

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

L27101HR1994PLC092205

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AAACK7155M

(ii) (a) Name of the company

KAMDHENU LIMITED

(b) Registered office address

2nd Floor, Tower-A, Building No. 9,
DLF Cyber City, Phase-III,
Gurgaon
Gurgaon
Haryana
122002



(c) *e-mail ID of the company

cs@kamdhenulimited.com

(d) *Telephone number with STD code

01244604500

(e) Website

www.kamdhenulimited.com

(iii) Date of Incorporation

12/09/1994

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Public 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

(a) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	National Stock Exchange of India Limited (NSE)	1,024
2	BSE Limited	1

(b) CIN of the Registrar and Transfer Agent

U72400TG2017PLC117649

Pre-fill

Name of the Registrar and Transfer Agent

KFIN TECHNOLOGIES LIMITED

Registered office address of the Registrar and Transfer Agents

Selenium, Tower B, Plot No- 31 & 32,
Financial District, Nanakramguda, Serilingampally

(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

(f) Specify the reasons for not holding the same

AGM is scheduled to be held on 28/07/2022.

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	C	Manufacturing	C7	Metal and metal products	71.28
2	C	Manufacturing	C6	Chemical and chemical products, pharmaceuticals, medicinal chemical and	28.72

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	KAMDHENU VENTURES LIMITE +	U51909HR2019PLC089207	Subsidiary	100
2	KAMDHENU COLOUR AND CO. +	U36990HR2019PLC089197	Subsidiary	100
3	KAMDHENU JEEVANDHARA FC +	U80900HR2019NPL083557	Subsidiary	100

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	30,000,000	26,935,500	26,935,500	26,935,500
Total amount of equity shares (in Rupees)	300,000,000	269,355,000	269,355,000	269,355,000

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity Shares of Rs. 10 each				
Number of equity shares	30,000,000	26,935,500	26,935,500	26,935,500
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	300,000,000	269,355,000	269,355,000	269,355,000

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	11,500,000	0	0	0
Total amount of preference shares (in rupees)	115,000,000	0	0	0

Number of classes

1

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
9% Redeemable Preference Shares of Rs. 10 each +				
Number of preference shares	11,500,000	0	0	0
Nominal value per share (in rupees)	10	10	10	10
Total amount of preference shares (in rupees)	115,000,000	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	232	26,935,268	26935500	269,355,000	269,355,000	
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						
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				0	0	
At the end of the year	232	26,935,268	26935500	269,355,000	269,355,000	
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						
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						
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"/>
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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

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			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			
Transferee's Name			
	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	0	0	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Total			0

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	0	0	0
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

8,407,562,087

(ii) Net worth of the Company

2,181,354,521

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	9,511,742	35.31	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)	7,804,145	28.97	0	
10.	Others	0	0	0	
	Total	17,315,887	64.28	0	0

Total number of shareholders (promoters)

22

(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	7,840,630	29.11	0	
	(ii) Non-resident Indian (NRI)	69,093	0.26	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	2,000	0.01	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	88,000	0.33	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	1,500,163	5.57	0	
10.	Others Foreign Portfolio Investors- #	119,727	0.44	0	
	Total	9,619,613	35.72	0	0

Total number of shareholders (other than promoters)

15,224

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

15,246

**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	22	22
Members (other than promoters)	12,942	15,224
Debenture holders	0	0

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	4	0	4	0	17	0
B. Non-Promoter	0	4	0	4	0	0
(i) Non-Independent	0	0	0	0	0	0
(ii) Independent	0	4	0	4	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	4	4	4	4	17	0

Number of Directors and Key managerial personnel (who is not director) as on the financial year end date 10

(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)
SATISH KUMAR AGARWAL	00005981	Managing Director	1,281,842	
SUNIL KUMAR AGARWAL	00005973	Whole-time director	1,545,292	
SAURABH AGARWAL	00005970	Whole-time director	826,500	
SACHIN AGARWAL	01188710	Whole-time director	923,719	
RAMESH CHAND SURJAN	00089854	Director	0	
RAMESH CHANDRA JAIN	00038529	Director	0	
MADHUSUDAN AGARWAL	00338537	Director	0	

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
NISHAL JAIN	06934656	Director	0	31/05/2022
HARISH KUMAR AGARWAL	ABQPA6821J	CFO	75,000	
KHEM CHAND	AJVPC8453H	Company Secretary	0	

