



Nirmal Tiwari & Associates
Company Secretaries

Date: September 8, 2026

To,
GROMA GLOBAL LIMITED
1102A 11th Floor Fortune Terraces, Opp Citi Mall,
New Link Road, Near Lower Oshiwara Metro Station,
Andheri West, Mumbai, Maharashtra, India, 400053

Re: Due Diligence Report of Groma Global Limited.

Dear Sir/Madam,

We are pleased to enclose herewith Due Diligence Report of **Groma Global Limited**.

The information and particulars contained in the said Due Diligence Report are based on the documents and records available on the MCA Portal obtained by taking search on February 05, 2025 on V2 MCA portal and September 8, 2026 on V3 MCA portal, and also contain e-forms filed by the company after obtaining the ROC search on MCA portal and also those forms which were duly filed by the company but not available on MCA portal and were duly provided by the Company.

The search covered particulars including, but not limited to, the present Directors, Shareholding structure, e-Forms filed, and other statutory details of the Company as maintained by the Office of the Registrar of Companies, Mumbai. The above search was conducted under Challan bearing SRN X93720563 dated February 05, 2025 for V2 MCA portal and UU3797901 dated September 8, 2026 for V3 MCA portal, copies of which are annexed herewith for your reference.

Based on the documents examined and explanations provided, we confirm that the Company is broadly compliant with applicable provisions of the Companies Act 1956 and Companies Act, 2013, subject to routine filings and procedural formalities, if any.

We trust you will find the enclosed Report in order. Please feel free to contact us should you require any further clarification or assistance in this regard.

Thanking you,
Yours sincerely,

For Nirmal Tiwari & Associates
Company Secretaries

NIRMAL Digitally signed
by NIRMAL
TIWARI
TIWARI Date: 2026.09.09
11:14:08 +05'30'

Nirmal Tiwari
Proprietor
C.P. No. 25159
M. No.: F11031
UDIN: F011031H001412411



Place: Mumbai

Encl: Search and Status Report

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



DUE DILIGENCE REPORT

Name of the Company	:	GROMA GLOBAL LIMITED
Date of Incorporation	:	February 24, 2006
CIN of the Company	:	U51101MH2006PLC160008
Registered Office (At Present)	:	1102A 11th Floor Fortune Terraces, Opp Citi Mall, New Link Road, Near Lower Oshiwara Metro Station, Andheri West, Mumbai, Maharashtra, India, 400053
Authorized Share Capital (At Present)	:	₹25,00,00,000 (Consisting of 2,50,00,000 Equity Shares of INR 10/- each)
Paid up Share Capital (At Present)	:	₹16,00,20,000 (Consisting of 1,60,02,000 Equity Shares of INR 10/- each)
Face Value of Equity Shares	:	Rs. 10/- each
Class of Share Capital	:	There is one class of share capital i.e. Equity Share Capital

The details of respective annexures are as follows:

PARTICULARS	:	ANNEXURE NO.
SUBSCRIBERS TO THE MOA & FIRST DIRECTORS	:	Annexure-I
CHANGES IN AUTHORISED CAPITAL OF THE COMPANY	:	Annexure-II
CHANGES IN PAID-UP SHARE CAPITAL OF THE COMPANY	:	Annexure-III
CHANGE IN DIRECTORS/ KMP OF THE COMPANY	:	Annexure-IV
CHANGE IN AUDITORS OF THE COMPANY	:	Annexure-V
ANNUAL RETURNS FILED BY THE COMPANY	:	Annexure-VI
MATERIAL EVENT BASED COMPLIANCES BY THE COMPANY	:	Annexure-VII
ACCEPTANCE OF DEPOSITS FROM MEMBERS/PUBLIC COMPLAINTS	:	Annexure-VIII
COMPLAINTS RELATED TO RESOLUTIONS AND AGREEMENTS TO BE FILED UNDER SECTION 117 OF THE COMPANIES ACT, 2013 AND OTHER E-FORMS	:	Annexure-IX
COMPLAINTS RELATED TO MSME DISCLOSURES	:	Annexure-X
COMPLAINTS RELATED TO CHARGES REGISTERED WITH THE REGISTRAR OF COMPANIES	:	Annexure-XI
COMPLIANCES RELATED TO CHANGES IN THE REGISTERED OFFICE OF THE COMPANY	:	Annexure-XII
COMPLIANCES RELATED TO SIGNIFICANT BENEFICIAL OWNERSHIP (SBO)	:	Annexure-XIII
ADDITIONAL REMARKS IN RELATION TO THE COMPANY'S SECRETARIAL PRACTICES AND STATUTORY COMPLIANCES	:	Annexure-XIV



ANNEXURE-I

SUBSCRIBERS TO THE MOA:

Sr. No.	Name of Subscribers	Number of Equity Shares	Face Value per Equity Share
1	Mr. Chunilal Ravji Chedda	12,000	10
2	Mr. Sharad Devraj Maru	12,000	10
3	Mr. Chanderkumar O. Murgai	50,000	10
4	Mr. Ashok Amritlal Kiri	12,000	10
5	Mr. Deepak Karani	12,000	10
6	Mr. Kirit D Maroo	12,000	10
7	Mr. Narendra Maru	12,000	10
	Total	1,22,000	10

FIRST DIRECTORS OF THE COMPANY:

Sr. No.	Name of Directors	DIN
1	Mr. Chunilal Ravji Chedda	00047691
2	Mr. Sharad Devraj Maru	00081041
3	Mr. Chanderkumar Omprakash Murgai	00046209
4	Mr. Ashok Amritlal Kiri	00047628
5	Mr. Deepak Premji Karani	02597094
6	Mr. Kirit Dungershi Maroo	02630272
7	Mr. Narendra Laxmichand Maru	02630296
	Total	7

Details of Incorporation forms [Form 1/ INC 20A]:

Sr. No.	Form No.	Date of Event	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	COI	Date of Incorporation: February 24, 2006	-	-	Incorporation of Company as Groma Global Limited
2	Form 18	-	February 20, 2006	-	Notice of situation of registered office at the time of incorporation



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Date of Event	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
3	Form 32	-	February 20, 2006	-	Particulars of Appointment of first directors of the company at the time of incorporation

Note: Since the company was incorporated on February 24, 2006, physical form filing of incorporation forms like Form 1A (application for name), Form 1 (Application and declaration of Company) were filed by the company which are not available on MCA records.



ANNEXURE-II

CHANGES IN AUTHORISED CAPITAL OF THE COMPANY:

Sr. No	Form No.	Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
2	Form SH-7	EGM: 12.06.2026	12.07.2026	19.06.2026	-	Increase in authorized share capital of the company from Rs. 5.00 crores to Rs. 25.00 crores independently by the company. Attachments: 1. EGM Resolution 2. Board Resolution 3. Notice of EGM 4. Altered MOA

Since incorporation, the authorized equity share capital of the Company has been altered in the following manner:

- The initial authorized share capital on Company's incorporation of ₹ 500.00 Lakhs only divided into 50,00,000 Equity Shares of ₹10/- each.
- The authorized share capital was increased from ₹500.00 Lakhs divided into 50,00,000 Equity Shares of ₹10/- each to ₹2,500.00 Lakhs divided into 2,50,00,000 Equity Shares of ₹10/- each vide Shareholders' resolution dated June 12, 2026.



ANNEXURE-III

CHANGES IN PAID-UP SHARE CAPITAL OF THE COMPANY:

Sr. No	Form No.	Date of Event	Due Date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	Form 2	Date of Allotment- 01.12.2012	31.12.2012	24.12.2012	-	Allotment of 16,56,000 equity shares. Attachments: 1. List of Allotees and Board resolution 2. Valuation Certificate <i>Remarks: CIN is missing on the letter head of the company on which board resolution and list of allottees have been taken by the company.</i>
2	PAS-3	Date of Allotment: 20.06.2026	20.07.2026	25.06.2026	-	Allotment of 1,42,24,000 equity shares on bonus issue. Attachments: 1. List of Allotees 2. Board resolution

1. Details of Allotment:

Date of Allotment	No. of Equity Shares allotted	Face Value (₹)	Offer Price (₹)	Nature of Consideration	Nature of Allotment
Upon Incorporation i.e., 24.02.2006	1,22,000	10	10	Cash	Subscription to MOA

List of Allotees:

Sr No	Name	No of Equity Shares
1	Mr. Chunilal Ravji Chedda	12,000
2	Mr. Sharad Devraj Maru	12,000
3	Mr. Chanderkumar O. Murgai	50,000
4	Mr. Ashok Amritlal Kiri	12,000
5	Mr. Deepak Karani	12,000
6	Mr. Kirit D Maroo	12,000
7	Mr. Narendra Maru	12,000
	Total	1,22,000



2. Details of Allotment:

Date of Allotment	No. of Equity Shares allotted	Face Value (₹)	Offer Price (₹)	Nature of Consideration	Nature of Allotment
01.12.2012	16,56,000	10	10	Cash	Further Allotment

List of Allotees:

Sr No	Name	No of Equity Shares
1	Shishir Kabra	7,50,000
2	Dhruv Kabra	7,50,000
3	Savita Kabra	1,56,000
	Total	16,56,000

3. Details of Allotment:

Date of Allotment	No. of Equity Shares allotted	Face Value (₹)	Offer Price (₹)	Nature of Consideration	Nature of Allotment
20.06.2026	1,42,24,000	10	NA	Other than Cash	Bonus Issue

List of Allotees:

Sr No	Name	No of Equity Shares
1	Mr. Dhruv D Kabra	70,32,000
2	Mr. Shishir D Kabra	70,32,000
3	Ms. Anchal Dhruv Kabra	1,59,680
4	Ms. Harshita Pawan Kabra	80
5	Ms. Janhavi Pawan Kabra	80
6	Ms. Ruchira Jhunjhunwala	80
7	Ms. Akshar Pawan Kabra	80
	Total	1,42,24,000



ANNEXURE-IV

CHANGE IN DIRECTORS/ KMP OF THE COMPANY:

Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	Form 32	1. Dhruv Dilip Kabra 2. Shishir Dilip Kabra 3. Premnarayan Bishambardayal Kabra	Appointment as director (Non-Executive)	18.05.2009	17.06.2009	24.05.2009	-	Appointment of Dhruv Dilip Kabra, Shishir Dilip Kabra and Premnarayan Bishambardayal Kabra as director(non-executive) of the company w.e.f. 18.05.2009 Attachment: consent to act as director
2	Form 32	1. Chanderkumar Omprakash Murgai 2. Ashok Amritlal Kiri 3. Chunilal Ravji Chheda 4. Sharad Devraj Maru 5. Deepak Premji Karani 6. Kirit Dungarshi Maru 7. Narendra Laxmichand Maru	Cessation	Date of Resignation: 20.05.2009	19.06.2009	11.06.2009	-	Resignation of directors mentioned from the directorship of the company w.e.f. 20.05.2009. Attachments: Resignation letters of the resigned directors. Remarks: All the resignation letters are taken on the letter head of the company, whereas the resignation letters are a personal letter



Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>from the resigning directors and no need of company's letterhead is required.</i>
3	Form 32	Savita Dilip Kabra	Appointment as director (executive)	10.07.2011	09.08.2011	28.08.2011	19 days	Appointment of Savita Dilip Kabra as director (executive) of the company w.e.f. 10.07.2011 Attachment: consent to act as director Remarks: 19 days of delay in filing the form.
4	Form 32	Premnarayan Bishambardayal Kabra	Cessation	Date of Resignation: 29.11.2011	29.12.2011	28.12.2011	-	Resignation from the directorship of the company w.e.f. 29.11.2011 Attachment: Resignation letter
5	Form 32	Debasish Pal	Appointment as Independent director (non-executive)	28.03.2012	27.04.2012	02.04.2012	-	Appointment of Debasish Pal as director (Non-executive) of the company w.e.f. 28.03.2012. Attachment: consent to act as director



Nirmal Tiwari & Associates
Company Secretaries

Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>Remarks:</i> <i>Consent to act as director is specified in the consent letter attached whereas appointment as non-executive independent director has been done.</i>
6	Form 32	Savita Dilip Kabra	Cessation	Date of Resignation: 28.03.2012	27.04.2012	02.04.2012	-	Resignation from the directorship of the company w.e.f. 28.03.2012 Attachment: Resignation letter
7	Form 32	Sandhya Pawan Kabra	Appointment as additional director (Executive)	28.08.2012	27.09.2012	19.12.2012	83 days	Appointment of Sandhya Pawan Kabra as additional director (executive) of the company w.e.f. 28.08.2012. Attachments: 1. Board Resolution 2. Consent to act as director <i>Remarks:</i> <i>1. In the resolution</i>



Sr No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>attached it is mentioned that Debasish Pal has tendered the resignation and Sandhya Kabra has been appointed, whereas no resignation form was filed for the resignation of Debasish Pal.</i> <i>2. Consent to act as director is specified in the consent letter attached whereas appointment as additional director has been done.</i> <i>3. 83 days of delay in filing the form.</i>
8	Form 32	Sandhya Pawan Kabra	Cessation	Date of Resignation: 27.01.2013	26.02.2013	01.04.2013	34 days	Resignation from the directorship of the company w.e.f. 27.01.2013



Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								Attachment: Resignation letter <i>Remarks: 34 days of delay in filing the form.</i>
9	Form DIR-12	Ashish Kankani Shyam Sunder	Appointment as Additional Director (Non-Executive)	13.06.2019	13.07.2019	14.06.2019	-	Appointment of Ashish Kankani Shyam Sunder as additional director (Non-executive) of the company w.e.f. 13.06.2019. Attachment: 1. consent to act as director 2. MCA master data <i>Remarks: consent to act as director is attached and not additional director.</i>
10	Form DIR-12	Dhruv Kabra Dilip	Cessation	Date of Resignation: 13.06.2019	13.07.2019	14.06.2019	-	Resignation from the directorship of the company w.e.f. 13.06.2019 Attachment: DIR-8 <i>Remarks: Resignation letter not</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>attached in the form.</i>
11	Form DIR-12	Brijpal Udayraj Singh	Appointment as Additional Director (Non-Executive)	21.09.2019	21.10.2019	25.09.2019	-	Appointment of Brijpal Udayraj Singh as additional director (Non-executive) of the company w.e.f. 21.09.2019. Attachment: consent to act as director Remarks: <i>consent to act as director is attached and not additional director.</i>
12	Form DIR-12	Ashish Kankani Shyam Sunder	Cessation	Date of Resignation: 21.09.2019	21.10.2019	26.09.2019	-	Resignation from the directorship of the company w.e.f. 21.09.2019 Attachment: Resignation letter and acceptance of resignation letter



Nirmal Tiwari & Associates
Company Secretaries

Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
13	Form DIR-12	Brijpal Udayraj Singh	Regularization as Director (Non-Executive)	30.09.2019	30.10.2019	29.10.2019	-	Regularization of Brijpal Udayraj Singh as director (Non-executive) of the company w.e.f.30.09.2019. Remarks: No attachments attached in the form.
14	Form DIR-12	Dhruv Dilip Kabra	Appointment as Additional Director (Executive)	31.03.2023	30.04.2023	31.03.2023	-	Appointment of Dhruv Dilip Kabra as additional director (executive) of the company w.e.f. 31.03.2023. Attachment: 1. consent to act as director 2. Board Resolution 3. MCA master data for declaration of directorship Remarks: consent to act as director is attached and



Nirmal Tiwari & Associates
Company Secretaries

Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>not additional director.</i>
15	Form DIR-12	Debasish Pal	Cessation	Date of Resignation: 31.03.2023	30.04.2023	31.03.2023	-	Resignation from the directorship of the company w.e.f. 31.03.2023 Attachment: 1. Resignation letter 2. acceptance of resignation letter 3. Board Resolution
16	Form DIR-12	Dhruv Dilip Kabra	Regularization as Director (Executive)	30.09.2023	30.10.2023	28.10.2024	364 days	Regularization of Dhruv Dilip Kabra as director (executive) of the company w.e.f. 30.09.2023. Remarks: 1. <i>No attachments attached in the form.</i> 2. <i>364 days of delay in</i>



Sr. No.	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>filing the form.</i>
17	Form DIR-12	1. Shishir Dilip Kabra 2. Dhruv Dilip Kabra	1. Change in Designation from director to Managing Director 2. Change in designation from director to Whole Time Director	06.05.2025	05.06.2025	20.05.2025	-	Change in Designation of mentioned directors for a period of 5 years of the company w.e.f. 06.05.2025. Attachments: Board resolution and EGM resolution of Shishir Kabra and Dhruv Kabra Remarks: 1. <i>Consent to act as director not attached in the form</i> 2. <i>In the resolutions the agenda has been mentioned as appointment of Mr. Dhruv Dilip Kabra as the WTD instead of Change in Designation, whereas in the form</i>



Sr No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>DIR-12 change in designation is ticked, clerical mistake happened in the resolutions alongwith explanatory statement attached in the form.</i> <i>3. The remuneration mentioned is as 2.75 lakhs per annum instead of 2.75 lakhs per month in the board resolution, EGM resolution alongwith Explanatory statement for Shishir Kabra.</i> <i>4. In the EGM Resolution of Dhruv Kabra, in one of the resolution it is mentioned Ms. Nasreen Shiraz</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								<i>instead of Dhruv Kabra, clerical mistake has happened. 5. In the explanatory statement attached with EGM resolution of Dhruv Kabra, amount of remuneration is not mentioned.</i>
18	Form DIR-12	Mr. Mahesh Dhanesh Maloo	Appointment as CFO	01.11.2025	01.12.2025	28.01.2026	58 days	Appointment of Mr. Mahesh Dhanesh Maloo as the CFO of the Company w.e.f. 01.11.2025. Attachments: Board Resolution, consent letter, appointment letter and KYC documents. <i>Remarks: 58 days of delay in filing the form.</i>
19	DIR-12	Ms. Apeksha Baradia	Appointment as Company Secretary & Compliance Officer	01.05.2026	31.05.2026	09.05.2026	-	Appointment of Ms. Apeksha Baradia as the Company Secretary & Compliance



Sr. No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
								Officer w.e.f. May 01, 2026. Attachment: 1. Board Resolution 2. Consent letter to act as CS & CO 3. Letter of Appointment 4. KYC of CS
20	DIR-12	Mr. Ashish Kumar Sodani	Appointment of Non-Executive Independent Director	24.01.2026	23.02.2026	07.02.2026	-	Appointment of Mr. Ashish Kumar Sodani as the Non-Executive Independent Director w.e.f. 24.01.2026 for 3 years. Attachments: 1. Board Resolution 2. EGM resolution alongwith explanatory statement 3. Letter of Appointment 4. Declaration of independence 5. DIR-2, DIR-8 and MBP-1 6. Shorter Notice Consent



Sr No	Form No.	Name of Director/ KMP	Details of Change	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
21	DIR-12	Ms. Jyoti Keshavkumar Dubey	Appointment as Non-Executive Independent Director	07.03.2026	06.04.2026	11.03.2026	-	Appointment of Ms. Jyoti Keshavkumar Dubey as the Non-Executive Independent Director w.e.f. 07.03.2026 for a period of 3 years. Attachments: 1. Board Resolution 2. EGM resolution alongwith explanatory statement 3. Letter of Appointment 4. Declaration of independence 5. DIR-2. DIR-8 and MBP-1 6. Shorter Notice Consent



Details for Appointment:

Name of the Directors/ KMP	Designation	Date of Appointment [i.e., Effective Date]	Tenure, if any	Remuneration Terms, if any
Dhruv Dilip Kabra	Director (Non-Executive)	18.05.2009	-	-
Shishir Dilip Kabra				
Premnarayan Bishambardayal Kabra				
Savita Dilip Kabra	Director(Executive)	10.07.2011	-	-
Debasish Pal	Independent Director (non-executive)	28.03.2012	-	-
Sandhya Pawan Kabra	Additional Director (Executive)	28.08.2012	Upto ensuing AGM	-
Ashish Kankani Shyam Sunder	Additional Director (non-executive)	13.06.2019	Upto ensuing AGM	-
Brijpal Udayraj Singh	Additional Director (non-executive)	21.09.2019	Upto ensuing AGM	-
Dhruv Dilip Kabra	Additional Director (executive)	31.03.2023	Upto ensuing AGM	-
Mahesh Dhanesh Maloo	Chief Financial Officer	01.11.2025	-	-
Apeksha Baradia	Company Secretary & Compliance Officer	01.05.2026	-	-
Ashish Kumar Sodani	Non-Executive Independent Director	24.01.2026	Appointed for 3 years	-
Jyoti Keshavkumar Dubey	Non-Executive Independent Director	07.03.2026	Appointed for 3 years	-

Details for Re-designation:

Name of the Directors/ KMP	Designation Change From	Designation Change To	Date of Resolution
Brijpal Udayraj Singh	Additional Director	Director	AGM: 30.09.2019
Dhruv Dilip Kabra	Additional Director	Director	AGM: 30.09.2023
Shishir Dilip Kabra	Director	Managing Director	BM: 06.05.2025 EGM: 08.05.2025
Dhruv Dilip Kabra	Director	Whole Time Director	BM: 06.05.2025 EGM: 08.05.2025



Details for Resignation/ Cessation:

Name of the Directors/ KMP	Date of Resolution	Reasons for resignation
Chanderkumar Omprakash Murgai	20.05.2009	Not mentioned in the resignation letter attached in the form.
Ashok Amritlal Kiri		
Chunilal Ravji Chheda		
Sharad Devraj Maru		
Deepak Premji Karani		
Kirit Dungarshi Maru		
Narendra Laxmichand Maru		
Premnarayan Bishambardayal Kabra	29.11.2011	Pre-occupation and other commitments
Savita Dilip Kabra	28.03.2012	Retirement
Sandhya Pawan Kabra	27.01.2013	Personal Reasons
Dhruv Dilip Kabra	13.06.2019	Disqualification under section 164
Ashish Kankani Shyam Sunder	21.09.2019	Not mentioned in the resignation letter attached in the form.
Debasish Pal	31.03.2023	Personal and unavoidable circumstances



ANNEXURE-V

CHANGE IN AUDITORS OF THE COMPANY:

Sr. No	Form No.	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
9	Form ADT-1	Date of Appointment 30.09.2014	15.10.2014	15.06.2019	1704 days	Appointment of DP Sarkar & Co. Chartered Accountants as the auditor of the company in AGM dated 30.09.2014 for 5 consecutive FY starting from 01.04.2014 to 31.03.2019 <u>Attachments:</u> 1. Appointment letter or intimation letter 2. Consent and eligibility certificate by auditor 3. AGM resolution dated 30.09.2014 <i>Remarks:</i> 1. <i>In the resolution and consent received from the auditor it is mentioned that the auditor is appointed from 8th AGM till 13th AGM, instead of 9th AGM till 14th AGM.</i> 2. <i>1704 days of delay in filing the form.</i>
11	Form ADT-1	Date of Appointment 30.09.2019	15.10.2019	15.10.2019	-	Re-appointment of DP Sarkar & Co. Chartered Accountants as the auditor of the company in AGM dated 30.09.2019 for 5 consecutive FY starting from 01.04.2019 to 31.03.2024. <u>Attachments:</u> 1. Appointment letter or intimation letter 2. Consent and eligibility certificate by auditor 3. AGM resolution dated 30.09.2019 <i>Remarks:</i> <i>In the resolution and consent received from the auditor it is mentioned that the auditor is</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No	Form No.	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
						<i>appointed from 12th AGM till 17th AGM, instead of 14th AGM till 19th AGM.</i>
12	Form ADT-1	Date of Appointment 30.09.2024	15.10.2024	14.10.2024	-	Re-appointment of DP Sarkar & Co. Chartered Accountants as the auditor of the company in AGM dated 30.09.2024 for 5 consecutive FY starting from 01.04.2024 to 31.03.2029. Attachments: 1. Appointment letter or intimation letter 2. Consent and eligibility certificate by auditor 3. AGM resolution dated 30.09.2024 <i>Remarks: In the resolution and consent received from the auditor it is mentioned that the auditor is appointed from 17th AGM till 22nd AGM, instead of 19th AGM till 24th AGM.</i>

Details:

Name of the Auditor [As per details mentioned in form]	Appointment/Resignation	Date of Appointment / Resignation	Reason for resignation
D P Sarkar & Co., Address: 90/1A Sarat Bose Road, Kolkata, West Bengal-WB 700026, India Tel: 03324746034 Email: tamalbasu.fmt@gmail.com Membership No: 054921 Firm Reg No: 320048E	Appointment for 5 years starting from 01.04.2014 to 31.03.2019	30.09.2014	-
D P Sarkar & Co., Address: 90/1A Sarat Bose Road, Kolkata, West Bengal-WB 700026, India Tel: 03324746034 Email: tamalbasu.fmt@gmail.com Membership No: 054921	Re-appointment for 5 years starting from 01.04.2019 to 31.03.2024	30.09.2019	-

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Nirmal Tiwari & Associates
Company Secretaries

Name of the Auditor [As per details mentioned in form]	Appointment/ Resignation	Date of Appointment / Resignation	Reason for resignation
Firm Reg No: 320048E			
D P Sarkar & Co., Address: 90/1A Sarat Bose Road, Kolkata, West Bengal-WB 700026, India Tel: 03324746034 Email: tamalbasu.fmt@gmail.com Membership No: 054921 Firm Reg No: 320048E	Re-appointment for 5 years starting from 01.04.2024 to 31.03.2029	30.09.2024	-

Note: No form 23 B has been filed by the auditors of the company for their acceptance of the appointment since incorporation till FY 2013-14.



ANNEXURE-VI

ANNUAL RETURNS FILED BY THE COMPANY:

FORM 66:

Sr. No.	Financial year	Date of compliance certificate	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	For the period starting from 24.02.2006 to 31.03.2006	14.05.2009	29.09.2006	29.10.2006	15.05.2009	929 days	Compliance Certificate filed for the period starting from 24.02.2006 to 31.03.2006. Attachments: Compliance certificate dated 14.05.2006 Remarks: <i>1. 929 days of delay in filing the form.</i> <i>2. Registration number mentioned in the compliance certificate is unlisted and the CIN reflecting in the form is listed.</i>
2	FY 2006-07	14.05.2009	28.09.2007	28.10.2007	15.05.2009	565 days	Compliance Certificate filed for the financial year 2006-07. Attachments: Compliance certificate dated 14.05.2009 Remarks: <i>1. 565 days of delay in filing the form.</i> <i>2. Registration number mentioned in the compliance certificate is unlisted and the CIN reflecting in the form is listed.</i>
3	FY 2007-08	14.05.2009	30.09.2008	30.10.2008	15.05.2009	197 days	Compliance Certificate filed for the financial year 2007-08.



