

FORM NO. MGT-7

[Pursuant to sub-Section(1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11of the Companies (Management and Administration) Rules, 2014]



सत्यमेव जयते

Annual Return (other than OPCs and Small Companies)

Form language English Hindi

Refer the instruction kit for filing the form.

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (CIN) of the company

U24219GJ1995PTC028519

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AAECS0891E

(ii) (a) Name of the company

SUN PETROCHEMICALS PRIVATE

(b) Registered office address

R K CENTRE 4TH FLOORFATEHGUNJ
MAIN ROAD
BARODA
Vadodara
Gujarat
390002

(c) *e-mail ID of the company

secretarial@sunpetro.com

(d) *Telephone number with STD code

02242181111

(e) Website

www.sunpetro.com

(iii) Date of Incorporation

21/12/1995

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Private Company	Company limited by shares	Indian Non-Government company

(v) Whether company is having share capital

Yes

No

(vi) *Whether shares listed on recognized Stock Exchange(s)

Yes

No

(vii) *Financial year From date (DD/MM/YYYY) To date (DD/MM/YYYY)

(viii) *Whether Annual general meeting (AGM) held Yes No

(a) If yes, date of AGM

(b) Due date of AGM

(c) Whether any extension for AGM granted Yes No

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*Number of business activities

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	B	Mining and quarrying	B2	Extraction of Crude Petroleum & Natural gas	98.5

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

*No. of Companies for which information is to be given

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	SHANGHVI FINANCE PRIVATE L	U65910MH1989PTC053111	Holding	67.42

IV. SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

(i) *SHARE CAPITAL

(a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	29,999,000	9,167,000	9,167,000	9,167,000
Total amount of equity shares (in Rupees)	299,990,000	91,670,000	91,670,000	91,670,000

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity Shares				
Number of equity shares	29,999,000	9,167,000	9,167,000	9,167,000

Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	299,990,000	91,670,000	91,670,000	91,670,000

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	100	0	0	0
Total amount of preference shares (in rupees)	10,000	0	0	0

Number of classes

1

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
12% Redeemable Non-cumulative Preference Share				
Number of preference shares	100	0	0	0
Nominal value per share (in rupees)	100	100	100	100
Total amount of preference shares (in rupees)	10,000	0	0	0

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

(d) Break-up of paid-up share capital

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
Equity shares						
At the beginning of the year	9,167,000	0	9167000	91,670,000	91,670,000	
Increase during the year	0	0	0	0	0	0
i. Public Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0

viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify <input type="text"/>						
Decrease during the year	0	0	0	0	0	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify <input type="text"/>						
At the end of the year	9,167,000	0	9167000	91,670,000	91,670,000	

Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify <input type="text"/>						
Decrease during the year	0	0	0	0	0	0
i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify <input type="text"/>						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company

(ii) Details of stock split/consolidation during the year (for each class of shares)

Class of shares		(i)	(ii)	(iii)
Before split / Consolidation	Number of shares			
	Face value per share			
After split / Consolidation	Number of shares			
	Face value per share			

(iii) Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company) *

Nil

[Details being provided in a CD/Digital Media]

Yes

No

Not Applicable

Separate sheet attached for details of transfers

Yes

No

Note: In case list of transfer exceeds 10, option for submission as a separate sheet attachment or submission in a CD/Digital Media may be shown.

Date of the previous annual general meeting		<input type="text"/>	
Date of registration of transfer (Date Month Year)		<input type="text"/>	
Type of transfer	<input type="text"/>	1 - Equity, 2 - Preference Shares, 3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
Ledger Folio of Transferor		<input type="text"/>	
Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name
Ledger Folio of Transferee		<input type="text"/>	

Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	<input type="text"/>
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Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
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Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
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Ledger Folio of Transferor	<input type="text"/>
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Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Ledger Folio of Transferee	<input type="text"/>
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Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

(iv) * Debentures (Outstanding as at the end of financial year)

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	4,750	1000000	4,750,000,000
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Total			4,750,000,000

Details of debentures

Class of debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	4,750,000,000	0	4,750,000,000
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

