 1 | Indian | | | | | | | | | | | | | | | | | | | |
| (a) | Individuals / Hindu Undivided Family | | | 2 | 8400 | 0 | 0 | 8400 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 2.13 | 0 | 0 | 0 | 0 | 0 |
| | Ravi Shah | Promoters | BQYPS8031C | 1 | 7600 | 0 | 0 | 7600 | 1.93 | 7600 | 0 | 7600 | 1.93 | 0 | 1.93 | 0 | 0 | 0 | 0 | 0 |
| | Nehal Shah | Promoters | AXYPS7334L | 1 | 800 | 0 | 0 | 800 | 0.20 | 800 | 0 | 800 | 0.20 | 0 | 0.20 | 0 | D | 0 | 0 | 0 |
| | Central Government / State | | | | | | | | | | | | | | | | | | | |
| (b) | Government(s) | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (c) | Financial Institutions / Banks | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (d) | Any Other (Specify) | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Bodies Corporate | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Sub Total (A)(1) | | | 2 | 8400 | 0 | 0 | 8400 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 2.13 | 0 | 0 | 0 | 0 | 0 |
| 2 | Foreign | | | | | | | | | | | | | | | | | | | |
| | Individuals (Non-Resident Individuals / | | | | | | | | | | | | | | | | | | | |
| (a) | Foreign Individuals) | | | 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 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total Shareholding Of Promoter And | | | | | | | | | | | | | | | | | | | |
| | Promoter Group (A)= $(A)(1)+(A)(2)$ | | | 2 | 8400 | 0 | 0 | 8400 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 2.13 | 0 | 0 | 0 | 0 | 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.

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.



Complex Trading Co Ltd Table III - Statement showing shareholding pattern of the Public shareholder Sharehold No. of Shares ing, as a Number of Shares Underlyin |% Number of Voting Rights held in Number of Locked in pledged or otherwise assuming each class of securities shares encumbered No. of Outstandi full No. of shares conversio Number Shareholding No of Voting Rights fully Partly underlyi convertibl n of of equity paid-up paid up ng Total % calculated convertibl As a % of As a % of shares Nos. of equity Deposito nos. equity as per SCRR. Total as securities e total total held in sharehol shares 1957 As a % shares ry shares a % of (including securities Class Class Shares Shares demateria Category & Name of the shareholders PAN ders held held Receipts held of (A+B+C2) eg: X eg: y Total (A+B+C) Warrants) (as a No. (a) held(b) held(b) No. (a) lised form (VII) =(VII)+(X)(IV)+(V)+ (VIII) As a % As a % of (1) (11) (111) (IV) (V) (VI) (VI) of (A+B+C2) (IX) (X) (A+B+C2) (XII) (XIII) (XIV) Institutions (a) Mutual Fund 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA 0 (b) Venture Capital Funds 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA (c) Alternate Investment Funds 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA 0 (d) Foreign Venture Capital Investors 0 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA 0 (e) Foreign Portfolio Investor 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA 0 Financial Institutions / Banks 0 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA 0 Insurance Companies 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA (h) Provident Funds/ Pension Funds 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 NA NA 0.0000 0 Any Other (Specify) 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 NA NA 0.0000 Sub Total (B)(1) 0 0 0.0000 0 0 0 0.0000 0.0000 0.0000 NA NA 0 Central Government/ State Government(s)/ President of India Sub Total (B)(2) 0 0 0 0 0.0000 0 0 0 0.0000 0.0000 0 0.0000 NA NA Non-Institutions (a) Individuals 0 0 0 NA NA i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs. 736 385270 0 385270 97.87 385270 0 385270 97.87 97.87 NA NA 0 SHAILESH A. SHAH AJAPS5108C 6910 6910 1.76 6910 0 6910 1.76 1.76 0 0 0 ARVIND S.SHAH AVBPS1788D 10750 0 0 10750 2.73 10750 0 10750 2.73 2.73 0 ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs. 0 0 0 NA NA NBFCs registered with RBI (b) 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Trust Employee 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Overseas Depositories(holding DRs) (balancing (d) figure) 0 0 0 0 NA NA (c) Any Other (Specify) 0 0 0 0 0 0 0 lo 0 0 0 0 0 NA NA 0 **IEPF** 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Hindu Undivided Family 0 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Non Resident Indians (Non Repat) 0 0 0 0 0 0 0 0 0 0 0 NA 0 NA 0 Non Resident Indians (Repat) 0 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Body Corp-Ltd Liability Partnership 0 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Clearing Member 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 **Bodies Corporate** 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0 Sub Total (B)(3) 0 0 0 0 0 0 0 0 0 0 0 0 0 0 NA NA 0

