

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]



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

U15122CT2011PLC000089

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AAQCS8006D

(ii) (a) Name of the company

SARDA DAIRY & FOOD PRODU

(b) Registered office address

VANIYA BHAWAN, 1ST FLOOR, SAI NAGAR, DEVENDRA NAGAR ROAD,
NA
RAIPUR
Raipur
Chattisgarh
492001

(c) *e-mail ID of the company

secretarial@sardadairy.in

(d) *Telephone number with STD code

07712214118

(e) Website

www.sardadairy.in

(iii) Date of Incorporation

30/12/2011

(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

(b) CIN of the Registrar and Transfer Agent

U99999MH1994PTC076534

Pre-fill

Name of the Registrar and Transfer Agent

BIGSHARE SERVICES PRIVATE LIMITED

Registered office address of the Registrar and Transfer Agents

E-3 ANSA INDUSTRIAL ESTATESAKI VIHAR ROAD
SAKINAKA

(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	A	Agriculture, forestry, fishing	A4	Support activities to agriculture and Other Activities including hunting	100

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				

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	75,000,000	64,000,000	64,000,000	64,000,000
Total amount of equity shares (in Rupees)	750,000,000	640,000,000	640,000,000	640,000,000

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
EQUITY SHARES				
Number of equity shares	75,000,000	64,000,000	64,000,000	64,000,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	750,000,000	640,000,000	640,000,000	640,000,000

(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)				

(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
Equity shares	Physical	DEMAT	Total			
At the beginning of the year	576,000	48,424,000	49000000	490,000,000	490,000,000	
Increase during the year	0	15,030,000	15030000	150,000,000	150,000,000	360,000,000
i. Public Issues	0	0	0	0	0	
ii. Rights issue	0	15,000,000	15000000	150,000,000	150,000,000	360,000,000
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 Dematerialisation	0	30,000	30000			
Decrease during the year	30,000	0	30000	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 Dematerialisation	30,000	0	30000			
At the end of the year	546,000	63,454,000	64000000	640,000,000	640,000,000	
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

INE04YZ01018

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

1,365,703,945

(ii) Net worth of the Company

101,260,712

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	896,000	1.4	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)	60,303,000	94.22	0	
10.	Others	0	0	0	
	Total	61,199,000	95.62	0	0

Total number of shareholders (promoters)

11

(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	726,000	1.13	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)	2,075,000	3.24	0	
10.	Others	0	0	0	

	Total	2,801,000	4.37	0	0
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Total number of shareholders (other than promoters)

18

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

29

**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	11	11
Members (other than promoters)	16	18
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	0	2	0	3	0	0.08
B. Non-Promoter	1	2	1	3	0	0
(i) Non-Independent	1	1	1	1	0	0
(ii) Independent	0	1	0	2	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	1	4	1	6	0	0.08

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

9

(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)
PANKAJ SARDA	00008190	Director	0	
SAURABH RATHI	00014178	Director	10,000	
PADAM KUMAR JAIN	00008379	Director	0	01/04/2023
VENKAT RAM	08702568	Director	0	
HEMANT KUMAR TAM	09041840	Whole-time director	0	
GOPAL SHARMA	02151779	Additional director	0	
VIPULA SARDA	02232571	Additional director	39,000	
RAJENDER SINGH	CLWPS5053E	Company Secretary	0	01/04/2023
AMIT BATRA	AXKPB9245P	CFO	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)
GOPAL SHARMA	02151779	Additional director	31/03/2023	APPOINTMENT
VIPULA SARDA	02232571	Additional director	31/03/2023	APPOINTMENT
HEMANT KUMAR TAM	09041840	Whole-time director	01/04/2022	APPOINTMENT
SANJEEV AGRAWAL	06480532	Whole-time director	01/04/2022	CESSATION

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	30/09/2022	29	6	73.49
EXTRA-ORDINARY GENERAL MEETING	03/03/2023	29	6	73.49

B. BOARD MEETINGS

*Number of meetings held

8

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	01/04/2022	4	3	75
2	25/06/2022	5	3	60
3	03/09/2022	5	5	100
4	07/12/2022	5	3	60
5	31/01/2023	5	3	60
6	04/02/2023	5	4	80
7	03/03/2023	5	3	60
8	27/03/2023	5	5	100

C. COMMITTEE MEETINGS

Number of meetings held

4

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 COMM	27/03/2023	2	2	100
2	AUDIT COMM	03/09/2022	2	2	100
3	NOMINATION	01/04/2022	2	2	100
4	NOMINATION	27/03/2023	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	30/09/2023
								(Y/N/NA)
1	PANKAJ SAR	8	4	50	4	4	100	Yes
2	SAURABH RA	8	7	87.5	0	0	0	Yes