Sr. No.	Financial year	Date of compliance certificate	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: Compliance certificate dated 14.05.2009. Remarks: 1. 197 days of delay in filing the form. 2. Registration number mentioned in the compliance certificate is unlisted and the CIN reflecting in the form is listed.
4	FY 2008-09	15.12.2011	30.09.2009	30.10.2009	15.12.2011	776 days	Compliance Certificate filed for the financial year 2008-09. Attachments: Compliance certificate dated 15.12.2011. Remarks: 1. 776 days of delay in filing the form. 2. Forms filed during the reporting year has not been mentioned in the compliance certificate
5	FY 2009-10	15.12.2011	30.09.2010	30.10.2010	15.12.2011	411 days	Compliance Certificate filed for the financial year 2009-10. Attachments: Compliance certificate dated 15.12.2011. Remarks: 1. 411 days of delay in filing the form. 2. Three BM dated 18.05.2009, 20.05.2009 and 02.03.2010 have not been taken into



Sr. No.	Financial year	Date of compliance certificate	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							<i>record in the compliance certificate. 3. The date of filing the forms mentioned in the compliance certificate is wrong</i>
6	FY 2010-11	05.09.2011	30.09.2011	30.10.2011	28.12.2011	59 days	Compliance Certificate filed for the financial year 2010-11. Attachments: Compliance certificate dated 05.09.2011. Remarks: 1. 59 days of delay in filing the form. 2. Forms filed during the reporting year has not been mentioned in the compliance certificate.
7	FY 2012-13	05.09.2013	30.09.2013	30.10.2013	31.12.2014	427 days	Compliance Certificate filed for the financial year 2012-13. Attachments: Compliance certificate dated 05.09.2013. Remarks: 1. 427 days of delay in filing the form. 2. Board Meeting dates are not mentioned in the compliance certificate 3. Date of previous AGM for FY 2011-12 mentioned in the compliance certificate is 29.09.2012 instead of 30.09.2012, clerical mistake happened in



Sr. No.	Financial year	Date of compliance certificate	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							<i>the compliance certificate.</i>
8	FY 2013-14	12.09.2014	30.09.2014	30.10.2014	27.03.2017	879 days	Compliance Certificate filed for the financial year 2013-14. Attachments: Compliance certificate dated 12.09.2014. Remarks: 1. 879 days of delay in filing the form. 2. Board Meeting dates are not mentioned in the compliance certificate. 3. Forms filed during the reporting year has not been mentioned in the compliance certificate

Note: Form 66 for the FY 2011-12 not found in the MCA records.

FORM 23ACA:

Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	For the period starting from 24.02.2006 to 31.03.2006	02.09.2006	29.09.2006	29.10.2006	15.05.2009	929 days	Profit & Loss account and documents filed by the company with registrar for the period starting from 24.02.2006 to 31.03.2006. Attachments: Statement of profit & loss account. Remarks:



Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							929 days of delay in filing the form - Registration number mentioned in the abstract attached with balance sheet is unlisted and the CIN reflecting in the form is listed. - Independent auditors report is missing
2	FY 2006-07	03.09.2007	28.09.2007	28.10.2007	15.05.2009	565 days	Profit & Loss account and documents filed by the company with registrar for the FY 2006-07. Attachments: Statement of profit & loss account. Remarks: 565 days of delay in filing the form. - Registration number mentioned in the abstract attached with balance sheet is unlisted and the CIN reflecting in the form is listed. - Independent auditors report is missing
3	FY 2007-08	02.09.2008	30.09.2008	30.10.2008	15.05.2009	197 days	Profit & Loss account and documents filed by the company with



Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							registrar for the FY 2007-08. Attachments: Statement of profit & loss account. Remarks: 197 days of delay in filing the form. - Registration number mentioned in the abstract attached with balance sheet is unlisted and the CIN reflecting in the form is listed. - Independent auditors report is missing
4	FY 2008-09	18.05.2009	30.09.2009	30.10.2009	18.01.2010	80 days	Profit & Loss account and documents filed by the company with registrar for the FY 2008-09. Attachments: Statement of profit & loss account. Remarks: 80 days of delay in filing the form. - Independent auditors report is missing
5	FY 2009-10	08.05.2010	30.09.2010	30.10.2010	15.12.2011	411 days	Profit & Loss account and documents filed by the company with



Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							registrar for the FY 2009-10. Attachments: Statement of profit & loss account. Remarks: <i>Independent auditors report is missing.</i> <i>P&L statement is not signed by any directors of the company</i> <i>411 days of delay in filing the form.</i>
6	FY 2010-11	05.09.2011	30.09.2011	30.10.2011	28.12.2011	59 days	Profit & Loss account and documents filed by the company with registrar for the FY 2010-11. Attachments: Statement of profit & loss account. Remarks: <i>Independent auditors report is missing.</i> <i>The statement of P&L attached is undated</i> <i>59 days of delay in filing the form.</i>
7	FY 2011-12	30.08.2012	30.09.2012	30.10.2012	14.11.2014	745 days	Profit & Loss account and documents filed by the company with registrar for the FY 2011-12.



Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: Statement of profit & loss account. Remarks: 1. <i>Independent auditors report is missing.</i> 2. <i>The statement of P&L is undated</i> 3. <i>745 days of delay in filing the form.</i>
8	FY 2012-13	10.09.2013	30.09.2013	30.10.2013	30.12.2014	426 days	Profit & Loss account and documents filed by the company with registrar for the FY 2012-13. Attachments: Statement of profit & loss account. Remarks: 1. <i>Independent auditors report is missing.</i> 2. <i>The statement of P&L is undated</i> 3. <i>426 days of delay in filing the form.</i>
9	FY 2013-14	12.09.2014	30.09.2014	30.10.2014	24.03.2017	876 days	Profit & Loss account and documents filed by the company with registrar for the FY 2012-13. Attachments: Statement of profit & loss account. Remarks:



Sr. No.	Financial year	Date of financial statements approval Signing by Auditors	Date of AGM/Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							1. Independent auditors report is missing. 2. 876 days of delay in filing the form.

FORM 23AC/23 AC XBRL/AOC-4/AOC-4 XBRL:

Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
1	Form 23 AC	For the period starting from 24.02.2006 to 31.03.2006	02.09.2006	29.09.2006	29.10.2006	15.05.2009	929 days	-	Balance sheet and other documents filed by the company with registrar for the period starting from 24.02.2006 to 31.03.2006. Attachments: - Auditors report including balance sheet. - Directors report Remarks: - Directors report is not physically signed by the directors of the company. - Directors report was not taken on



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>the letter head of the company.</i> 3. <i>Registration number mentioned in the abstract attached with balance sheet is unlisted and the CIN reflecting in the form is listed.</i> 4. <i>929 days of delay in filing the form</i>
2	Form 23 AC	FY 2006-07	03.09.2007	28.09.2007	28.10.2007	15.05.2009	565 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2006-07. Attachments: Auditors report alongwith Balance sheet and Directors report. Remarks: 1. <i>565 days of delay in filing the form.</i> 2. <i>Directors report was not taken on the letter head of the company</i> 3. <i>Registration number mentioned in the abstract attached with balance sheet is unlisted and the</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>CIN reflecting in the form is listed.</i>
3	Form 23 AC	FY 2007-08	02.09.2008	30.09.2008	30.10.2008	15.05.2009	197 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2007-08. Attachments: Auditors report alongwith Balance sheet and Directors report. Remarks: 1. 197 days of delay in filing the form. 2. Directors report was not taken on the letter head of the company 3. Registration number mentioned in the abstract attached with balance sheet is unlisted and the CIN reflecting in the form is listed.
4	Form 23 AC	FY 2008-09	18.05.2009	30.09.2009	30.10.2009	18.01.2010	80 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2008-09. Attachments: Auditors report alongwith



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									Balance sheet and Directors report. <i>Remarks:</i> 1. 80 days of delay in filing the form. 2. Directors report was not taken on the letter head of the company
5	Form 23 AC	FY 2009-10	08.05.2010	30.09.2010	30.10.2010	15.12.2011	411 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2009-10. Attachments: Auditors report alongwith Balance sheet and Directors report. <i>Remarks:</i> 1. 411 days of delay in filing the form. 2. Directors report was not taken on the letter head of the company. 3. In Directors Report it is mentioned that Madan Dedhia & Associates will retire and eligible for re-appointment whereas the financials for the



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>reporting period has been audited by DP sarkar & Co., details of its appointment and resignation of old auditors are not included in the directors report.</i>
6	Form 23 AC	FY 2010-11	08.05.2010	30.09.2011	30.10.2011	28.12.2011	59 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2010-11. Attachments: Auditors report alongwith Balance sheet and Directors report. Remarks: 59 days of delay in filing the form. - In the form it is mentioned that Shishir Kabra has also signed the board's report but only dhruv kabra has signed the same. - Directors report was not taken on the letter head of the company.



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>4. In Directors Report it is mentioned that Prajapati & Associates will retire and eligible for re-appointment whereas the financials for the reporting period has been audited by DP sarkar & Co., details of their resignation and appointment of Prajapati & Associates are not mentioned in the directors report.</i>
7	Form 23 AC	FY 2011-12	30.08.2012	30.09.2012	30.10.2012	14.11.2014	745 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2011-12. Attachments: Auditors report alongwith Balance sheet, Notice of AGM and Directors report. Remarks: <i>745 days of delay in filing the form.</i> <i>Wrong number of shares and amount has been reported</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>in the balance sheet as no allotment was done in the reporting financial year, whereas actual allotment of shares was done in the FY 2012-13.</i> 3. <i>Email ID, Contact details and CIN not mentioned on the letter head of the company on which Directors report and notice of AGM have been taken by the company.</i> 4. <i>Notice of AGM, Auditors Report and Directors report is unsigned</i> 5. <i>4th AGM is mentioned in Notice of AGM and Directors report instead of 7th AGM, clerical mistake has happened.</i> 6. <i>In the form and on the letter head of the auditors report name of the auditors mentioned is DP Sagar & Co. instead of DP Sarkar & Co.,</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>clerical mistake has happened.</i> <i>7. Balance sheet attached is undated</i>
8	Form 23 AC	FY 2012-13	10.09.2013	30.09.2013	30.10.2013	30.12.2014	426 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2012-13. Attachments: Auditors report alongwith Balance sheet, Notice of AGM and Directors report. Remarks: 426 days of delay in filing the form. - Email ID, Contact details and CIN not mentioned on the letter head of the company on which Directors report and notice of AGM have been taken by the company. - Notice of AGM, Auditors Report and Directors report is unsigned 4th AGM is mentioned in Notice of AGM and Directors report



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>instead of 8th AGM, clerical mistake has happened.</i> <i>5. Balance sheet attached is undated</i> <i>6. Notes to account attached with the financials are not signed by the auditors as well as directors of the company and also is unsigned by them.</i> <i>7. Auditors report, directors report and notice of AGM are not physically signed by the respective parties.</i>
9	Form 23 AC	FY 2013-14	12.09.2014	30.09.2014	30.10.2014	24.03.2017	876 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2013-14. Attachments: Auditors report alongwith Balance sheet and Directors report. Remarks: <i>1. 876 days of delay in filing the form.</i> <i>2. CIN not mentioned on the letter head of</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>the company on which Directors report has been taken by the company.</i> 3. 8th AGM is mentioned in Directors report instead of 9th AGM, clerical mistake has happened.
10	Form AOC-4	FY 2014-15	06.09.2015	30.09.2015	30.10.2015	17.03.2017	504 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2014-15. Attachments: Auditors report alongwith Balance sheet and Directors report alongwith AOC-2 and MGT-9. Remarks: 1. 504 days of delay in filing the form. 2. CIN not mentioned on the letter head of the company on which Directors report has been taken by the company. 3. 9th AGM is mentioned in



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>Directors report instead of 10th AGM, clerical mistake has happened.</i> <i>4. MGT-9 attached in the form is unsigned.</i>
11	Form AOC-4	FY 2015-16	17.09.2016	30.09.2016	30.10.2016	02.12.2016	33 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2015-16. Attachments: Auditors report alongwith Balance sheet and Directors report alongwith AOC-2 and MGT-9. Remarks: <i>33 days of delay in filing the form.</i> <i>10th AGM is mentioned in Directors report instead of 11th AGM, clerical mistake has happened.</i> <i>In directors report one BM date is mentioned as 14.01.2015 instead of 14.01.2016.</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									4. MGT-9 attached in the form is unsigned.
12	Form AOC-4	FY 2016-17	29.09.2017	30.09.2017	30.10.2017	05.07.2018	218 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2016-17. Attachments: Auditors report alongwith Balance sheet and Directors report alongwith AOC-2 and MGT-9. Remarks: 218 days of delay in filing the form. 11th AGM is mentioned in Directors report instead of 12th AGM, clerical mistake has happened. - MGT-9 attached in the form is unsigned.
13	Form AOC-4	FY 2017-18	24.08.2018	29.09.2018	29.10.2018	04.01.2019	67 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2017-18.