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

4

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)
ASHISH KAPIL	ASAPK4324R	Company Secretary	03/04/2021	Cessation
KHEM CHAND	AJVPC8453H	Company Secretary	09/08/2021	Appointment
MAHENDRA KUMAR DIXIT	00319034	Director	04/05/2021	Cessation
MADHUSUDAN AGARWAL	00338537	Director	22/05/2021	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

5

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
NCLT Convened Meeting of	25/09/2021	15,756	95	64.84
NCLT Convened Meeting of	25/09/2021	4	2	99
NCLT Convened Meeting of	25/09/2021	712	326	81.37
Annual General Meeting	27/09/2021	15,638	99	55.19
Extra-Ordinary General Meeting	10/03/2022	14,373	64	63.32

B. BOARD MEETINGS

*Number of meetings held

4

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	21/06/2021	8	8	100
2	09/08/2021	8	7	87.5
3	10/11/2021	8	8	100
4	02/02/2022	8	8	100

C. COMMITTEE MEETINGS

Number of meetings held

14

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	Audit Committee	21/06/2021	4	4	100
2	Audit Committee	09/08/2021	4	3	75
3	Audit Committee	10/11/2021	4	4	100
4	Audit Committee	02/02/2022	4	4	100
5	Stakeholder R	21/06/2021	3	3	100
6	Stakeholder R	09/08/2021	3	2	66.67
7	Stakeholder R	10/11/2021	3	3	100
8	Stakeholder R	02/02/2022	3	3	100
9	Nomination an	21/06/2021	3	3	100
10	Nomination an	09/08/2021	3	2	66.67

D. *ATTENDANCE OF DIRECTORS

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on (Y/N/NA)
		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	
1	SATISH KUMAR	4	4	100	4	4	100	
2	SUNIL KUMAR	4	4	100	8	8	100	

3	SAURABH AG	4	4	100	4	4	100	
4	SACHIN AGA	4	4	100	0	0	0	
5	RAMESH CHA	4	3	75	12	9	75	
6	RAMESH CHA	4	4	100	8	8	100	
7	MADHUSUDA	4	4	100	6	6	100	
8	NISHAL JAIN	4	4	100	8	8	100	

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

4

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	SATISH KUMAR AGARWAL	Chairman & Managing Director	22,879,200	0	0	0	22,879,200
2	SUNIL KUMAR AGARWAL	Whole-time Director	22,579,200	0	0	0	22,579,200
3	SAURABH AGARWAL	Whole-time Director	22,279,200	0	0	0	22,279,200
4	SACHIN AGARWAL	Whole-time Director	22,279,200	0	0	0	22,279,200
	Total		90,016,800	0	0	0	90,016,800

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

3

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Harish Kumar Agarwal	CFO	4,012,968	0	0	0	4,012,968
2	Khem Chand	CS	774,000	0	0	0	774,000
3	Ashish Kapil	CS	18,000				18,000
	Total		4,804,968	0	0	0	4,804,968

Number of other directors whose remuneration details to be entered

4

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Ramesh Chand Sur	Independent Director	0	0	0	450,000	450,000
2	Ramesh Chandra J	Independent Director	0	0	0	540,000	540,000
3	Madhusudan Agarw	Independent Director	0	0	0	520,000	520,000

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
4	Nishal Jain	Independent Dir +	0	0	0	380,000	380,000
	Total		0	0	0	1,890,000	1,890,000

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

(In case of 'No', submit the details separately through the method specified in instruction kit)

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

Shashikant Tiwari

Whether associate or fellow

Associate Fellow

Certificate of practice number

11919

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.