3	PADAM KUMAR	8	3	37.5	0	0	0	Not Applicable
4	VENKAT RAM	8	8	100	4	4	100	Yes
5	HEMANT KUMAR	7	7	100	0	0	0	Yes
6	GOPAL SHARMA	0	0	0	0	0	0	Yes
7	VIPULA SARDAR	0	0	0	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

0

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

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	AMIT BATRA	CFO	1,287,034	0	0	0	1,287,034
2	RAJENDER SINGH	COMPANY SEC	580,961	0	0	0	580,961
	Total		1,867,995	0	0	0	1,867,995

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
	Total						

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

As per MGT-8 attached

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

BRAJESH R AGRAWAL

Whether associate or fellow

☐ Associate ☒ Fellow

Certificate of practice number

5649

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. ...

1

dated

10/08/2023

(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

HEMANT
KUMAR
TAMRAKAR
Digitally signed by
HEMANT KUMAR
TAMRAKAR
Date: 2024.01.27
16:36:51 +05'30'

DIN of the director

09041840

To be digitally signed by

SHREOSHI
CHATTERJEE
EE
Digitally signed by
SHREOSHI
CHATTERJEE
Date: 2024.01.27
16:49:14 +05'30'

- ☒ Company Secretary
☐ Company secretary in practice

Membership number

45776

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 Attachement(s), if any

Attach

Attach

Attach

Attach

List of attachments

List of Shareholders-MGT_7.pdf
MGT-8.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

First Name	Middle Name	Last Name	Folio Number	DP ID-Client Id Account Number	Number of Shares held	Class of Shares
NEERAJ		SARDA		IN30021418447584	35,000	Equity share
MANISH	JUGAJKISHORE	SARDA		IN30429584274135	1,67,000	Equity share
KAMAL	KISHORE	SARDA		IN30311612857094	4,53,000	Equity share
VIPULA		SARDA		IN30311612986481	39,000	Equity share
GHANSHYAM		SARDA		IN30429572962703	2,02,000	Equity share
CHHATTISGARH INVESTMENTS LIMITED				IN30021417297842	3,04,63,326	Equity share
SARDA AGRICULTURE & PROPERTIES P LTD				IN30088814740336	1,21,60,000	Equity share
PARVATIYA POWER LIMITED				IN30311612266074	1,27,36,000	Equity share
RISHABH MINING AND TRANSPORT CO PVT LTD				IN30311613152220	3,84,000	Equity share
PREM AGRICULTURE AND PROPERTY PVT LTD				IN30311613347494	6,41,685	Equity share
PRACHI AGRICULTURE AND PROPERTIES PVT LTD				IN30311613451577	39,17,989	Equity share
MAHESH	KUMAR	KHATOR	15		15,000	Equity share
KRITIDA		DAVE	20		26,000	Equity share
MUKTA	BEN	DAVE	21		20,000	Equity share
YOGESH		DAVE	22		40,000	Equity share
YASH		DAVE	25		60,000	Equity share
TEJAL		DAVE	28		10,000	Equity share
CHANDRAKANTA		CHHANGANI		IN30051385565197	30,000	Equity share
C.K		LAKSHMINARAYANAN		IN30302874964404	1,20,000	Equity share
YOGESH DAVE HUF				IN30311610013420	14,000	Equity share
KAMAL	KISHORE	RATHI		IN30311610091722	2,76,000	Equity share
SAURABH		RATHI		IN30311612381709	10,000	Equity share
VINODRAI DAVE HUF				IN30311613257622	10,000	Equity share
RUBY	GURDARSHAN	SAHNI		IN30302897409350	65,000	Equity share
AMIT	KRISHNA	CHHANGANI		IN30429553215648	30,000	Equity share
HEMNIDHI SECURITIES LIMITED			16		15,000	Equity share
RAIPUR INFRASTRUCTURE COMPANY LIMITED			19		3,60,000	Equity share
RAIPUR MEGA FOOD PARK PVT LTD				IN30311614107088	12,00,000	Equity share
FORTUNE COURIERS LTD				1202300000994186	5,00,000	Equity share
					6,40,00,000	



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, books and papers of **M/s. Sarda Dairy & Food Products Limited** (the Company), **CIN: U15122CT2011PLC000089**, 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 by the company, its officers and agents, I certify as under:

- A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. The status of compliance of the Company under various provisions of the Act and rules made there under is as follows:
 1. The Company has generally complied with the provisions of the Act & the rules made there under in relation to its status as Public Limited Company *except*:
 - a. Due to death of one Independent Director on 09/05/2021, the office of an Independent Director had become vacant, which was to be filled within 3 month from the date of said vacancy or the date of next Board meeting of the Company whichever is later as per the provisions of section 149 read with rule 4 of the Companies (Appointment and Qualifications of Directors) Rule 2014. *However, it is observed that, the Company has appointed Mr. Gopal Sharma as an Independent Director on the Board of the Company w.e.f. 31.03.2023. The management has informed that since the Company is carrying on dairy business, it requires certain skill and knowledge and therefore, the Company was in process to find a suitable person, with a profile relevant / suitable to the requirements of the Company, for being appointed as an Independent Director.*



b. *Till the appointment of Mr. Gopal Sharma as an independent director on the Board of the Company, the Constitution of Audit Committee and Nomination & Remuneration Committee were not in accordance with the provisions of section 177 and 178 of the Companies Act, 2013.*

2. The Company has maintained registers, records and made entries therein within the time limit prescribed for it.
3. According to the information provided to me, the Company has filed forms and returns, with the Registrar of Companies and generally complied with provisions of the Act in this regard. As informed to me, the Company was not required to file any form with Regional Director, Central Government, Tribunal, Court or other authorities during the year.
4. The Company has made compliance in respect of calling, convening, holding meetings of Board of Directors and its committees and the meetings of the members of the Company on due dates as stated in the annual return in respect of those meetings, proper notices were given and the proceedings have been properly recorded in the Minutes Book maintained for the purpose and the same have been signed.
5. The Company has not closed its Register of Members during the financial year.
6. As explained and the information provided to me, 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. During the financial year the Company has entered into contracts/arrangements with related parties as specified in section 188 of the Act. As explained and information provided to me, all the transaction entered with related parties were at arm's length and in ordinary course of business.
8. During the period under review, the Company has issued and allotted 1,50,00,000 equity shares on right issue basis on 27/03/2023 and the transfer of shares were made after complying with the necessary provisions of the Act, 2013. Further, according to the information made available to me, there were no instances of transmission, buy back of



securities/ alteration or reduction of share capital/ conversion of shares/ securities.

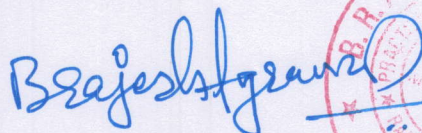
9. According to information made available to me, the Company was not required to keep in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares during the financial year.
10. The Company has not made any declaration or payment of dividend; transfer of unpaid/ unclaimed dividend during the financial year. Further as explained and information provided to me, the Company did not have any other amount required to be deposited to the Investor Education and Protection Fund in accordance with section 125 of the Act;
11. The financial statements of the Company have been signed 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. *Subject to the observation given in point no. 1 (a) in this report*, the Board of the Company has been constituted in compliance with provision of the Act. Further, during the year under review the changes in the constitution of the board have been made after complying with the necessary provisions of the Act.
13. The appointment of auditor was made as per the provisions of section 139 of the Act and there was no casual vacancy arises of auditor during the financial year;
14. According to information made available to me, during the year under review, there were no instances where the Company was required to obtain any approval from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
15. As explained and information provided to me, the Company did not accept any deposit during the financial year;
16. During the financial year, the Company has complied with in respect of borrowings from public financial institutions, banks and others; and creation/modification/satisfaction of charges in that respect, wherever applicable;
17. As explained and information provided to me, during the financial year the Company has not granted any loan and guarantee and security and



not made any investment to other bodies corporate or persons falling under the provisions of section 186 of the Act;

18. As explained and information provided to me, the Company has altered provisions of the Memorandum of Association in respect of alteration of Capital Clause. Further there were no changes in the provisions of the Article of Association during the financial year.

For, B. R. Agrawal & Associates
Practicing Company Secretary

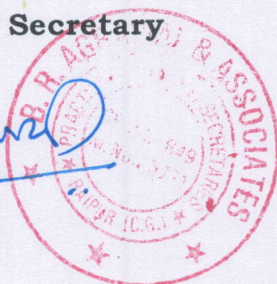


(Brajesh R. Agrawal)

Proprietor

C.P. No. 5649 | M. No. 5771

UDIN: F005771E002726324



Date: 29/11/2023

Place: Raipur