(v) Securities (other than shares and debentures)

0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

V. *Turnover and net worth of the company (as defined in the Companies Act, 2013)

(i) Turnover

13,157,441,000

(ii) Net worth of the Company

8,565,515,000

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	800,000	8.73	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	7,450,000	81.27	0	
10.	Others	0	0	0	
	Total	8,250,000	90	0	0

Total number of shareholders (promoters)

4

(b) *SHARE HOLDING PATTERN - Public/Other than promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	917,000	10	0	
10.	Others	0	0	0	

	Total	917,000	10	0	0
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Total number of shareholders (other than promoters)

2

**Total number of shareholders (Promoters+Public/
Other than promoters)**

6

**VII. *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS
(Details, Promoters, Members (other than promoters), Debenture holders)**

Details	At the beginning of the year	At the end of the year
Promoters	4	4
Members (other than promoters)	2	2
Debenture holders	0	3

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	1	0	1	0	8.73	0
B. Non-Promoter	4	1	4	1	0	0
(i) Non-Independent	4	1	4	1	0	0
(ii) Independent	0	0	0	0	0	0
C. Nominee Directors representing	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0
(v) Others	0	0	0	0	0	0
Total	5	1	5	1	8.73	0

Number of Directors and Key managerial personnel (who is not director) as on the financial year end date

7

(B) (i) *Details of directors and Key managerial personnel as on the closure of financial year

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
Dilip S. Shanghvi	00005588	Managing Director	800,000	
Sudhir Vrundavandas V	00005561	Director	0	
Karishma Aalok Shangh	03546211	Whole-time directo	0	
Jimmi Desai	02623717	Director	0	
Vibha Dilip Shanghvi	05007924	Director	0	
Vidhi Dilip Shanghvi	06497350	Director	0	
Vishal Mehta	AJTPM0931C	CFO	0	

(ii) Particulars of change in director(s) and Key managerial personnel during the year

2

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation	Nature of change (Appointment/ Change in designation/ Cessation)
Tushar Pawar	APLPP3582J	Company Secretar	17/03/2023	Cessation
Vishal Mehta	AJTPM0931C	CFO	21/07/2022	Appointment

IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS**A. MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS**

Number of meetings held

2

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	29/09/2022	6	3	81.27
Extra Ordinary General Mee	27/08/2022	6	3	81.27

B. BOARD MEETINGS

*Number of meetings held

10

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	27/04/2022	6	6	100
2	30/05/2022	6	6	100
3	20/07/2022	6	6	100
4	04/08/2022	6	5	83.33
5	27/08/2022	6	5	83.33
6	16/09/2022	6	3	50
7	20/09/2022	6	3	50
8	14/11/2022	6	3	50
9	23/01/2023	6	4	66.67
10	14/02/2023	6	5	83.33

C. COMMITTEE MEETINGS

Number of meetings held

1

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	CSR Committee	02/09/2022	2	2	100

D. *ATTENDANCE OF DIRECTORS

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	17/08/2023
								(Y/N/NA)
1	Dilip S. Shang	10	7	70	0	0	0	Yes
2	Sudhir Vrunda	10	9	90	0	0	0	No
3	Karishma Aalc	10	10	100	0	0	0	Yes
4	Jimmi Desai	10	9	90	1	1	100	Yes

5	Vibha Dilip Sh	10	7	70	1	1	100	No
6	Vidhi Dilip Sha	10	4	40	0	0	0	Yes

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

2

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Dilip S. Shanghvi	Managing Director	130,892,935	0	0	79,920,190	210,813,125
2	Karishma Aalok Sha	Whole-time Director	64,513,651	0	0	44,418,813	108,932,464
	Total		195,406,586	0	0	124,339,003	319,745,589

Number of CEO, CFO and Company secretary whose remuneration details to be entered

2

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Tushar Pawar	Company Secretary	1,424,188	0	0	0	1,424,188
2	Vishal Mehta	CFO	5,949,844	0	0	0	5,949,844
	Total		7,374,032	0	0	0	7,374,032

