

COMPLEX TRADING CO LTD

119, PARK STREET, GROUND FLOOR, KOLKATA (W.B.) 700016

CIN:L01409WB1981PLC033261

Date: 05.04.2022

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

Scrip Code:13159

Sub: Submission of Quarterly and yearly Report ended 31st March 2022.

With reference to the captioned subject please find enclosed herewith the following Report for the Quarter and year ended 31st March ,2022:

- Certificate under Clause 40(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the half year ended 31st March ,2022
- Reconciliation of Share Capital Audit report
- Investor Complaint pursuant to Regulation 13(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Confirmation in terms of SEBI Circular dated November 26, 2018
- Intimation of Board Meeting under regulation 29 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Shareholding Pattern under regulation 31 of the SEBI of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Compliance Certificate under regulation 7(3) of the SEBI of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Compliance under Regulation 30(1) & (2) of the SEBI SAST Regulations
- Undertaking for non-applicability of Corporate Governance Report under regulation 27(2) of the SEBI LODR Regulations

Please find the above in order.

Thanking you,

For, Complex Trading Co Limited


Ravi Shah
Director

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

| | |
|----|---|
| 1. | Name of Listed Entity: Complex Trading Co Ltd |
| 2. | Scrip Code/Name of Scrip/Class of Security: 13159/ EQUITY SHARES |
| 3. | 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 MARCH 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.

Complex Trading Co. Ltd.


Director

Complex Trading Co Ltd

Table 1 - Summary Statement holding of specified securities

| Category (I) | Category of shareholder (II) | Nos. of sharehold ers (III) | No. of fully paid up equity shares held (IV) | No. of Partly paid-up equity shares held (V) | No. of shares underlyin g (VI) | Sharehold ing as a % of total no. of shares (calculate d as per SCRR, 1957) (VIII) As a | Number of Voting Rights held in each class of securities | | | Shares Underlyin g (X) | ing, as a % assuming full conversio n of convertibl e securities (including securities (XI)= | Number of Locked in shares | | Number of Shares pledged or otherwise encumbered | | Number of equity shares held in demateria lised form (XIV) |
|-----------------|---------------------------------|--------------------------------------|---|--|--|--|---|------------------------------|-------------------------------|---------------------------------|---|--|-------------------|--|---|--|
| | | | | | | | No of Voting Rights Class eg: X | Class eg: y Total (IX) | Total as a % of (A+B+C) | | | As a % of total Shares held(b) (XII) | No. (a) (XIII) | As a % of total Shares held(b) (XIII) | | |
| (A) | Promoter & Promoter Group | 2 | 8400 | 0 | 0 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 0 | 0 | 0 | 0 | 0 |
| (B) | Public | 736 | 385270 | 0 | 0 | 97.87 | 385270 | 0 | 385270 | 97.87 | 0 | 0 | 0 | 0 | 0 | 0 |
| (C) | Non Promoter - Non Public | | | | 0 | | | 0 | | | | 0 | 0 | 0 | 0 | 0 |
| (C1) | Shares Underlying DRs | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (C2) | Shares Held By Employee Trust | 0 | 0 | 0 | 0 | 0.00 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total | 738 | 393670 | 0 | 0 | 100.00 | 393670 | 0 | 393670 | 100.00 | 0 | 0 | 0 | 0 | 0 | 0 |

Complex Trading Co. Ltd.

Director

Complex Trading Co Ltd

Table II - Statement showing shareholding pattern of the Promoter and Promoter Group

| | Category & Name of the shareholders (I) | Entity Type | PAN | Nos. of shareholders (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | No. of shares underlying Depository Receipts (VI) | Total nos. shares held (VII) = (IV) + (V) + (VI) | Shareholding % as per SCRR, 1957 As a % of (A+B+C2) (VIII) As a | Number of Voting Rights held in each class of securities | | | Shares Underlying Outstanding convertible securities (including securities held(b) (X)) = (XI) = | Number of Locked in shares | | Number of Shares pledged or otherwise encumbered | | Number of equity shares held in dematerialised form (XIV) | |
|-----|---|-------------|------------|-------------------------------|---|--|--|---|--|--|-------------|---------------|--|----------------------------|--------------------------------|--|--------------------------------|--|---------------------|
| | | | | | | | | | | Class eg: X | Class eg: Y | Total (A+B+C) | | No. (a) | As a % of total Shares held(b) | No. (a) | As a % of total Shares held(b) | | |
| | | | | | | | | | | | | | | | | | | | No of Voting Rights |
| 1 | Indian Individuals / Hindu Undivided Family | | | | | | | | | | | | | | | | | | |
| (a) | Ravi Shah | Promoters | BQYPS8031C | 2 | 8400 | 0 | 0 | 8400 | 2.13 | 8400 | 0 | 8400 | 2.13 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Nehal CHHEDA | Promoters | AXYP57334L | 1 | 7600 | 0 | 0 | 7600 | 1.93 | 7600 | 0 | 7600 | 1.93 | 0 | 0 | 0 | 0 | 0 | 0 |
| | | | | 1 | 800 | 0 | 0 | 800 | 0.20 | 800 | 0 | 800 | 0.20 | 0 | 0 | 0 | 0 | 0 | 0 |
| (b) | Central Government / State Government(s) | | | 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 |
| (d) | Any Other (Specify) Bodies Corporate | | | 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 | 0 | 0 | 0 | 0 | 0 |
| 2 | Foreign Individuals (Non-Resident Individuals / Foreign Individuals) | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (a) | Government | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (b) | Institutions | | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (c) | Foreign Portfolio Investor | | | 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 |
| (e) | Sub Total (A)(2) | | | 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 | 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.
Director