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									Attachments: Auditors report alongwith Balance sheet and Directors report alongwith AOC-2 and MGT-9. Remarks: 67 days of delay in filing the form. 12th AGM is mentioned in Directors report instead of 13th AGM, clerical mistake has happened.
14	Form AOC-4	FY 2018-19	19.09.2019	30.09.2019	30.10.2019	18.12.2019	49 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2018-19. Attachments: Auditors report alongwith Balance sheet and Directors report alongwith AOC-2 and MGT-9. Remarks: 49 days of delay in filing the form. 13th AGM is mentioned in Directors report



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>instead of 14th AGM, clerical mistake has happened.</i> <i>3. MGT-9 attached in the form is unsigned.</i>
15	Form AO C-4	FY 2019-20	23.12.2020	31.12.2020	30.01.2021	15.02.2021	-	-	Balance sheet and other documents filed by the company with registrar for the financial year 2019-20. Attachments: - Auditors report alongwith Balance sheet and notes to accounts - Directors report alongwith MGT-9. - ROC Extension Letter Remarks: <i>14th AGM is mentioned in Directors report instead of 15th AGM, clerical mistake has happened.</i> <i>Due to covid no additional fees was required to pay for the delay in filing the form</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									3. <i>MGT-9 attached in the form is unsigned.</i> 4. <i>The due date of holding AGM mentioned in the form is 31.12.2020 whereas the due date of holding AGM was 30.09.2020, only extension was given to the companies to hold the AGM after the due date.</i> 5. <i>Extension was given to the companies to hold the AGM and in the form it is ticked as No.</i> 6. <i>Remuneration booked in the financials is 12 lakhs instead of 24 lakhs.</i>
16	Form AO C-4	FY 2020-21	07.11.2021	30.11.2021	30.12.2021	22.03.2022	-	-	Balance sheet and other documents filed by the company with registrar for the financial year 2020-21. Attachments: 1. Auditors report alongwith Balance



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									sheet and notes to accounts 2. Directors report 3. ROC Extension Letter Remarks: 1. 15th AGM is mentioned in Directors report instead of 16th AGM, clerical mistake has happened. 2. Due to covid no additional fees was required to pay for the delay in filing the form
17	Form AO C-4 XBRL	FY 2021-22	02.09.2022	30.09.2022	30.10.2022	11.11.2022	12 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2021-22. Attachments: 1. XML file 2. PDF of XML file Remarks: 1. 16th AGM is mentioned in Directors report reflecting in the pdf version of xml file instead of 17th AGM, clerical



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>mistake has happened.</i> <i>2. One BM date 30.03.2022 not recorded in the directors report reflecting in pdf of xml file attached in the form.</i> <i>3. 12 days of delay in filing the form.</i> <i>4. This form is reflecting twice in ROC search with date of filing as 21.09.2023 with the same details.</i>
18	Form AO C-4 XBRL	FY 2022-23	03.09.2023	30.09.2023	30.10.2023	16.11.2023	17 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2022-23. Attachments: 1. XML file 2. PDF of XML file Remarks: <i>1. 17th AGM is mentioned in Directors report reflecting in the pdf version of xml file instead of 18th AGM, clerical</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
									<i>mistake has happened.</i> <i>2. 17 days of delay in filing the form.</i>
19	Form AO C-4 XBRL	FY 2023-24	03.09.2024	30.09.2024	30.10.2024	10.11.2024	11 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2023-24. Attachments: 1. XML file 2. PDF of XML file Remarks: <i>1. 18th AGM is mentioned in Directors report reflecting in the pdf version of xml file instead of 19th AGM, clerical mistake has happened.</i> <i>2. Five BM dated 12.05.2023, 24.07.2023, 16.11.2023, 17.11.2023 have not been taken into record in the directors report reflecting in the pdf file of xml.</i> <i>3. 11 days of delay in filing the form.</i>



Sr. No.	Form No.	Financial year	Date of financial statements approval / Board Report Approval / Signing by Auditors	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Loans and advances due by directors/ other officers of the company	Particulars of the form including Attachments and Remarks
20	Form AOC-4 XBRL	FY 2024-25	03.09.2025	30.09.2025	30.10.2025	04.02.2026	97 days	-	Balance sheet and other documents filed by the company with registrar for the financial year 2024-25. Attachments: 1. XML file 2. Board's report, AOC-1, AOC-2 3. Standalone Financial Statements 4. Consolidated Financial Statements 5. Consolidated financials error 6. MR-3 report <i>Remarks: 97 days of delay in filing the form.</i>

AUDITOR'S QUALIFICATIONS IN THE FINANCIAL STATEMENTS OF THE COMPANY:

Qualifications, adverse remarks or emphasis of matters as reported by the statutory auditors of the Company are as follows:

Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
1	For the period starting from 24.02.2006 to 31.03.2006	Observations of the Auditors on the Accounts for the financial year under	There were no such unfavorable remark in the CARO report attached in the form.	Applicable



Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
		review are explained wherever required in the notes to the Accounts, and does not require further explanation		
2	2006-07	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
3	2007-08	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
4	2008-09	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
5	2009-10	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the	There were no such unfavorable remark in the CARO report attached in the form.	Applicable



Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
		Accounts, and does not require further explanation		
6	2010-11	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
7	2011-12	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
8	2012-13	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
9	2013-14	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable



Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
10	2014-15	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
11	2015-16	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
12	2016-17	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
13	2017-18	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
14	2018-19	Observations of the Auditors on the Accounts for the	There were no such unfavorable remark in the	Applicable



Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
		financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	CARO report attached in the form.	
15	2019-20	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
16	2020-21	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
17	2021-22	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
18	2022-23	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in	There were no such unfavorable remark in the CARO report attached in the form.	Applicable



Sr. No.	Financial Year	Qualifications, adverse remarks or emphasis of matters	Unfavorable remark in CARO Report	Whether Applicable or Not Applicable
		the notes to the Accounts, and does not require further explanation		
19	2023-24	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable
20	2024-25	Observations of the Auditors on the Accounts for the financial year under review are explained wherever required in the notes to the Accounts, and does not require further explanation	There were no such unfavorable remark in the CARO report attached in the form.	Applicable

FORM 20B/MGT-7/MGT-7A:



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
1.	Form 20B	For the period starting from 24.02.2006 to 31.03.2006	29.09.2006	28.11.2006	15.05.2009	899 days	-	Complied	Filing of Annual return for the period starting from 24.02.2006 to 31.03.2006 Attachments: Annual return alongwith list of shareholder and directors list Remarks: <i>CIN mentioned in the annual return is unlisted and in the form it is reflected as listed</i> <i>In the annual return it is mentioned that the shares are not listed on any stock exchange, but in the form listed CIN is mentioned which stands that shares are listed, some clerical error with the form is there as the shares of the</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>company are not listed on any stock exchange earlier.</i> <i>3. Annual return, list of shareholder and Directors list are not physically signed by the directors.</i> <i>4. Ledger folio number missing in the list of shareholder</i> <i>5. 899 days of delay in filing the form.</i>
2	Form 20B	FY 2006-07	28.09.2007	27.11.2007	15.05.2009	535 days	-	Complied	Filing of Annual return for the FY 2006-07 Attachments: Annual return alongwith list of shareholder and directors list Remarks: <i>1. CIN mentioned in the annual return is unlisted and in the</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>form it is reflected as listed.</i> <i>2. In the annual return it is mentioned that the shares are not listed on any stock exchange, but in the form listed Cin is mentioned which stands that shares are listed, some clerical error with the form is there as the shares of the company are not listed on any stock exchange earlier.</i> <i>3. Annual return, list of shareholder and Directors list are not physically signed by the directors.</i> <i>4. Ledger folio number missing in the list of shareholder</i> <i>5. 535 days of delay in filing the form.</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
3	Form 20 B	FY 2007-08	30.09.2008	29.11.2008	15.05.2009	167 days	-	Complied	Filing of Annual return for the FY 2007-08 Attachments: Annual return alongwith list of shareholder and directors list Remarks: 1. CIN mentioned in the annual return is unlisted and in the form it is reflected as listed 6. In the annual return it is mentioned that the shares are not listed on any stock exchange, but in the form listed Cin is mentioned which stands that shares are listed, some clerical error with the form is there as the shares of the company are not



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>listed on any stock exchange earlier.</i> <i>2. Annual return, list of shareholder and Directors list are not physically signed by the directors.</i> <i>3. Ledger folio number missing in the list of shareholder</i> <i>4. 167 days of delay in filing the form.</i>
4	Form 20 B	FY 2008-09	30.09.2009	29.11.2009	15.12.2011	746 days	-	Company has not complied with the Section 12(1) of the Companies Act 1956, as the number of members should be minimum	Filing of Annual return for the FY 2008-09 Attachments: Annual return alongwith list of shareholder and directors list Remarks: <i>1. Annual return, list of shareholder and Directors list are not physically signed by the directors.</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								7 as per the Act, whereas company has correct list of shareholders and proper board meeting minutes and statutory records with them.	<i>2. Ledger folio number missing in the list of shareholder</i> <i>3. List of shareholders has only 5 shareholders and also the list of shareholders attached mentioned wrong names of the shareholders as the acquisition was done in may 2009 and it is a part of FY 2009-10 and not 2008-09.</i> <i>4. Details of ceased directors not mentioned in the form.</i> <i>5. Company has proper list of shareholders in record, only the wrong one has been attached in the form.</i> <i>6. 746 days of delay in filing the form.</i>
5	Form 20 B	FY 2009-10	30.09.2010	29.11.2010	15.12.2011	381 days	-	Company has not complied	Filing of Annual return for the FY 2009-10



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								with the Section 12(1) of the Companies Act 1956, as the number of members should be minimum 7 as per the Act, whereas company has correct list of shareholders and proper board meeting minutes and statutory records with them.	Attachments: Annual return alongwith list of shareholder and directors list Remarks: <i>Annual return, list of shareholder and Directors list are not physically signed by the directors.</i> <i>Ledger folio number missing in the list of shareholder</i> <i>List of shareholders has only 5 shareholders instead of 7.</i> <i>Company has proper list of shareholders in record, only the wrong one has been attached in the form.</i> <i>381 days of delay in filing the form.</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
6	Form 20 B	FY 2010-11	30.09.2011	29.11.2011	28.12.2011	29 days	-	Company has not complied with the Section 12(1) of the Companies Act 1956, as the number of members should be minimum 7 as per the Act, whereas company has correct list of shareholders and proper board meeting minutes and statutory	Filing of Annual return for the FY 2010-11 Attachments: Annual return alongwith list of shareholder and directors list Remarks: <i>Annual return, list of shareholder and Directors list are not physically signed by the directors.</i> <i>Ledger folio number missing in the list of shareholder</i> <i>List of shareholders has only 5 shareholders instead of 7.</i> <i>Company has proper list of shareholders in record, only the wrong one has been</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								records with them.	<i>attached in the form.</i> <i>5. 29 days of delay in filing the form.</i>
7	Form 20 B	FY 2011-12	30.09.2012	29.11.2012	14.11.2014	715 days	Yes Transfers have been done but the details of transfer are not included in the annual return attached in the form.	1. Company has not complied with the Section 12(1) of the Companies Act 1956, as the number of members should be minimum 7 as per the Act, whereas company has	Filing of Annual return for the FY 2011-12 Attachments: Annual return Remarks: <i>1. Annual return is not physically signed by the directors.</i> <i>2. Wrong number of shares and amount has been reported in the form as no allotment was done in the reporting financial year, whereas actual allotment of shares was done in the FY 2012-13.</i> <i>3. There are only 3 shareholders mentioned in the</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								correct list of shareholders and proper board meeting minutes and statutory records with them. 2. Company has not complied with the provisions of Section 383A of the Companies Act, 1956, as	<i>annual return instead of 7 shareholders.</i> <i>4. Transfer of shares details not mentioned in the annual return.</i> <i>5. Details of resignation of Savita Dilip Kabra and Premnarayan Kabra from the directorship of the company not recorded in the form in section V.</i> <i>6. Company has proper list of shareholders in record, only the wrong one has been attached in the form.</i> <i>7. Company has a proper PCS certificate for the FY 2011-12, only the form has not been filed by them.</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								Form 66 for the FY 2011-12 has not filed by the company, whereas company has the PCS certificate for the FY 2011-12 in their records.	8. 715 days of delay in filing the form.
8	Form 20 B	FY 2012-13	30.09.2013	29.11.2013	30.12.2014	396 days	-	Company has not complied with the Section 12(1) of the Companies	Filing of Annual return for the FY 2012-13 Attachments: Annual return Remarks:



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								s Act 1956, as the number of members should be minimum 7 as per the Act, whereas company has correct list of shareholders and proper board meeting minutes and statutory records with them.	1. Annual return is not physically signed by the directors. 2. There are only 2 shareholders mentioned in the annual return. 3. Transfer of shares details not mentioned in the annual return. 4. Details of director namely Debasish Pal has not been recorded in the annual return attached in the form. 5. Details of resignation of Sandhya Pawan Kabra from the directorship of the company not recorded in the form in section V. 6. Company has proper list of shareholders in



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>record, only the wrong one has been attached in the form.</i> 7. 396 days of delay in filing the form.
9	Form 20 B	FY 2013-14	30.09.2014	29.11.2014	24.03.2017	846 days	Yes Transfers have been done but the details of transfer are not included in the annual return attached in the form.	Company has not complied with the Section 12(1) of the Companies Act 1956, as the number of members should be minimum 7 as per the Act, whereas company has correct list of shareholders and	Filing of Annual return for the FY 2013-14 Attachments: Annual return Remarks: 1. There are only 3 shareholders mentioned in the annual return, instead of 7. 2. Transfer of shares details not mentioned in the annual return. 3. Company has proper list of shareholders in record, only the wrong one has been attached in the form.



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
								proper board meeting minutes and statutory records with them.	4. 846 days of delay in filing the form.
10	Form MG T-7	FY 2014-15	30.09.2015	29.11.2015	17.03.2017	474 days	Yes Transfer has been done but the details of transfer are not included in the annual return attached in the form.	-	Filing of Annual return for the FY 2014-15 Attachments: List of Shareholder Remarks: 1. Transfer of shares details not mentioned in the form. 2. List of shareholders is not properly taken on the letter head of the company and is also unsigned. 3. Description of Main Activity group is mentioned as Manufacturing



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>whereas the company is into trading business.</i> <i>4. The designations of Shishir Dilip Kabra and Dhruv Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>5. 474 days of delay in filing the form.</i>
11	Form MG T-7	FY 2015-16	30.09.2016	29.11.2016	02.12.2016	3 days	-	-	Filing of Annual return for the FY 2015-16 Attachments: List of Shareholders Remarks: <i>1. List of shareholders is not properly taken on the letter head of the</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>company and is also unsigned.</i> <i>2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business.</i> <i>3. The designations of Shishir Dilip Kabra and Dhruv Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>4. 3 days of delay in filing the form.</i>
12	Form MG T-7	FY 2016-17	30.09.2017	29.11.2017	05.07.2018	118 days	-	-	Filing of Annual return for the FY 2016-17 Attachments: List of Shareholders



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									Remarks: 1. List of shareholders is not properly taken on the letter head of the company and is also unsigned. 2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business. 3. The designations of Shishir Dilip Kabra and Dhruv Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form. 4. 118 days of delay in filing the form.



