



September 16, 2024

To
Corporate Relationship Department
BSE Limited,
P.J Towers, Dalal Street,
Mumbai – 400 001
Scrip Code: 531126

Sub: Reply to clarification sought by the exchange on the shareholding pattern submitted by the Company under Regulation 31(1)(c) of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements), Regulations, 2015 (“Listing Regulations”).

Dear Sir/Ma’am,

This is with reference to the above captioned subject, wherein your good office has sought certain clarifications regarding the shareholding pattern submitted by Virtualsoft Systems Limited (‘VSL’/‘the Company’) under regulation 31(1)(c) of the Listing Regulations.

In this regard, we take the opportunity to provide our seriatim submissions as follows:

Query: There is Quarter to Quarter Change in count of promoter of the Company compared to previous period/quarter shareholding pattern.

Explanation: As mentioned in the previous reply filed with your good office dated September 7, 2024, the Company has acquired 98% equity shares of Empyrean Spirits Private Limited (‘ESPL’), in consideration of which it has issued and allotted its equity shares to the shareholders of ESPL on 22nd August, 2024.

Pursuant to the aforesaid allotment, certain allottees (listed below) have been allotted equity shares under the “Promoter and Promoter Group category” in the filed shareholding pattern, as they qualified as part of “Promoter Group” as defined under SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018. As a result, the number of Promoters has been increased from 5 in the previous period/quarter to 9 in the current shareholding pattern filed by the Company.

VIRTUALSOFT SYSTEMS LIMITED

(CIN No.: L72200DL1992PLC047931)

Regd. Office: S-101, Panchsheel Park, New Delhi- 110 017 India

Corp. Office: 59, Okhla Industrial Estate, Phase-III, New Delhi - 110 020

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New allottees qualifying as ‘Promoter Group’ categorized under the “Promoter and Promoter Group category” are as follows –

1. Prabhudev V Kulkarni
2. Samrath Bedi
3. Sagarika Tandan
4. Ritu Tandan

We hope that the aforementioned clarification will suffice the requirements of your office.

For and on behalf of

FOR VIRTUALSOFT SYSTEMS LIMITED

Mukta
Mukta Ahuja

Company Secretary & Compliance Officer



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