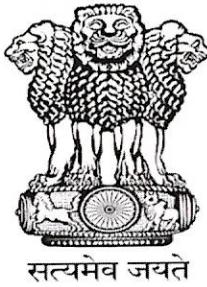


# FORM NO. MGT-7

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



# Annual Return (other than OPCs and Small Companies)

211

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

U29190PN2021GOI203505

Pre-fill

Global Location Number (GLN) of the company

Permanent Account Number (PAN) of the company

AAOCM8781H

(ii) (a) Name of the company

MUNITIONS INDIA LIMITED

(b) Registered office address

C/o Ammunition Factory Khadki Khadki NA  
Pune  
Pune  
Maharashtra  
411003

(c) \*e-mail ID of the company

mil-pune@munitionsindia.in

(d) \*Telephone number with STD code

02067080424

(e) Website

<https://munitionsindia.in>

(ii) Date of Incorporation

17/08/2021

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Public Company	Company limited by shares	Union Government Company

(v) Whether company is having share capital

Yes  No

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

Yes  No

(b) CIN of the Registrar and Transfer Agent

Pre-fill

Name of the Registrar and Transfer Agent

Registered office address of the Registrar and Transfer Agents

(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

(d) If yes, provide the Service Request Number (SRN) of the application form filed for extension

Pre-fill

(e) Extended due date of AGM after grant of extension

## 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	C13	Other manufacturing including jewellery, musical instruments, medical instruments, .....	93.76

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

No. of Companies for which information is to be given

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1				

## 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	42,000,000,000	33,737,660,000	33,737,660,000	33,737,660,000
Total amount of equity shares (in Rupees)	420,000,000,000	337,376,600,000	337,376,600,000	337,376,600,000

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of equity shares	42,000,000,000	33,737,660,000	33,737,660,000	33,737,660,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	420,000,000,000	337,376,600,000	337,376,600,000	337,376,600,000

## (b) Preference share capital

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

Number of classes

0

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)	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
<b>Equity shares</b>	Physical	DEMAT	Total			
<b>At the beginning of the year</b>	1,232,310,0	0	1232310000	12,323,100	12,323,100	

<b>Increase during the year</b>	32,505,350,	0	3250535000	325,053,500	325,053,500	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	32,505,350,	0	3250535000	325,053,500	325,053,500	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						
<b>Decrease during the year</b>	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						
<b>At the end of the year</b>	33,737,660,	0	3373766000	337,376,600	337,376,600	

<b>Preference shares</b>						
<b>At the beginning of the year</b>	0	0	0	0	0	
<b>Increase during the year</b>	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						
<b>Decrease during the year</b>	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						
<b>At the end of the year</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	

ISIN of the equity shares of the company

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

0

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			
Date of registration of transfer (Date Month Year)	08/08/2022		
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	1	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		6
Transferor's Name	Chandra	Subhash
	Surname	middle name
Ledger Folio of Transferee		8
Transferee's Name	Sharan	Kumar
	Surname	middle name
Date of registration of transfer (Date Month Year)		23/02/2023
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
Number of Shares/ Debentures/ Units Transferred	1	Amount per Share/ Debenture/Unit (in Rs.) 10
Ledger Folio of Transferor		3
Transferor's Name	Sharma	Gaurav
	Surname	middle name
Ledger Folio of Transferee		9
Transferee's Name	Nagarkoti	Gokul
	Surname	middle name
Date of registration of transfer (Date Month Year)		23/02/2023
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
Number of Shares/ Debentures/ Units Transferred	1	Amount per Share/ Debenture/Unit (in Rs.) 10

Ledger Folio of Transferor		4	
Transferor's Name	Bedi	Singh	Saranjit
	Surname	middle name	first name
Ledger Folio of Transferee		10	
Transferee's Name			Bhutia
	Surname	middle name	first name
Date of registration of transfer (Date Month Year)			
Type of transfer		1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
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

Particulars	Number of units	Nominal value per unit	Total value
<b>Total</b>			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
<b>Non-convertible debentures</b>	0	0	0	0
<b>Partly convertible debentures</b>	0	0	0	0
<b>Fully convertible debentures</b>	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
<b>Total</b>					

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

46,521,800,000

**(ii) Net worth of the Company**

74,806,200,000

**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	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	33,737,660,000	100	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)	0	0	0	
10.	Others	0	0	0	
	<b>Total</b>	33,737,660,000	100	0	0

Total number of shareholders (promoters)