0

0

0

0

0

0

0

0

NA

NA

Total Public Shareholding (B)=

(B)(1)+(B)(2)+(B)(3)

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

| No. of shareholders | No. of Shares |
|---------------------|---------------|
| | |

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 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.

| Comp | lex Trading Co Ltd | | | | | | | | | | | | | | | | | | | | | | | | |
|------|--|-----------|-------------|------------|-------------|------------|---------|-------------|------------------------------|-----------------------------|-----------------|------------|-------------------|------------|--------------------|------------|-------------------|-----------|------------|-----------|---------------------|--|---|-----------|--|
| | V - Statement showing shareholding pattern | of the I | lon Promo | ter- Non | Public sha | reholder | | | | | | | | | | | | | | | | | | | |
| | g and a second g passes in | 01 1110 1 | 10111101110 | 11011 | i done sine | archolaci | | | | | | | | | | | | | | | | | | | |
| | | 1 | 1 | | | T | T | 1 | T | | | | T | | | | | | | | | | | | |
| | | | | | | | | | | | | T T | | 1" | | S | | T | | ing, as a | | | Number | of Chause | |
| | | | | | | | | Sharehold | Number of Voting Rights held | | ing Pights hold | | oting Dights hold | | Voting Pights hold | | oting Dights hold | | Underlyin | 1000 | Number of Locked in | | Number of Shares in pledged or otherwise | | |
| | | | | | | | | ing % | | in each class of securities | | g | assuming | shares | i Lockeu III | encumbered | | | | | | | | | |
| | | | | | | No. of | | | meac | | | Outstandi | full | Silates | | encumbe | Teu | Number | | | | | | | |
| | | | | No. of | Partly | shares | | as per | | | | ng convers | | | | | | of equity | | | | | | | |
| | ű. | | | VIEWS 1000 | 100 | underlyin | | SCRR, | No of | Voting Ri | ghts | as a % | convertibl | n of | | As a % of | | As a % of | shares | | | | | | |
| | | | Nos. of | | equity | g | | 1957 As a | | | Ĭ | of | e | convertibl | | total | | total | held in | | | | | | |
| | | | sharehold | shares | shares | Depositor | | % of | Class | (2000) 14 (2000) | | (A+B+ | securities | е | | Shares | | Shares | demateria | | | | | | |
| | Category & Name of the shareholders | PAN | ers | held | held | y Receipts | held | (A+B+C2) | eg: X | eg: y | Total | (C) | (including | securities | No. (a) | held(b) | No. (a) | held(b) | lised form | | | | | | |
| | (1) | (11) | (III) | (IV) | (V) | (VI) | (VII) = | (VIII) As a | | (1 | X) | | (X) | (XI)= | () | (II) | (| 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 | | | | | | |
| | Employee Benefit Trust (under SEBI (Share based | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | Employee Benefit) Regulations, 2014) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | NA | NA | 0 | | | | | | |
| | Total Non-Promoter- Non Public Shareholding (C)= | | | | | | | | | | | | | | | | | | | | | | | | |
| | (C)(1)+(C)(2) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | NA | NA | 0 | | | | | | |

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.

Complex Trading Co Ltd
Table V -Significant Beneficial Owners

| | | | Details of | the SBO | | | | Details o | f the registe | ed owner | | Details of | | | | | |
|---------|------|-----|---|---------|-----------------|---|------|-----------|---|----------|---|------------|------------------|--|------------|--|---|
| | | | | | | | | | | | | | Date of | | | | |
| Sr. No. | Name | PAN | Passport No. in case of a foreign national | 2 | Nationalit y | Nationality (Applicable in case of Any other is selected) | Name | PAN | Passport No. in case of a foreign national | | Nationality (Applicable in case of Any other is selected) | Shares | Voting rights | Rights on distributabl e dividend or any other distribution | of control | Exercise of significant influence | creation / acquisitio n of significant beneficial interest |
| | NIL | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | menta la | | | | | | |