Declaration

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

(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

To be digitally signed by

- Company Secretary
- Company secretary in practice

Membership number

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

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

(Continued)

COMMITTEE MEETINGS HELD DURING THE FINANCIAL YEAR 2021-22

Sr 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
11	Corporate Social Responsibility Committee	21/06/2022	3	3	100
12	Corporate Social Responsibility Committee	02/02/2022	3	3	100
13	Risk Management Committee	10/11/2021	6	6	100
14	Risk Management Committee	02/02/2022	6	6	100
15	Management Committee	05/04/2021	3	3	100
16	Management Committee	26/06/2021	3	3	100
17	Management Committee	29/07/2021	3	3	100
18	Management Committee	11/08/2021	3	3	100
19	Management Committee	02/09/2021	3	3	100
20	Management Committee	25/10/2021	3	3	100
21	Management Committee	19/02/2022	3	3	100
22	Management Committee	10/03/2022	3	3	100

FOR KAMDHENU LIMITED

**KHEM CHAND
COMPANY SECRETARY & COMPLIANCE OFFICER
M. NO.: F10065
ADDRESS: H.NO. 1026/A, SHIV COLONY,
OLD FARIDABAD – 121002, HARYANA**

Draft 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

We have examined the registers, records and books and papers of Kamdhenu Limited (**"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 March 31, 2022 (**"Period"**). In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the company, its officers and agents, we 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 Act & Rules made there under in respect of:
 1. its status under the Act;
 2. maintenance of registers/ records & making entries therein within the time prescribed therefor;
 3. filing of forms and returns ~~as stated in the annual return~~, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/ beyond the prescribed time;

During the Period under review, the Company was not required to file any forms and returns to the Regional Director, Central Government, Tribunal, Court or other authorities except to Investor Education and Protection Fund Authority.

4. Calling/ convening/ holding meetings of Board of Directors or its committees, ~~if any~~, and the meetings of the members of the Company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/ registers maintained for the purpose and the same have been signed;

During the Period under review, the Company has not passed any resolution by postal ballot.

5. closure of Register of Members / Security holder as the case may be;

Since the Company has not issued any other security other than the shares, the Company was not required to close Register of other security holders during the period under review.

6. advances/ loans to its Directors and/ or persons or firms or companies referred in Section 185 of the Act;

During the period under review, the Company has not made any advances/ loans to its Directors and/ or persons or firms or companies referred in Section 185 of the Act.

7. contracts/ arrangements with related parties as specified in Section 188 of the Act;

During the Period under review, the Company has entered into transactions with related parties pursuant to Section 2(76) read with Section 188 of the Act in the ordinary course of business and at arm's length basis; therefore, provisions of Section 188 of the Act were not attracted.

- a. issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;

During the Period under review, the Company has not made any-

- issue or allotment of securities;
- transfer or transmission of securities or buy back of securities;
- redemption of preference shares or debentures;
- reduction of share capital;
- conversion of shares/ securities and
- issue of certificates in all instances.

8. keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act;

During the Period under review, the Company was not required to keep in abeyance the rights to dividend, right shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act.

9. declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;

During the Period under review, the Company was not required to transfer unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act.

10. signing of audited Financial Statement as per the provisions of Section 134 of the Act and report of Directors is as per Sub-Sections (3), ~~(4)~~ and (5) thereof;

11. constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;

During the period under the review, there was no retirement / filing up of casual vacancies of the Directors and Key Managerial Personnel.

12. appointment/ re-appointment/ filling up casual vacancies of auditors as per the provisions of Section 139 of the Act;

During the Period under review, the Company has not made any appointment/ re-appointment or filling up casual vacancies of auditors as per the provisions of section 139 of the Act.

13. approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;

During the Period under review, the Company was not required to take any approvals from the Court under the provisions of the Act.

14. acceptance/ renewal/ repayment of deposits;

During the Period under review, the Company has not made any acceptance/ renewal/ repayment of deposits.

15. borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;

During the Period under review, the Company has not made any borrowings from its directors, members, public financial institutions and others.

16. loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of Section 186 of the Act;

During the Period under review, the Company has not made any loan or investments or given any guarantee or provided any securities to other bodies corporate or persons falling under the provisions of section 186 of the Act.

17. alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

During the Period under review, the Company has not made any alteration of the Articles of Association of the Company.

For Chandrasekaran Associates
Company Secretaries
FRN: P1988DE002500
Peer Review Certificate No.: 1428/2021

Shashikant Tiwari
(Partner)
Membership No. F 11919
Certificate of Practice No. 13050

Date:
Place: Delhi

UDIN:

Note:- Due to restricted movement amid COVID-19 pandemic, we are issuing this report after examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are the true and correct. We are not commenting on the Statutory Compliances whose due dates are extended by Regulators from time to time due to COVID-19 or still there is time line to comply with such compliances.