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
13	Form MGT-7	FY 2017-18	29.09.2018	28.11.2018	04.01.2019	37 days	-	-	Filing of Annual return for the FY 2017-18 Attachments: List of Shareholders Remarks: <i>List of shareholders is not properly taken on the letter head of the company and is also unsigned.</i> <i>Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business.</i> <i>The designations of Shishir Dilip Kabra and Dhruv Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director,</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>clerical mistake happened in the form.</i> <i>4. 37 days of delay in filing the form.</i>
14	Form MG T-7	FY 2018-19	30.09.2019	29.11.2019	03.01.2020	35 days	19,950 shares transferred from Debashish Pal to Aanchal Kabra on 01.04.2018.	-	Filing of Annual return for the FY 2018-19 Attachments: List of Shareholders Remarks: <i>1. List of shareholders is not properly taken on the letter head of the company and is also unsigned.</i> <i>2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business.</i> <i>3. The designations of Shishir Dilip Kabra and Dhruv Dilip Kabra are shown</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>4. Details of transfer of shares from Ashish, Veena and Harishankar are not mentioned in the form.</i> <i>5. One BM dated 17.01.2018 has not been recorded in the form.</i> <i>6. 35 days of delay in filing the form.</i>
15	Form MG T-7	FY 2019-20	31.12.2020	01.03.2021	17.03.2021	16 days	-	-	Filing of Annual return for the FY 2019-20 Attachments: - List of Shareholders - ROC Extension letter



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									3. UDIN generation letter <i>Remarks:</i> 1. List of shareholders is not properly taken on the letter head of the company and is also unsigned. 2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business. 3. The due date of holding AGM mentioned in the form is 31.12.2020 whereas the due date of holding AGM was 30.09.2020, only extension was given to the companies to hold



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>the AGM after the due date.</i> <i>4. Extension was given to the companies to hold the AGM and in the form it is ticked as No.</i> <i>5. 16 days of delay in filing the form, but due to covid no additional fees was required to pay for the delay in filing the form.</i> <i>6. The designations of Shishir Dilip Kabra and Debasish pal are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>7. One BM dated 02.09.2019 have</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>not been taken into record by the company.</i>
16	Form MG T-7	FY 2020-21	30.11.2021	29.01.2022	22.03.2022	52 days	-	-	Filing of Annual return for the FY 2020-21 Attachments: - List of Shareholders - ROC Extension letter - UDIN generation letter Remarks: - List of shareholders is not properly taken on the letter head of the company and is also unsigned. - Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business.



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									3. 52 days of delay in filing the form, but due to covid no additional fees was required to pay for the delay in filing the form. 4. The designations of Shishir Dilip Kabra and Debasish pal are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.
17	Form MGT-7	FY 2021-22	30.09.2022	29.11.2022	28.11.2022	-	-	-	Filing of Annual return for the FY 2021-22 Attachments: - List of Shareholders - MGT-8 - UDIN generation letter Remarks:



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									1. List of shareholders is not properly taken on the letter head of the company and is also unsigned. 2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business. 3. The Number of directors at the beginning of the year is mentioned as 2 instead of 3, clerical mistake happened in form. 4. Three BM dated 09.04.2021, 14.06.2021 and 04.02.2022 have not been taken into record by the company. 5. The designations of Shishir Dilip Kabra and Debasish pal are shown as



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>6. This form is reflecting twice in ROC search with additional date of filing as 02.10.2023 with the same details.</i>
18	Form MGT-7	FY 2022-23	30.09.2023	29.11.2023	24.11.2023	-	-	-	Filing of Annual return for the FY 2022-23 Attachments: 1. List of Shareholders 2. MGT-8 3. UDIN generation letter Remarks: <i>1. List of shareholders is not properly taken on the letter</i>



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>head of the company and is also unsigned.</i> <i>2. Description of Main Activity group is mentioned as Manufacturing whereas the company is into trading business.</i> <i>3. The designations of Shishir Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.</i> <i>4. One BM dated 13.02.2023 has not been recorded in the form.</i> <i>5. This form is reflecting twice in ROC search with additional date of</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>filing as 08.01.2024 with the same details</i>
19	Form MGT-7	FY 2023-24	30.09.2024	29.11.2024	12.11.2024	-	-	-	Filing of Annual return for the FY 2023-24 Attachments: 1. List of Shareholders 2. MGT-8 3. UDIN generation letter Remarks: <i>1. List of shareholders is not properly taken on the letter head of the company and is also unsigned. 2. Five BM dated 12.05.2023, 24.07.2023, 16.11.2023, 17.11.2023 and 11.03.2024 and one EGM dated 16.11.2023 have not been recorded in the form.</i>



Sr . No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									3. The designations of Shishir Dilip Kabra are shown as executive directors in the composition of board section of the form instead of non executive director, clerical mistake happened in the form.
20	Form MGT-7	FY 2024-25	30.09.2025	29.11.2025	31.01.2026	63 days	Yes transfer has been done and details of which in the form of excel sheet is attached in the form.		Filing of Annual return for the FY 2024-25 Attachments: 1. List of Shareholders 2. List of Directors 3. Registered office photographs 4. Transfer details in excel 5. MGT-8 Remarks: 1. The description of main activity group and business activity description is



Sr. No.	Form No.	Financial year	Date of AGM/ Date of Event	Due date of Filing	Date of Filing	Delay (in days)	Details of shares transfers, if any	Whether the company has made compliances in respect of applicable provision of the Companies Act, 1956 and Companies Act, 2013 during the year	Particulars of the form including Attachments and Remarks
									<i>mentioned wrong in the form, as the company does not deal in repair of motor vehicles and motorcycles, instead they deal in agricultural products.</i> <i>2. The photos attached of registered office attached in the form are not geo tagged.</i> <i>3. The excel sheet attached in the form for transfer details could not be opened due to system error.</i> <i>4. 63 days of delay in filing the form.</i>

LIST OF SHAREHOLDERS AS PER LATEST ANNUAL RETURN (MARCH 31, 2025)

Sr. no	Name of Shareholders	Type of Share	No. of Shares	Face Value per Share	Total Paid-up Amount (Rs.)
--------	----------------------	---------------	---------------	----------------------	----------------------------



1	Mr. Shishir D Kabra	Equity Shares	8,79,000	10	87,90,000
2	Mr. Dhruv D Kabra	Equity Shares	8,79,000	10	87,90,000
3	Ms. Anchal Dhruv Kabra	Equity Shares	19,960	10	1,99,600
4	Ms. Savita Kabra	Equity Shares	10	10	100
5	Ms. Ruchira Jhunjhunwala	Equity Shares	10	10	100
6.	Ms. Janhvi Kabra	Equity Shares	10	10	100
7.	Ms. Harshita Kabra	Equity Shares	10	10	100
	TOTAL		17,78,000	10	1,77,80,000

LIST OF SHAREHOLDERS AS ON THE DATE OF SIGNING THIS SECRETARIAL DUE DILIGENCE REPORT

Sr. no	Name of Shareholders	Type of Share	No. of Shares	Face Value per Share	Total Paid-up Amount (Rs.)
1	Mr. Shishir D Kabra	Equity Shares	79,11,000	10	7,91,10,000
2	Mr. Dhruv D Kabra	Equity Shares	79,11,000	10	7,91,10,000
3	Ms. Anchal Dhruv Kabra	Equity Shares	1,79,640	10	17,96,400
4	Ms. Ruchira Jhunjhunwala	Equity Shares	90	10	900
5	Ms. Harshita Pawan Kabra	Equity Shares	90	10	900
6.	Ms. Janhavi Pawan Kabra	Equity Shares	90	10	900
7.	Mr. Akshar Pawan Kabra	Equity Shares	90	10	900
	TOTAL		1,60,02,000	10	16,00,20,000

Note: Company is yet to file the Annual return forms namely AOC-4 XBRL, CSR-2 and MGT-7 for the FY 2025-26.



ANNEXURE-VII

MATERIAL EVENT BASED COMPLIANCES BY THE COMPANY:

The following is a detailed list of key compliances prescribed under the Companies Act, 2013 (as amended from time to time), along with the Company's applicability and status with respect to each of these requirements:

Sr. No.	Compliance	Relevant Section(s) / Rule(s)	Applicability Remarks	Whether Applicable or Not Applicable (Whether complied, If applicable)
1	Form MGT-8	Section 92(2), Rule 11(2) of the Companies (Management and Administration) Rules, 2014	Applicable to listed companies and companies having paid-up share capital of ₹10 crore or more or turnover of ₹50 crore or more.	Applicable and complied
2	Appointment of Internal Auditor	Section 138, Rule 13 of the Companies (Accounts) Rules, 2014	Applicable to: (a) Listed Companies; (b) Unlisted Public Companies meeting thresholds; (c) Private Companies meeting thresholds as prescribed.	Applicable and complied
3	Appointment of Whole-Time Company Secretary	Section 203(1), Rule 8 & 8A of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014	Mandatory for every listed company and every other public company with paid-up share capital of ₹10 crore or more.	It is not applicable but since the company is going for SME IPO and will get listed in near future, so Whole Time Company Secretary has been appointed on board.
4	Appointment of Independent Director	Sections 149(4) & 149(6), Rule 4 of the Companies	Every listed public company and unlisted public company meeting thresholds (paid-up share capital ₹10	Company was applicable to appoint independent director in the FY 2021-22 as their turnover exceeded beyond



Sr. No.	Compliance	Relevant Section(s) / Rule(s)	Applicability Remarks	Whether Applicable or Not Applicable (Whether complied, If applicable)
		(Appointment and Qualification of Directors) Rules, 2014	crore or more; turnover ₹100 crore or more; or outstanding loans/debentures/deposits exceeding ₹50 crore).	Rs. 100 crore, but the company did not appointed independent directors on board till FY 2024-25. Further, the independent directors were actually appointed in FY 2025-26 for the purpose of complying for the upcoming IPO, the details of the same are included in directors section in this report. Further, for the rectifying the non-compliance happened the company has filed an adjudication application in the form GNL-1 vide SRN AC4248770 dated June 28, 2026, which is approved as on the signing of this report.
5	Appointment of Woman Director	Section 149(1) (Proviso), Rule 3 of the Companies (Appointment and Qualification of Directors) Rules, 2014	Every listed company and every other public company having paid-up share capital of ₹100 crore or more or turnover of ₹300 crore or more.	Company was applicable to appoint women director in the FY 2023-24 as their turnover exceeded beyond Rs. 300 crore, but company did not appointed women director on board till FY 2024-25. Further, the women director was actually appointed in FY 2025-26 for the purpose of complying for the upcoming IPO, the details of the same are included in directors section in this report. Further, for the rectifying the non-compliance happened the company has filed an adjudication application in the form GNL-1 vide SRN AC4248768 dated June 28, 2026, which is approved as on the signing of this report.
6	Cost Audit	Section 148, Rule 3 of the Companies (Cost Records and Audit) Rules, 2014	Applicable to companies engaged in specified sectors as per Table A and B of the Rules, subject to turnover thresholds.	Not Applicable



Sr. No.	Compliance	Relevant Section(s) / Rule(s)	Applicability Remarks	Whether Applicable or Not Applicable (Whether complied, If applicable)
7	Secretarial Audit	Section 204, Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014	Mandatory for: (a) Listed Companies; (b) Public Companies with paid-up share capital of ₹50 crore or more; or turnover of ₹250 crore or more.	Company was applicable for conducting secretarial audit in the FY 2024-25 as their turnover exceeded beyond Rs. 250 crore for the FY 2023-24, and same has been complied and attached in the board's report of FY 2024-25. Further the same is applicable for FY 2025-26 as well and will be a part of Board's Report filed for the FY 2025-26.
8	Corporate Social Responsibility (CSR)	Section 135, Companies (CSR Policy) Rules, 2014	Applicable where net worth ≥ ₹500 crore, turnover ≥ ₹1,000 crore or net profit ≥ ₹5 crore during any financial year. CSR Committee and spending obligations apply.	Applicable for FY 2025-26. Further the company was required to spend an amount of Rs. 14.28 lakhs under CSR, to which the company has spent an amount of Rs. 11 lakhs with a shortfall of Rs. 3.28 lakhs under CSR. The company is under the process of transferring the unspent funds as per Schedule VII of the Section 135 (5) of the Companies Act, 2013.

COMPLIANCES W.R.T VARIOUS COMMITTEES:

Sr. No.	Compliance	Relevant Section(s) / Rule(s)	Applicability	Whether Applicable or Not Applicable (Whether complied, If applicable)
1	Audit Committee	Section 177, Rule 6 of the Companies (Meetings of Board and its Powers) Rules, 2014	Mandatory for every listed public company and every public company with paid-up share capital ≥ ₹10 crore; turnover ≥ ₹100 crore; or outstanding loans/borrowings/debentures exceeding ₹50 crore.	Company was applicable to constitute audit committee in the FY 2021-22 as their turnover exceeded beyond Rs. 100 crore, but the company did not constituted the same on board till FY 2024-25. The audit committee was actually constituted in FY 2025-26 on May 01, 2026, for the purpose of complying for the upcoming IPO. Further, for the rectifying the non-compliance happened the company has filed an adjudication application in the form GNL-1 vide SRN AC4248772 dated June 28, 2026, which is approved as on the signing of this report.