7

**(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)	0	0	0	
10.	Others	0	0	0	
	<b>Total</b>	0	0	0	0

**Total number of shareholders (other than promoters)**

0

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

7

**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	7	7
Members (other than promoters)	0	0
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
<b>A. Promoter</b>	4	1	4	1	0	100
<b>B. Non-Promoter</b>	0	0	0	0	0	0
(i) Non-Independent	0	0	0	0	0	0
(ii) Independent	0	0	0	0	0	0
<b>C. Nominee Directors representing</b>	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	1	4	1	0	100

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

6

**(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)
Ravi Kant	09283919	Managing Director	0	
Debashish Banerjee	09283921	Director	0	
Sushanta Kumar Rout	09283920	Director	0	30/06/2023
Surendra Prasad Yadav	02267582	Nominee director	33,737,659,994	
Prakash Agarwala	09666613	Director	0	
Paul Joseph Eluvathing	AABPE7932Q	Company Secretar	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)
Vivek Chandra Verma	09311709	Additional director	20/05/2022	Cessation
Prakash Agarwala	09666613	Director	14/06/2022	Appointment
Prakash Agarwala	09666613	CFO	08/08/2022	Appintment
Paul Joseph Eluvathing	AABPE7932Q	Company Secretar	11/07/2022	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

6

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Extra Ordinary General Meeting	18/05/2022	7	6	100
Extra Ordinary General Meeting	15/09/2022	7	5	1
First Annual General Meeting	21/12/2022	7	5	100
Extra Ordinary General Meeting	20/02/2023	7	3	1
Adjourned Extra Ordinary General Meeting	27/02/2023	7	6	1
Adjourned First Annual General Meeting	14/03/2023	7	7	100

#### B. BOARD MEETINGS

Number of meetings held

6

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	17/05/2022	5	5	100
2	08/08/2022	5	4	80
3	03/11/2022	5	4	80
4	22/12/2022	5	3	60
5	27/12/2022	5	3	60
6	23/02/2023	5	5	100

#### C. COMMITTEE MEETINGS

Number of meetings held

2

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	27/01/2023	2	2	100
2	CSR	21/03/2023	2	2	100

#### D. \*ATTENDANCE OF DIRECTORS

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on 20/12/2023 (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	
		6	6	100	0	0	0	Yes
1	Ravi Kant	6	6	100	2	2	100	Yes
2	Debashish Ba	6	6	100	2	2	100	Not Applicable
3	Sushanta Kum	6	4	66.67	2	2	100	Not Applicable
4	Surendra Pras	6	2	33.33	0	0	0	Not Applicable
5	Prakash Agar	5	5	100	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

5

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Ravi Kant	Chairman and MD	4,613,712	0	0	0	4,613,712
2	Debashish Banerjee	Director/HR	4,649,872	0	0	0	4,649,872
3	Sushanta Kumar Roy	Director/Operati	4,629,904	0	0	0	4,629,904
4	Prakash Agarwala	Director/Finance	4,032,414	0	0	0	4,032,414
5	Vivek Chandra Verma	Director/Finance	642,712	0	0	0	642,712
	Total		18,568,614	0	0	0	18,568,614

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

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Paul Joseph Eluvathingal	Company Secretary	736,667	0	0	0	736,667
	Total		736,667	0	0	0	736,667

Number of other directors whose remuneration details to be entered

0

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
	Total						

#### XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

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

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

A. K. Rastogi

Whether associate or fellow

Associate  Fellow

Certificate of practice number

22973

1/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.

197

**Declaration**

I am Authorised by the Board of Directors of the company vide resolution no. .. 2 dated 08/08/2022

(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

09666613

To be digitally signed by



Company Secretary

Company secretary in practice

Membership number

4521

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

Attach  
Attach  
Attach  
Attach

**List of attachments**

List of shareholders.pdf  
Approval letter for extention of AGM.pdf  
Munitiions MGT-8 UDIN.pdf

**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**

196



195

**GOVERNMENT OF INDIA**  
**MINISTRY OF CORPORATE AFFAIRS**

Office of the Registrar of Companies

PCNTDA Green Building, BLOCK A, 1st & 2nd Floor Near Akurdi Railway Station, Akurdi, Maharashtra, India, 411044

DATED : 04-10-2023

IN THE MATTER OF M/S MUNITIONS INDIA LIMITED CIN U29190PN2021GOI203505

AND

IN THE MATTER OF EXTENSION UNDER SECTION 96(1) OF THE COMPANIES ACT, 2013

The Company has closed its accounting year on 30-09-2023 and the Annual general meeting of the company was due to be held on 30-09-2023 as per requirements of section 96 of the Companies Act, 2013. The company has made an application vide SRN F65388399 on 28-09-2023 requesting for an extension of time for the purpose of holding AGM on the following grounds

Extension is granted for a period of 3 months in terms of third proviso of Sec. 96 of the Act.