Number of other directors whose remuneration details to be entered

3

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Vibha Dilip Shanghvi	Director	68,084,204	0	0	41,597,760	109,681,964
2	Vidhi Dilip Shanghvi	Director	46,238,172	0	0	28,268,514	74,506,686
3	Jimmi Desai	Director	12,395,522	0	0	185,424	12,580,946
	Total		126,717,898	0	0	70,051,698	196,769,596

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

* A. Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year Yes No

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

(A) DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/DIRECTORS /OFFICERS Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status

(B) DETAILS OF COMPOUNDING OF OFFENCES Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in Rupees)

XIII. Whether complete list of shareholders, debenture holders has been enclosed as an attachment

Yes No

XIV. COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

Name

Veenit Pal

Whether associate or fellow

Associate Fellow

Certificate of practice number

13149

I/We certify that:

(a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.

(b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.

(c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of the incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.

(d) Where the annual return discloses the fact that the number of members, (except in case of a one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

Declaration

I am Authorised by the Board of Directors of the company vide resolution no. ...

17

dated

26/04/2023

(DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

1. Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
2. All the required attachments have been completely and legibly attached to this form.

Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.

To be digitally signed by

Director



DIN of the director

02623717

To be digitally signed by



Company Secretary

Company secretary in practice

Membership number

41132

Certificate of practice number

Attachments

1. List of share holders, debenture holders
2. Approval letter for extension of AGM;
3. Copy of MGT-8;
4. Optional Attachment(s), if any

List of attachments

Attach

Attach

Attach

Attach

Sun Petro_List of shareholders_31 03 2023.pdf
Sun Petro_List of debentureholders_31 03 2023.pdf
MGT-8_Sun Petro_31 03 2023.pdf

Remove attachment

Modify

Check Form

Prescrutiny

Submit

This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company

Sun Petrochemicals Private Limited

8th Floor, ATL Corporate Park, Saki Vihar Road,
Powai, Mumbai -400 072, Maharashtra, INDIA.
Tel: (022)-69325300, Fax: +91 22 6932 5300, Ext: 5333
Website: www.sunpetro.com
CIN: U24219GJ1995PTC028519



LIST OF SHAREHOLDERS AS ON MARCH 31, 2023				
Sl. No.	Name of Shareholder	No. of shares held	Amount per share (in Rs.)	% of shareholding
1.	Dilip S. Shanghvi	8,00,000	10	8.73%
2.	Rampant Realty Private Limited	5,50,000	10	6.00%
3.	Unimed Investments Limited	4,70,000	10	5.13%
4.	Aditya Medisales Limited	8,00,000	10	8.73%
5.	Khyati Financial Services Private Limited	3,67,000	10	4.00%
6.	Shanghvi Finance Private Limited	61,80,000	10	67.42%
TOTAL		91,67,000		100%

For **SUN PETROCHEMICALS PRIVATE LIMITED**

A handwritten signature in blue ink, appearing to read "Nidhi Vora", is written over a horizontal line.

NIDHI VORA
COMPANY SECRETARY
M. NO. A41132

Date: September 25, 2023
Place: Mumbai

Sun Petrochemicals Private Limited

8th Floor, ATL Corporate Park, Saki Vihar Road,
Powai, Mumbai -400 072, Maharashtra, INDIA.
Tel: (022)-69325300, Fax: +91 22 6932 5300, Ext: 5333
Website: www.sunpetro.com
CIN: U24219GJ1995PTC028519



LIST OF DEBENTUREHOLDERS AS ON MARCH 31, 2023				
Sl. No.	Name of Debenture Holder	No. of Debentures held	Amount per debenture (in Rs.)	% of holding
1.	Kotak Mahindra Bank Limited	3,750	10,00,000	78.94%
2.	Aditya Birla Sun Life Trustee Private Limited A/C Aditya Birla Sun Life Low Duration Fund	500	10,00,000	10.53%
3.	Aditya Birla Sun Life Trustee Private Limited A/C Aditya Birla Sun Life Savings Fund	500	10,00,000	10.53%
TOTAL		4,750		100%

For **SUN PETROCHEMICALS PRIVATE LIMITED**

A handwritten signature in blue ink, appearing to read "Nidhi Vora", is written over a horizontal line.