Sr. No.	Compliance	Relevant Section(s) / Rule(s)	Applicability	Whether Applicable or Not Applicable (Whether complied, If applicable)
2	Nomination and Remuneration Committee (NRC)	Section 178(1), Rule 6 of the Companies (Meetings of Board and its Powers) Rules, 2014	Same applicability as the Audit Committee — mandatory for listed public companies and public companies meeting the thresholds above.	Company was applicable to constitute nomination and remuneration committee in the FY 2021-22 as their turnover exceeded beyond Rs. 100 crore, but the company did not constituted the same on board till FY 2024-25. The nomination and remuneration committee was actually constituted in FY 2025-26 on May 01, 2026 for the purpose of complying for the upcoming IPO. Further, for the rectifying the non-compliance happened the company has filed an adjudication application in the form GNL-1 vide SRN AC4248772 dated June 28, 2026, which is approved as on the signing of this report.
3	Stakeholders Relationship Committee (SRC)	Section 178(5)	Mandatory for every company with more than 1,000 shareholders, debenture holders, deposit holders and any other security holders at any time during a financial year.	It is not applicable but since the company is going for SME IPO and will get listed in near future, so Stakeholders Relationship committee has been constituted duly on board.
4	Vigil Mechanism	Section 177(9) & (10), Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014	Mandatory for every listed company and companies which accept deposits from the public or which have borrowed money from banks and public financial institutions in excess of ₹50 crore.	Not Applicable
5	Corporate Social Responsibility (CSR) Committee	Section 135(1), Companies (CSR Policy) Rules, 2014	Required for companies having net worth ≥ ₹500 crore, turnover ≥ ₹1,000 crore or net profit ≥ ₹5 crore during any financial year.	It is not applicable but since the company is going for SME IPO and will get listed in near future, so Corporate Social Responsibility committee has been constituted duly on board.



ANNEXURE-VIII

ACCEPTANCE OF DEPOSITS FROM MEMBERS/PUBLIC COMPLAINTS:

DPT FORMS COMPLIANCE:

Sr. No.	Form	Financial Year	Date of Event	Due date of Filing	Date of Filing	Delay in days	Particulars of the form including Attachments and Remarks
1	DPT-3	One time Return (April 01, 2014 to March 31, 2019)	31.05.2019	31.05.2019	24.12.2020	597 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. <i>Remarks: 597 days of delay in filing the form.</i>
2	DPT-3	Annual Basis (FY 2018-19)	30.06.2019	30.06.2019	27.12.2025	2371 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. <i>Remarks: 2371 days of delay in filing the form.</i>
3	DPT-3	Annual Basis (FY 2019-20)	30.06.2020	30.06.2020	09.01.2021	193 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. <i>Remarks: 193 days of delay in filing the form.</i>
4	DPT-3	Annual Basis (FY 2020-21)	30.06.2021	30.06.2021	27.12.2025	1641 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. <i>Remarks: 1641 days of delay in filing the form.</i>



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form	Financial Year	Date of Event	Due date of Filing	Date of Filing	Delay in days	Particulars of the form including Attachments and Remarks
5	DPT-3	Annual Basis (FY 2021-22)	30.06.2022	30.06.2022	27.12.2025	1276 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. Remarks: 1276 days of delay in filing the form.
6	DPT-3	Annual Basis (FY 2022-23)	30.06.2023	30.06.2023	26.07.2023	26 days	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014. Remarks: 26 days of delay in filing the form.
7	DPT-3	Annual Basis (FY 2023-24)	30.06.2024	30.06.2024	29.06.2024	-	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014.
8	DPT-3	Annual Basis (FY 2024-25)	30.06.2025	30.06.2025	30.06.2025	-	Return of deposits: Particulars of transactions by a company not considered as deposit as per rule 2 (1) (c) of the Companies (Acceptance of Deposit) Rules, 2014.

Note: The company is yet to file the DPT-3 form for the FY 2025-26.

Sr. No.	Form	Financial Year	Delay in days	Attachments and Remarks
1	DPT-4 (Repealed)	NA		

Note: DPT-3 must be filed even if the company has no deposits but has transactions which may not be considered deposits (e.g., loans from directors, advances, etc.). It acts as an annual compliance for Return of Deposit and Exempted Deposits.

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Sr. No.	Compliance Requirement	Relevant Section(s) / Rule(s)	Applicability	Compliance Status
1	Acceptance of Deposits from Members/Public	Section 73 to 76, Companies (Acceptance of Deposits) Rules, 2014	Applicable to all companies except: (a) banking companies, (b) NBFCs registered with RBI, (c) any other company notified by the Central Government. Companies may accept deposits from members subject to compliance with prescribed conditions; acceptance from public allowed only for eligible public companies.	No deposits accepted beyond exempted categories

ANNEXURE-IX

COMPLAINTS RELATED TO RESOLUTIONS AND AGREEMENTS TO BE FILED UNDER SECTION 117 OF THE COMPANIES ACT, 2013 AND OTHER E-FORMS:

FORM 23/ MGT-14:

Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
1	Form MGT-14	1. Section 179(3) of the Companies Act 2013 2. Section 179(3) of the Companies Act 2013	BM: 03.09.2024	03.10.2024	28.10.2024	25 days	1. Board Resolution filed for Approval of financial statement for financial year 2023-24. 2. Board Resolution filed for Approval of Directors report for financial year 2023-2024 Attachments: Board Resolution Remarks: <i>25 days of delay in filing the form.</i>
2	Form MGT-14	1. Section 196 of the Companies Act 2013 2. Section 196 of the Companies Act 2013	EGM: 08.05.2025	07.06.2025	04.06.2025	-	1. Special Resolution filed To consider and approve the appointment of Mr. Dhruv Kabra (DIN: 02211776) as Whole Time



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Director. 2. Special resolution filed to redesignate Mr. Shishir Kabra (DIN: 02211767), as a Managing director of the Company Attachments: 1. Board Resolution for Shishir and Dhruv 2. EGM resolution for Shishir and Dhruv <i>Remarks: In the resolutions the agenda has been mentioned as appointment of Mr. Dhruv Dilip Kabra as the WTD instead of Change in Designation, whereas in the form DIR-12 change in designation is ticked, clerical mistake happened in the resolutions alongwith explanatory statement attached in the form.</i>
3	Form MGT-14	Section 179(3) of the Companies Act 2013	BM: 28.03.2025	27.04.2025	21.01.2026	269 days	Board Resolution filed for the Appointment of M/s. Dularesh K Jain and Associates as an Internal Auditor of the



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Company for the FY 2024-25. Attachments: 1. Board Resolution 2. Intimation to internal auditor 3. Consent Letter to act as Internal Auditor 4. Appointment Letter <i>Remarks: 269 days of delay in filing the form.</i>
4	Form MGT-14	Section 179(3) of the Companies Act 2013	BM: 20.01.2026	19.02.2026	27.01.2026	-	Board Resolution filed for the Appointment of M/s. Dularesh K Jain and Associates as an Internal Auditor of the Company for the FY 2025-26. Attachments: 1. Board Resolution 2. Intimation to internal auditor 3. Consent Letter to act as Internal Auditor 4. Appointment Letter
5	Form MGT-14	Section 203 of the Companies Act 2013	BM: 01.11.2025	01.12.2025	28.01.2026	58 days	Board Resolution filed for appointment of Mr. Mahesh Dhanesh Maloo as the CFO of the Company. Attachments: 1. Board Resolution



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							2. Other attachments which includes consent letter, appointment letter, aadhar copy and PAN copy. Remarks: 58 days of delay in filing the form.
6	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 06.09.2015	06.10.2015	23.01.2026	3762 days	1. Board Resolution filed for approving annual accounts for the FY 2014-15 2. Board Resolution filed for approving draft directors report for FY 2014-15. Attachments: Board Resolution Remarks: 1. 3762 days of delay in filing the form. 2. Contact number and email id missing on the letterhead of the company.
7	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 17.09.2016	17.10.2016	23.01.2026	3385 days	1. Board Resolution filed for approving annual accounts for the FY 2015-16 2. Board Resolution filed for approving draft directors report for FY 2015-16.



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: Board Resolution Remarks: 1. 3385 days of delay in filing the form. 2. Contact number and email id missing on the letterhead of the company.
8	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 29.09.2017	29.10.2017	23.01.2026	3008 days	1. Board Resolution filed for approving annual accounts for the FY 2016-17 2. Board Resolution filed for approving draft directors report for FY 2016-17. Attachments: Board Resolution Remarks: 1. 3008 days of delay in filing the form. 2. Contact number and email id missing on the letterhead of the company.
9	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 24.08.2018	23.09.2018	23.01.2026	2679 days	1. Board Resolution filed for approving annual accounts for the FY 2017-18 2. Board Resolution filed for approving draft directors report for FY 2017-18.



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: Board Resolution Remarks: 1. 2679 days of delay in filing the form. 2. Contact number and email id missing on the letterhead of the company.
10	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 29.09.2019	29.10.2019	23.01.2026	2278 days	1. Board Resolution filed for approving annual accounts for the FY 2018-19 2. Board Resolution filed for approving draft directors report for FY 2018-19. Attachments: Board Resolution Remarks: 2278 days of delay in filing the form.
11	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 23.12.2020	22.01.2020	23.01.2026	2193 days	1. Board Resolution filed for approving annual accounts for the FY 2019-20 2. Board Resolution filed for approving draft directors report for FY 2019-20. Attachments: Board Resolution



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							<i>Remarks: 2193 days of delay in filing the form.</i>
12	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 17.11.2021	17.12.2021	23.01.2026	1498 days	1. Board Resolution filed for approving annual accounts for the FY 2020-21 2. Board Resolution filed for approving draft directors report for FY 2020-21. Attachments: Board Resolution <i>Remarks: 1498 days of delay in filing the form.</i>
13	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 02.09.2022	02.10.2022	23.01.2026	1209 days	1. Board Resolution filed for approving annual accounts for the FY 2021-22 2. Board Resolution filed for approving draft directors report for FY 2021-22. Attachments: Board Resolution <i>Remarks: 1209 days of delay in filing the form.</i>
14	Form MGT-14	1 & 2 Section 179(3) of the Companies Act 2013	BM: 03.09.2023	03.10.2023	23.01.2026	843 days	1. Board Resolution filed for approving annual accounts for the FY 2022-23 2. Board Resolution filed for approving draft directors



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							report for FY 2022-23. Attachments: Board Resolution <i>Remarks: 843 days of delay in filing the form.</i>
15	Form MGT-14	Section 180(1)(c) of the Companies Act 2013	EGM: 16.11.2023	16.12.2023	23.01.2026	769 days	Special Resolution filed for authorizing the board to Borrow money pursuant to Section 180(1)(c). Attachments: EGM Resolution <i>Remarks:</i> <i>1. 769 days of delay in filing the form.</i> <i>2. CIN and contact number is missing on the letterhead of the company on which special resolution has been taken.</i>
16	Form MGT-14	Pursuant to Section 12(5) of the Companies Act 2013	EGM: 25.10.2025	24.11.2025	31.10.2025	-	Filing of special resolution for shifting of registered office of the company w.e.f. 25.10.2025. Attachments: <i>1. EGM resolution alongwith explanatory statement</i>



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							2. Notice of EGM 3. Shorter consent notice
17	Form MGT-14	Pursuant to the provisions of the Companies Act 2013 and other applicable rules	BM: 24.01.2026	23.02.2026	09.02.2026	-	Filing of Board Resolution for Appointment of Mr. Dhruv Dilip Kabra as the Chairman of the Company w.e.f. 24.01.2026. Attachments: 1. Board Resolution 2. Consent letter to act as chairman
18	Form MGT-14	Pursuant to Section 146, 150 and 152 of the Companies Act 2013	BM: 24.01.2026	23.02.2026	01.02.2026	-	Filing of Board Resolution for appointment of Mr. Ashish Kumar Sodani as the non-executive independent director Attachments: 1. Board resolution 2. DIR-2, DIR-8, MBP-1 3. Declaration of independence
19	Form MGT-14	Pursuant to Section 146, 150 and 152 of the Companies Act 2013	EGM: 24.01.2026	23.02.2026	07.02.2026	-	Filing of Ordinary Resolution for appointment of Mr. Ashish Kumar Sodani as the non-executive independent director Attachments: 1. Board resolution 2. DIR-2, DIR-8, MBP-1 3. Declaration of independence



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							4. EGM resolution alongwith explanatory statement 5. Shorter notice consent
20	Form MGT-14	Pursuant to Section 146, 150 and 152 of the Companies Act 2013	BM: 07.03.2026	06.04.2026	11.03.2026	-	Filing of Board Resolution for appointment of Ms. Jyoti Keshavkumar Dubey as the non-executive independent director Attachments: 1. Board resolution 2. DIR-2, DIR-8, MBP-1 3. Declaration of independence
21	Form MGT-14	Pursuant to Section 146, 150 and 152 of the Companies Act 2013	EGM: 07.03.2026	06.04.2026	11.03.2026	-	Filing of Ordinary Resolution for appointment of Ms Jyoti Keshavkumar Dubey as the non-executive independent director Attachments: 1. Board resolution 2. DIR-2, DIR-8, MBP-1 3. Declaration of independence 4. EGM resolution alongwith explanatory statement 5. Shorter notice consent
22	Form MGT-14	Pursuant to Section 179 (1) of the companies act 2013	BM: 28.03.2025	27.04.2025	05.02.2026	284 days	Filing of Board Resolution for