Keeping in view, the aforesaid circumstances due to which company cannot hold its Annual General Meeting on time, extension 3 months 0 days is considered.

**ORDER**

Under the power vested in the undersigned by virtue of section 96(1) read with second proviso attached thereto extension of 3 months 0 days is hereby granted. However, the company is hereby advised to be careful in future in compliance of the provisions of the Companies Act, 2013.

  
DS Ministry of  
corporate  
affairs 7

Yours faithfully,

MANGESH RAMDAS JADHAV

Registrar of Companies

RoC - Pune

---

Mailing Address as per record available in Registrar of Companies office:

**MUNITIONS INDIA LIMITED**  
C/o Ammunition Factory Khadki Khadki NA, Pune, Pune, Maharashtra,  
India, 411003



**Note:** This letter is to be generated only when the application is approved by RoC office

No. MIL/FIN/e-filling/MGT-7/MCA/2023-24

Date: 09.11.2023

**Sub: List of Shareholders of Munitions India Limited as on 31.03.2023**

\*\*\*\*\*

The list of Shareholders of Munitions India Limited as on 31.03.2023 are as appended below:

Sl. No.	Name of shareholders	No. of shares
1	President of India through Shri Surendra Prasad Yadav, Joint Secretary to the Government of India, Ministry of Defence (Department of Defence Production), New Delhi-110 011	3373,76,59,994
2	Shri. Shersha Shaik Mohiddin, S/o Shri. C.M. Shaik Mohiddin and R/o House No. D-3, Tower-9, Type 5-A, East Kidwai Nagar, South West Delhi, Delhi-110023	1
3	Shri. Abhay Kumar Saran, DS (AS-II), Department of Defence Production, New Delhi-110 011	1
4	Shri. Gokul Nagarkoti, Deputy Secretary (Vigilance), Department of Defence Production, New Delhi-110 011	1
5	Shri. Sharda Prasad, S/o Late Shri. Ghinhoo and R/o 10 C-159, Vasundhara, Ghaziabad, Uttar Pradesh-201012	1
6	Shri. P. T. Bhutia, Director (P), Department of Defence Production, New Delhi-110 011	1
7	Ms. Urmila Rawat, D/o Shri. Ram Singh Rawat and R/o 183, Dwarkadheesh Apartments, Sector-12 Dwarka, New Delhi	1
<b>TOTAL</b>		<b>3373,76,60,000</b>



(E. J. Paul)  
- Company Secretary



## 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 MUNITIONS INDIA LIMITED (CIN: U29190PN2021GOI203505) (here after called as Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on 31<sup>st</sup> March 2023. 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;
  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 if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed subject to following observations-

In the absence of Independent Directors, the Audit Committee, Nomination and Remuneration Committee, and Corporate Social Responsibility Committee as constituted by the Company is not in accordance with the provisions of the Companies Act, 2013 and DPE Guidelines on Corporate Governance for CPSEs.

5. Closure of Register of Members / Security holders, as the case may be (no such instance during the financial year);



6. Advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act (**no such instance during the financial year**);
7. Contracts/arrangements with related parties as specified in section 188 of the Act ;
8. Issue or allotment or transfer or transmission or buy back of securities/ and issue of security certificates in all instances;
9. The Company has not kept in abeyance any shares issued on rights basis for pending registration of transfer of shares in compliance with the provisions of the Act
10. 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 (**no such instance during the financial year**);
11. 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;
12. Constitution/ appointment/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them subject to following observations:

As per Section 149 of the Companies Act 2013 read with Companies (Appointment and Qualification of Directors) Rules, 2014, the Company is required to have at least 2 Independent Directors and one woman Director; however the Company doesn't have any Independent Director and one woman Director on the Board. As such, the composition of the Board of Directors of the company is not in Compliance with provisions of the Companies Act, 2013 and DPE Guidelines on Corporate Governance for CPSEs.

13. Appointment/ reappointment/ of auditors as per the provisions of section 139 of the Act;
14. 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;
15. Acceptance/ renewal/ repayment of deposits (**not applicable as the Company has not accepted any accepted any deposits from the public**);
16. Borrowings from public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;



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

Date: 29-12-2023

Place: Ghaziabad

For A. K. Rastogi & Associates  
Company Secretaries  
ICSI Unique code No S2020UP724400



*Amulya* 29/12/20  
(A.K. RASTOGI)  
PROPRIETOR  
FCS No.: 1748  
CP No.: 22973  
UDIN: F001748E003063631