Complex Trading Co Ltd

Table III - Statement showing shareholding pattern of the Public shareholder

| 1 | Category & Name of the shareholders (I) | PAN (II) | Nos. of shareholders (III) | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | No. of shares underlying Depository Receipts (VI) | Total nos. shares held (VII) = (IV) + (V) + (VI) | Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) (VIII) As a % | Number of Voting Rights held in each class of securities (IX) | | | Shares Underlying Outstanding convertible securities (including securities convertible into securities) (X) | Conversion % assuming full conversion of convertible securities (XI) = | Number of locked in shares (XII) | | Number of Shares pledged or otherwise encumbered (XIII) | | Number of equity shares held in dematerialised form (XIV) |
|-----|---|------------|----------------------------|--|---------------------------------------|---|--|--|---|-------------|---------------|---|--|----------------------------------|--------------------------------|---|--------------------------------|---|
| | | | | | | | | | No of Voting Rights Class eg: X | Class eg: Y | Total (A+B+C) | | | No. (a) | As a % of total Shares held(b) | No. (a) | As a % of total Shares held(b) | |
| | | | | | | | | | | | | | | | | | | |
| | Institutions | | | | | | | | | | | | | | | | | |
| (a) | Mutual Fund | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (b) | Venture Capital Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (c) | Alternate Investment Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (d) | Foreign Venture Capital Investors | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (e) | Foreign Portfolio Investor | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (f) | Financial Institutions / Banks | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (g) | Insurance Companies | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (h) | Provident Funds/ Pension Funds | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| (i) | Any Other (Specify) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| | Sub Total (B)(1) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| | Central Government/ State Government(s)/ President of India | | | | | | | | | | | | | | | | | |
| 2 | Sub Total (B)(2) | | 0 | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0.0000 | 0 | 0 |
| 3 | Non-Institutions | | | | | | | | | | | | | | | | | |
| (a) | Individuals | | 0 | 0 | 0 | 0 | 0 | | | | | | | | | | | |
| | i. Individual shareholders holding nominal share capital up to Rs. 2 lakhs. | | 736 | 385270 | 0 | 0 | 385270 | 97.87 | 385270 | 0 | 385270 | 97.87 | 0 | 0 | 0 | 0 | 0 | 0 |
| | SHAILESH A. SHAH | AJAPSS108C | 1 | 6910 | 0 | 0 | 6910 | 1.76 | 6910 | 0 | 6910 | 1.76 | 0 | 0 | 0 | 0 | 0 | 0 |
| | ARVIND S.SHAH | AVEPS1788D | 1 | 10750 | 0 | 0 | 10750 | 2.73 | 10750 | 0 | 10750 | 2.73 | 0 | 0 | 0 | 0 | 0 | 0 |
| | ii. Individual shareholders holding nominal share capital in excess of Rs. 2 lakhs. | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (b) | NBFCs registered with RBI | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Trust Employee | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (d) | Overseas Depositories(holding DRs) (balancing figure) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| (c) | Any Other (Specify) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | IEPF | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Hindu Undivided Family | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Non Resident Indians (Non Repat) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Non Resident Indians (Repatriation) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Body Corp-Ltd Liability Partnership | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Clearing Member | | 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 |
| | Sub Total (B)(3) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| | Total Public Shareholding (B) = (B)(1)+(B)(2)+(B)(3) | | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |


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.

Complex Trading Co. Ltd.

 Director

Complex Trading Co Ltd

Table IV - Statement showing shareholding pattern of the Non Promoter- Non Public shareholder

| Category & Name of the shareholders | PAN | Nos. of sharehold-ers | No. of fully paid up equity shares held (IV) | Partly paid-up equity shares held (V) | No. of shares underlying Depository Receipts (VI) | Shareholding % calculated as per SCRR, 1957 As a % of (A+B+C2) | Number of Voting Rights held in each class of securities | | | Shareholding, as a % assuming full conversion of convertible securities (including securities held) (X) | Number of Locked in shares | | Number of Shares pledged or otherwise encumbered | | Number of equity shares held in dematerialised form (XIV) |
|--|-----|-----------------------|--|---------------------------------------|---|--|--|-------------|-----------|---|----------------------------|--------------------------------|--|--------------------------------|---|
| | | | | | | | No of Voting Rights Class eg: X | Class eg: Y | Total (X) | | No. (a) | As a % of total Shares held(b) | No. (a) | As a % of total Shares held(b) | |
| | | | | | | | | | | | | | | | |
| 1 Custodian/DR Holder | | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0 | |
| Employee Benefit Trust (under SEBI (Share based Employee Benefit) Regulations, 2014) | | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0 | |
| 2 Total Non-Promoter- Non Public Shareholding (C)= (C1)+(C)2 | | 0 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0.0000 | 0 | 0 | 0 | 0 | |

Complex Trading Co Ltd
Director


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

| Sr. No. | Details of the SBO | | | | Details of the registered owner | | | | Details of holding/ exercise of right of the SBO in the | | | | | Date of creation / acquisition of significant beneficial interest | |
|---------|--------------------|-----|--|---|---------------------------------|-----|--|-------------|---|-----------------------|---------------|--|---------------------|---|-----------------------------------|
| | Name | PAN | Passport No. in case of a foreign national | Nationality (Applicable in case of Any other is selected) | Name | PAN | Passport No. in case of a foreign national | Nationality | Nationality (Applicable in case of Any other is selected) | Whether by virtue of: | | | | | |
| | | | | | | | | | | Shares | Voting rights | Rights on dividend or any other distribution | Exercise of control | | Exercise of significant influence |
| | NIL | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | |


 Complex Trading Co Ltd
 Director