NIDHI VORA
COMPANY SECRETARY
M. NO. A41132

Date: September 25, 2023
Place: Mumbai

Form No. MGT-8

[Pursuant to section 92(2) of the Companies Act, 2013 and rule 11(2) of Companies (Management and Administration) Rules, 2014]

CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

I have examined the registers, records and books and papers of **Sun Petrochemicals Private Limited (CIN U24219GJ1995PTC028519)** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on 31st March, 2023. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the company, its officers and agents, I certify that:

- A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. During the aforesaid financial year the Company has complied with provisions of the Companies Act, 2013 & Rules made there under in respect of:
 1. Its status is **ACTIVE** under the Companies Act, 2013 ;
 2. Maintenance of registers/records as per the provisions and the rules made there under and making all entries therein have been duly recorded within the time prescribed therefore;
 3. Filing of forms and returns as stated in the annual return, with the Registrar of Companies are within /beyond the prescribed time under the Companies Act, 2013 and the rules made there under. However, no forms or returns were required to be filed with Regional Director, Central Government, the Tribunal, Court or other authorities;
 4. Calling/ convening/ holding meetings of Board of Directors or its committees and the meetings of the members of the company was on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
 5. Closure of Register of Members/ security holders, as the case may be-NOT APPLICABLE;
 6. No advances/loans to its directors and/or persons or firms or Companies have been made as referred in Section 185 of the companies Act, 2013;
 7. Contracts/arrangements with related parties which is on arm length basis and ordinary course of business have been entered as specified in Section 188 of the Companies Act 2013;
 8. The Company issued Listed, Rated, Unsecured, Redeemable, Non-Convertible Debentures aggregating upto Rs. 475,00,000.00 (Indian Rupees Four Hundred Seventy Five Crores Only on duly convened Board Meeting dated 16th September, 2022 and form PAS-3 as well as other relevant form filed with MCA Portal. Further there was no issue or allotment or transfer or transmission or buy-back of securities/ redemption of preference shares / alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
 9. Keeping in abeyance the rights to dividend, rights shares and bonus shares no pending registration of transfer of shares in compliance with the provisions of the Companies Act 2013;

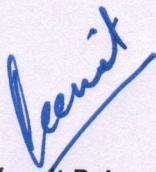


Cont...P.2

10. It has not paid/declared any dividend. Hence, there is no amount required to be transferred by the company to the Investor Education and protection Fund in accordance with Section 125 of the Companies Act, 2013;
11. Signing of audited financial statement was as per the provisions of Section 134 of the Companies Act, 2013 and report of directors is as per sub - Sections (3), (4) and (5) thereof;
12. Constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them as per the provisions the Companies Act, 2013;
13. Appointment/ reappointment/ filling up casual vacancies of auditors were as per the provisions of Section 139 of the Companies Act, 2013 ;
14. No such approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Companies Act, 2013 ;
15. During the year under review, the Company has neither invited nor accepted any deposits from public under Section 73 to 76 of the Companies Act, 2013 read with Companies (Acceptance of Deposits) Rules 2014 and under the guidelines issued by RBI;
16. the Company has complied with the provisions of section 180 of the Companies Act, 2013 with respect to Borrowings from Banks and creation/Modification/ Satisfaction of charges in that respect, whichever applicable. The Company has not accepted any loan is taken from members, Directors, public financial institutions and others during the financial year ended 31st March, 2023;
17. The company has provided inter corporate loan to other companies as per the provision of Section 186 of the Companies Act, 2013. The company has not given any investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of Section 186 of the Companies Act, 2013;
18. No alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

For Veemit Pal & Associates

Company Secretaries



Veemit Pal
(Proprietor)
C.P. No. : 13149
ACS : 25565



Place : Mumbai
Date : 05.10.2023

UDIN : A025565E001189420
Peer Review No. 1433/2021