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							appointment of M/S. Charul Agarwal practicing Company secretary as a Secretarial auditor of the Company for the financial Year 2024-25. Attachments: Board Resolution <i>Remarks: 284 days of delay in filing the form.</i>
23	Form MGT-14	1. Pursuant to Section 63 of the Companies Act 2013 2. Pursuant to Section 23, 26, 28, 32 and 62(1)(c) of the Companies Act 2013 3. Pursuant to Section 180(1)(a) of the Companies Act 2013 4. Pursuant to section 180(1)(c) of the Companies Act 2013 5. Pursuant to section 186(3) of the Companies Act 2013	EGM: 15.06.2026	15.07.2026	25.06.2026	-	1. Filing of Special Resolution to issue the bonus equity shares to the existing equity shareholders of the company. 2. Filing of special resolution for approval of IPO 3. Filing of special resolution for authorize to sell , lease or otherwise dispose undertaking of company pursuant to Section 180(1)(a). 4. Filing of special resolution for authorize the board to borrow money pursuant to Section 180(1)(c)



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							5. Filing of Special Resolution to authorize the board to make loans and give guarantee, provide security or make investments in excess of the prescribed limit as mentioned under section 186 of companies act 2013. Attachments: 1. Special resolution alongwith explanatory statement 2. Notice of EGM Remarks: shorter notice consent not attached in the form.
24	Form MGT-14	1. Pursuant to Section 63 of the Companies Act 2013 2. Pursuant to Section 23, 26, 28, 32 and 62(1)(c) of the Companies Act 2013 3. Pursuant to Section 180(1)(a) of the Companies Act 2013 4. Pursuant to section 180(1)(c) of the	BM: 15.06.2026	15.07.2026	25.06.2026	-	1. Filing of Board Resolution to issue the bonus equity shares to the existing equity shareholders of the company. 2. Filing of board resolution for approval of IPO 3. Filing of board resolution for authorize to sell , lease or otherwise dispose



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
		Companies Act 2013 5. Pursuant to section 186(3) of the Companies Act 2013					undertaking of company pursuant to Section 180(1)(a). 4. Filing of board resolution for authorize the board to borrow money pursuant to Section 180(1)(c) 5. Filing of board Resolution to authorize the board to make loans and give guarantee, provide security or make investments in excess of the prescribed limit as mentioned under section 186 of companies act 2013. Attachments: Board resolutions
25.	Form MGT-14	Pursuant to Section 63 of the Companies Act 2013	BM: 20.06.2026	20.07.2026	23.06.2026	-	Filing of board resolution for approval of issue and allotment of 14224000 bonus equity shares of the company. Attachments: 1. Board Resolution 2. List of Allottees.



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
26	Form MGT-14	Pursuant to Section 14(1) of the Companies Act 2013	EGM: 01.06.2026	01.07.2026	20.06.2026	-	Filing of special resolution for adoption of new set of AOA. Attachments: 1. EGM resolution 2. Altered MOA and AOA 3. Notice of EGM 4. Minutes of EGM 5. CTC of BR <i>Remarks: shorter notice consent not attached in the form.</i>
27.	MGT-14	Pursuant to Section 13 (1) of the Companies Act 2013	EGM: 01.06.2026	01.07.2026	19.06.2026	-	Filing of special resolution for adoption of new set of MOA of the company . Attachments: 1. EGM resolution 2. Altered MOA and AOA 3. Notice of EGM 4. Minutes of EGM 5. CTC of BR <i>Remarks: shorter notice consent not attached in the form.</i>
28.	Form MGT-14	Pursuant to Section 188(1) proviso of the Companies Act 2013	BM: 08.09.2025	08.10.2025	26.06.2026	261 days	Filing of Borad Resolution for approval of entering into a related party lease agreement with



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Anjayneya Ventures LLP. Attachment: Board resolution <i>Remarks: 261 days of delay in filing the form.</i>
29.	Form MGT-14	Pursuant to Section 188(1) proviso of the Companies Act, 2013	BM: 31.01.2024	01.03.2024	27.08.2026	909 days	Filing of Board Resolution for purchase of Property from Shree LTC Agro Sales Limited. Attachments: Board Resolution <i>Remarks: 909 days of delay in filing the form.</i>
30.	Form MGT-14	Pursuant to Section 188(1) proviso of the Companies Act, 2013	BM: 12.07.2023	11.08.2023	27.08.2026	1112 days	Filing of Board Resolution for purchase of Property from Shree Laxmi Trading Corporation. Attachments: Board Resolution <i>Remarks: 1112 days of delay in filing the form.</i>
31	Form MGT-14	Pursuant to Section 14(1) of the Companies Act, 2013	EGM: 17.08.2026	16.09.2026	24.08.2026	-	Filing of Special Resolution for alteration of articles of Association (AOA) of the Company by addition of a New article.



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: 1. EGM Resolution 2. Notice of EGM 3. Board Resolution 4. Consent of shorter notice of shareholder 5. Altered AOA 6. Minutes of EGM.
32	Form MGT-14	Pursuant to Section 179(3) of the Companies Act, 2013	BM: 31.07.2026	30.08.2026	26.08.2026	-	Filing of Board Resolution for Appointment of M/s. Nirmal Tiwari & Associates, Company Secretaries as Secretarial auditor of the Company for the financial Year 2025-26. Attachments: Board Resolution.
33.	Form MGT-14	Pursuant to Section 179(3) of the Companies Act, 2013	BM: 10.08.2026	09.09.2026	26.08.2026	-	Filing of Board Resolution for approval of audited standalone and consolidated financial statements for the Financial Year ended March 31, 2026. Attachment: Board Resolution.
34.	Form MGT-14	Pursuant to Section 179 (3) of the Companies Act, 2013	BM: 24.08.2026	23.09.2026	26.08.2026	-	1. Filing of Board Resolution for approval of Directors Report for the year 2025-26. 2. Filing of Board Resolution for approval of Initial Public Offer.



Sr. No.	Form No.	Section of the Companies Act, 2013/ 1956 under which resolution passed	Date of Event	Due date of Filing	Date of filing	Delay (in days)	Particulars of the form including Attachments and Remarks
							Attachments: Board Resolution
35.	Form MGT-14	Pursuant to Section 23, 26, 28, 32 and 62(1)(c) of the Companies Act 2013	AGM: 26.08.2026	25.09.2026	27.08.2026	-	Filing of Special Resolution for approving Initial Public Offer of the Company. Attachments: 1. Special Resolution alongwith explanatory statements 2. AGM Notice 3. Shorter consent notice of shareholders.

OTHER E-FORMS:

Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
1	Form INC-22 A	Form filed for active compliant status	15.06.2019	15.06.2019	15.06.2019	-	Attachment: Photograph of registered office address
2	Form DIR-3	DIN Application for Mr. Brijpal Singh Udayraj	-	-	20.09.2019	-	Attachments: 1. Proof of identity 2. Proof of residence 3. Board resolution
3	Form CFSS-2020	Form DPT-3 for FY 2018-19 one-time return filed through CFSS scheme	-	30.06.2021	13.05.2021	-	Attachments: 1. Challan of DPT-3



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
							2. Board Resolution.
4	Form MR-1	Return of Appointment filed for change in designation of Dhruv Dilip Kabra as the Whole Time Director of the company and fixing of his remuneration.	Date of Appointment 06.05.2025	05.07.2025	06.06.2025	-	Attachments: 1. Board Resolution 2. EGM Resolution <i>Remarks:</i> <i>In the resolutions the agenda has been mentioned as appointment of Mr. Dhruv Dilip Kabra as the WTD instead of Change in Designation, whereas in the form DIR-12 change in designation is ticked, clerical mistake happened in the resolutions alongwith explanatory statement attached in the form.</i>
5	Form MR-1	Return of Appointment filed for re-appointment of Shishir Dilip Kabra as the Managing Director of the company and fixing of his remuneration.	Date of Appointment 06.05.2025	05.07.2025	06.06.2025	-	Attachments: 1. Board Resolution 2. EGM Resolution
6	Form INC-33	E-MOA filed for increase in authorised share capital of the company	EGM: 12.06.2026	12.07.2026	24.06.2026	-	Attachments: 1. Subscribers sheet
7.	Form INC-33	E-MOA filed for adoption of new set of MOA of the company	EGM: 01.06.2026	01.07.2026	19.06.2026	-	Attachment: Altered MOA



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
8.	Form INC-34	E-AOA filed for adoption of new set of AOA of the company	EGM: 01.06.2026	01.07.2026	20.06.2026	-	Attachment: Altered AOA
9.	Form GNL-1	Compounding application filed in the Matter of Section 441 read with Section 134(1) of the Companies Act, 2013, signed the Financial Statements and Board's Reports during the period of disqualification	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application <i>Remark: this form is under process.</i>
10.	Form GNL-1	Compounding application filed in the matter of Section 441 of the Companies Act, 2013 read with Section 185 of the Companies Act, 2013	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application <i>Remarks: This form was returned from ROC for re-submission, but the company did not file for re-submission within the prescribed timeline, therefore the form is cancelled.</i>
11.	Form GNL-1	Adjudication application filed in the matter of section 454 of the Companies Act, 2013 read with section 149(1)(b) and 172 of the Companies Act, 2013. The Applicants submits that, based on the turnover reflected	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application <i>Remark: this form is approved.</i>



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
		in the latest audited financial statements, the provisions of Section 149(1) of the Companies Act, 2013 read with Rule 3 of the Companies (Appointment and Qualification of Directors) Rules, 2014 became applicable to the Company. Accordingly, considering 01 July 2024 as the effective date from which compliance was required, the Company was obligated to appoint at least one Woman Director on its Board.					
12.	Form GNL-1	Adjudication application filed in the matter of Section 454 of the Companies Act, 2013 read with Section 149(4) and 172 of the Companies Act, 2013. The Applicant submits that, based on the turnover reflected in the latest audited financial statements for the financial year ended March 31, 2022, the provisions of Section 149(4) of the Companies Act, 2013 read with Rule 4 of the Companies (Appointment and Qualification of	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application <i>Remark: this form is approved.</i>



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
		Directors) Rules, 2014 became applicable to the Company. Accordingly, considering 01 July 2022 as the effective date from which compliance was required, the Company was obligated to appoint at least two Independent Director on its Board. The period of default under consideration is 1346 days .During the period commencing from 01 July 2022 up to 05 May 2025					
13.	Form GNL-1	Adjudication Application filed in the matter of Section 454 of the Companies Act, 2013 read with Section 177 and 178 of the Companies Act, 2013. The Applicants submits that, based on the turnover reflected in the latest audited financial statements for the financial year ended March 31, 2022, the provisions of Sections 177 and 178 of the Companies Act, 2013 became applicable to the Company. Accordingly, considering 01 April 2022 as the effective date from which compliance was	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application Remark: this form is approved.



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
		required, the Company was obligated to constitute the Audit Committee and the Nomination and Remuneration Committee in terms of the aforesaid provisions. the period of default, calculated from 01 April 2022 to 01 May 2026, works out to 1,492 days. The Applicant respectfully submits that the default has since been duly rectified and that the Company is presently in full compliance with the provisions of Sections 177 and 178 of the Act.					
14.	Form GNL-1	Adjudication Application filed in the matter of Section 454 of the Companies Act, 2013 read with rule 9A the Companies (Prospectus And Allotment Of Securities) Rules, 2014 and Section 29(1A) of The Companies Act, 2013. The Applicant Company respectfully submits this application before the Registrar of Companies, Mumbai I under Section 454 of the Companies Act, 2013	-	-	28.06.2026	-	Attachment: 1. Application 2. Board Resolution 3. Other documents as mentioned in the application Remark: this form is approved.



Sr. No	Form No.	Particulars of the Form	Date of Event	Due date of filing	Date of filing	Delay (in days)	Attachments and Remarks
		seeking adjudication in respect of the default relating to non-compliance with the provisions of rule 9A the companies (Prospectus And Allotment Of Securities) rules, 2014, pertaining to not obtaining ISIN the non- dematerialisation of all its existing shares. the equity share of the company was transferred in physical form on 25th March, 2025 and 31st March, 2025 . The Applicants company has obtain ISIN on 14th January, 2025 and failed inform to all existing shareholder due to this shareholder has physically transferred.					
15.	Form INC-34	E-AOA filed for addition of new article in the AOA of the Company	EGM: 17.08.2026	16.09.2026	24.08.2026	-	Attachment: Altered AOA



ANNEXURE-X

COMPLAINCES RELATED TO MSME DISCLOSURES:

Sr. No.	Form	Financial Year	Relevant Act / Rules	Filing Due Date	Date of Filing	Delays (in days)	Status of Compliance
1	<i>MSME Form I (Initial Return)</i>	NA	Section 405 of the Companies Act, 2013 read with the Companies (Furnishing of Information about Payment to Micro and Small Enterprise Suppliers) Order, 2019 under MSME Development Act, 2006	NA			

Note:

MSME Form I is not required if both of the following conditions are met:

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Nirmal Tiwari & Associates
Company Secretaries

1. *The company does not have any outstanding payments due to micro or small enterprise suppliers exceeding 45 days from the date of acceptance or deemed acceptance of goods or services; and*
2. *There are no unpaid amounts to such suppliers as on the reporting date (31st March or 30th September).*



ANNEXURE-XI

COMPLAINCES RELATED TO CHARGES REGISTERED WITH THE REGISTRAR OF COMPANIES:

Sr. No.	SRN	Charge Id	Charge Holder Name	Date of Creation	Date of Modification	Date of Satisfaction	Amount
1	Satisfaction: T97231815	100237574	The South Indian Bank Limited	17.12.2018	-	30.03.2022	Creation amount: 1,00,00,000
2	Creation: T38033494	100485027	HDFC Bank Limited	01.07.2021	-	13.08.2026	Creation amount: 15,06,761
3	Satisfaction: AA1348645	100515476	Aryadhan Financial Solutions Private Limited	27.12.2021	-	13.02.2023	Creation amount: 4,00,00,000
4	Creation: AA3221679 Modification: AC5765515	100735743	Canara Bank	31.05.2023	01.06.2026	-	Creation amount: 5,25,00,000 Modification amount: 6,27,00,000
5	1 st Modification: AA6573387 2 nd Modification: AA7201290 3 rd Modification: AB8883409	100838420	Yes Bank Limited	08.12.2023	1 st Modification: 08.12.2023 2 nd Modification: 20.03.2024 3 rd Modification: 27.10.2025	-	Creation amount: 6,50,00,000 1 st Modification amount: 10,09,50,000 2 nd Modification: 21,09,50,000 3 rd Modification: 15,50,00,000
6.	Creation: AC3668124	101298136	Shivalik Small Finance Bank Limited	30.03.2026	-	-	Creation amount: 5,00,00,000

Note:

Sr. No.	Compliance Requirement	Relevant Section(s)/Rule(s)	Applicable Forms	Time Limit
1	Registration of Charges	Section 77 read with Rule 3 of the Companies (Registration of Charges) Rules, 2014	Form CHG-1	Within 30 days of creation of charge (can be extended up to 120 days with additional fees)
2	Satisfaction of Charge	Section 82 read with Rule 8	Form CHG-4	Within 30 days from the date of satisfaction



Sr. No.	Compliance Requirement	Relevant Section(s)/Rule(s)	Applicable Forms	Time Limit
3	Modification of Charge	Section 77	Form CHG-1 / CHG-9 (as applicable)	Within 30 days of modification (extension similar)
4	Condonation of Delay	Section 87	Application to ROC/Central Government	Application for condonation of delay may be filed with Regional Director

HISTORY OF CHARGES:

Details for Charge Id: 100237574

Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	17.12.2018	16.01.2019	15.02.2019	30 days	Charge of Rs. 1,00,00,000 created in favour of The South Indian Bank Limited on 17.12.2018 Attachments: Agreement for hypothecation dated 17.12.2018 Remarks: <i>1. 30 days of delay in filing the form</i> <i>2. Rate of interest, repayment term (in months), terms of repayment, nature of facility, margin mentioned in the form are not reflecting the agreement for hypothecation attached in the form.</i>
3	Form CHG-4	Satisfaction	30.03.2022	29.04.2022	28.04.2022	-	Satisfaction of Charge of Rs. 1,00,00,000 created in favour of The South Indian Bank Limited on 17.12.2018. Attachments: No dues certificate from The South Indian Bank Limited.

Material Details:

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	17.12.2018
2	Type of charge [As per form]	1. Floating Charge 2. Book debts 3. Moveable Property
3	Amount secured by the charge	Rs. 1,00,00,000
4	Person entitled to charge	The South Indian Bank Limited
5	Rate of interest	@ MCLR (9.45%) + Spread (1.55%) = 11% p.a. (at present) with monthly rests.
6	Terms of repayment	Repayable on demand.
7	Nature of facility	Cash Credit Open Loan (CCOL) : Rs.100.00 Lakhs Sublimit to book debts : (Rs.40.00 Lakhs) Total : Rs.100.00 Lakhs.
8	Extent and operation of the charge	The charge is to operate as security, by way of first charge, for the due repayment of credit facilities aggregating to Rs.100.00 Lakhs together with interests, additional interests, costs, charges, expenses and all other moneys payable by the Company to the Bank in terms of sanction. Hypothecation of entire current assets of the Company both present and future.
9	Details of modifications	-
10	Date of satisfaction	30.03.2022

Details for Charge Id: 100485027

Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	01.07.2021	31.07.2021	06.10.2021	67 days	Charge of Rs. 15,06,761 created in favour of HDFC Bank Limited on 01.07.2021. Attachments: 1. Loan cum hypothecation agreement dated 01.07.2021 2. Board Resolution dated 14.06.2021

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Nirmal Tiwari & Associates
Company Secretaries

Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
							Remarks: 67 days of delay in filing the form
2	Form CHG-4	Satisfaction	13.08.2026	12.09.2026	27.08.2026	-	Satisfaction of Charge of Rs. 15,06,761 created in favour of HDFC Bank Limited on 01.07.2021. Attachments: No dues certificate from HDFC Bank Limited.

Material Details:

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	01.07.2021
2	Type of charge [As per form]	Motor Vehicle (Hypothecation)
3	Amount secured by the charge	Rs. 15,06,761
4	Person entitled to charge	HDFC Bank Limited
5	Rate of interest	7.35% p.a.
6	Terms of repayment	The loan is repayable in 60 EMIs of Rs.30,086/- starting from 05/08/2021 ending on 05/07/2026.
7	Nature of facility	Auto Loan
8	Extent and operation of the charge	The Company hypothecates to and charges in favour of the Bank by way of first and exclusive charge of the Vehicle described in Item No. 13 as security for the repayment / payment by the company of the loan granted or to be granted to the Company by the Bank together with all fees, interest, costs and expenses incurred / to be incurred by the Bank and all other monies payable or to become payable by the Company to the Bank. Exclusive charge on ONE VEHICLE by way of hypothecation namely - MG ZS EV EXCLUSIVE AUTOMATIC
9	Details of modifications	-
10	Date of satisfaction	13.08.2026

Details for Charge Id: 100515476

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064
Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	27.12.2021	26.01.2022	30.12.2021	-	Charge of Rs. 4,00,00,000 created in favour of Aryadhan Financial Solutions Private Limited on 27.12.2021. Attachments: 1. Facility Agreement dated 27.12.2021 2. Pledge Agreement dated 27.12.2021 Remarks:
2	Form CHG-4	Satisfaction	13.02.2023	15.03.2023	08.03.2023	-	Satisfaction of Charge of Rs. 4,00,00,000 created in favour of Aryadhan Financial Solutions Private Limited on 27.12.2021. Attachments: No dues certificate from Aryadhan Financial Solutions Private Limited.

Material Details:

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	27.12.2021
2	Type of charge [As per form]	Other- Agricultural Commodities
3	Amount secured by the charge	Rs. 4,00,00,000
4	Person entitled to charge	Aryadhan Financial Solutions Private Limited
5	Rate of interest	11.75%
6	Terms of repayment	As per Agreement
7	Nature of facility	-
8	Extent and operation of the charge	Maize, Soyabean, Other Pulses, Chana, Moong, Tur (Red Gram) in Shakti Warehouse, Dahisar, Mumbai
9	Details of modifications	-
10	Date of satisfaction	13.02.2023

Details for Charge Id: 100735743



Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	31.05.2023	30.06.2023	30.06.2023	-	Charge of Rs. 5,25,00,000 created in favour of Canara Bank on 31.05.2023. Attachments: 1. Common Hypothecation Agreement dated 31.05.2023 2. Sanction Letter dated 12.05.2023. 3. Guarantee Agreement dated 31.05.2023
2	Form CHG-1	Modification	01.06.2026	01.07.2026	03.09.2026	64 days	Modification of charge by way of enhancement and sanction of a Working Capital Term Loan facility amounting to 1,02,00,000/- (Rupees One Crore Two Lakhs Only) under the Emergency Credit Line Guarantee Scheme (ECLGS 5.0). Attachments: 1. Sanction memorandum for ECLGS 5.0 dated 25.05.2026 2. Board Resolution dated 01.06.2026 3. Supplemental Agreement for enhanced/additional limit dated 01.06.2026 alongwith Schedules 4. Board resolution dated 25.05.2026 of Anand Agro Food Private Limited for giving corporate guarantee for the loan taken by Groma Global Limited 5. Apendix 32 alongwith schedules. Remarks:



Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
							1. <i>Sanction letter with ref number C002140000667 dated 25th May, 2026 is not attached in the form and in the form it is mentioned that terms of repayment, margin and extent and operation of charge is mentioned as per Sanction letter.</i> 2. <i>64 days of delay in filing the form.</i>

Material Details:

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	31.05.2023
2	Type of charge [As per form]	1. Moveable Property- Inventory (Incl. Receivables) 2. Other- Corporate Guarantee of M/s Anand Agro Food Private Limited
3	Amount secured by the charge	Rs. 5,25,00,000
4	Person entitled to charge	Canara Bank
5	Rate of interest	10.25%
6	Terms of repayment	As per sanction letter
7	Nature of facility	Cash Credit (ODBD)
8	Extent and operation of the charge	Hypothecation of all current and future current assets of the company including corporate guarantee of Anand Agro Food Private Limited
9	Details of modifications	Modification of charge by way of enhancement and sanction of a Working Capital Term Loan facility amounting to 1,02,00,000/- (Rupees One Crore Two Lakhs Only) under the Emergency Credit Line Guarantee Scheme (ECLGS 5.0).
10	Date of satisfaction	-

Details for Charge Id: 100838420



Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	08.12.2023	07.01.2024	26.12.2023	-	Charge of Rs. 6,50,00,000 created in favour of Yes Bank Limited on 08.12.2023. Attachments: - Deed of Hypothecation dated 08.12.2023 - Board resolution dated 17.11.2023 Remarks: CIN and contact number missing on the letter head of the company on which board resolution has been taken.
2	Form CHG-1	Modification	08.12.2023	07.01.2024	15.01.2024	8 days	Modification of charge by way of existing facilities stand Enhanced/ revised to INR 10,09,50,000/-. Attachments: - Memorandum of entry for creation of mortgage by way of deposit of title deeds dated 08.12.2023 - Board Resolution dated 17.11.2023 - EGM resolution attached 16.11.2023 Remarks: - CIN and contact number missing on the letter head of the company on which board resolution and EGM resolution has been taken. - No modification agenda is mentioned in the board resolution attached in the form. 8 days of delay in filing the form.
3	Form CHG-1	Modification	20.03.2024	19.04.2024	29.03.2024	-	Modification of charge by way of Existing facilities stand enhanced/revised to INR 21,09,50,000/-.



Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
							Attachments: 1. Memorandum of entry for creation of mortgage by way of deposit of title deeds dated 20.03.2024 2. Board Resolution dated 11.03.2024 Remarks: CIN and contact number missing on the letter head of the company on which board resolution has been taken
4	Form CHG-1	Modification	27.10.2025	26.11.2025	21.11.2025	-	Modification of charge by way of Existing facilities stand revised to INR 15,50,00,000/-. Attachments: Amended and Restated unattested deed of hypothecation

Material Details:

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	08.12.2023
2	Type of charge [As per form]	1. Moveable Property-Inventory 2. Moveable Property-others 3. Book debts 4. Moveable Property-Equipment and machinery 5. Moveable Property- Inventory(incl. receivables) 6. Others- current assets and other movable fixed assets
3	Amount secured by the charge	Rs. 6,50,00,000
4	Person entitled to charge	Yes Bank Limited
5	Rate of interest	12%
6	Terms of repayment	As per Facility Letter
7	Nature of facility	As per Facility Letter
8	Extent and operation of the charge	Pari passu charge on current assets with canara bank in favor of yes bank limited



Sr. No.	Details	Relevant Section(s)/Rule(s)
9	Details of modifications	1st Modification: existing facilities stand Enhanced/ revised to inr 100950000/-. 2nd Modification: Existing facilities stand enhanced/revised to INR 21,09,50,000/-. 3rd Modification: Existing facilities stand revised to INR 15,50,00,000/-
10	Date of satisfaction	-

Details for Charge Id: 101298136

Sr. No.	Form No.	Nature of Charge	Date of Event	Due date of Filing	Date of Filing	Delays(in days)	Particulars of the form including Attachments and Remarks
1	Form CHG-1	Creation	30.03.2026	29.04.2026	27.05.2026	28 days	Charge of Rs. 5,00,00,000 created in favour of Shivalik Small Finance Bank Limited on 30.03.2026. Attachments: 1. Pledge Agreement dated 30.03.2026 2. Loan Agreement dated 30.03.2026 Remarks: 28 days of delay in filing the form.

Material Details:

Sr. No.	Details	Relevant Section(s)/Rule(s)
1	Date of the instrument creating or modifying the charge	30.03.2026
2	Type of charge [As per form]	Immovable property or any interest therein-commercial
3	Amount secured by the charge	Rs. 5,00,00,000
4	Person entitled to charge	Shivalik Small Finance Bank Limited
5	Rate of interest	9.5%
6	Terms of repayment	12 months
7	Nature of facility	-
8	Extent and operation of the charge	Exclusive charge on immovable property in favor of yes bank limited
9	Details of modifications	-
10	Date of satisfaction	-



ANNEXURE-XII

COMPLIANCES RELATED TO CHANGES IN THE REGISTERED OFFICE OF THE COMPANY:

S r. N o.	For m No.	Date of Change	Type of Change	Old Address	New Address	Date of Filing	Due date of Filing	Delay (in days)	Particulars including Attachments and Remarks
1	For m 18	02.03.2010	Within same city/town/village	B-501/2 Groma House sector 19 Vashi Navi Mumbai Maharashtra India 400703	204, 2nd Floor, Cosmos Court Premises, 115D, S V Road, Opp. IOL Petrol Pump, Vile Parle (W), Mumbai-400056, India	16.03.2010	01.04.2010	-	Change in the Registered office address. Remarks: no attachments attached in the form.
2	For m 18	01.03.2013	Within same city/town/village	204, 2nd Floor, Cosmos Court Premises, 115D, S V Road, Opp. IOL Petrol Pump, Vile Parle (W), Mumbai-400056, India	104, Agarwal Chamber, Plot No. 19, Sector 19 C, Palm Beach Road, Vashi, Navi Mumbai, Thane, 400703, Maharashtra India	25.03.2013	31.03.2013	-	Change in the Registered office address. Attachments: NOC from owner and utility bill Remarks: 1. Rent Agreement not attached in the form. 2. This form is reflecting twice in ROC search with additional date of filing as 29.03.2013 with the same details
3	For IN C-22	14.06.2019	Within same city/town/village	104, Agarwal Chamber, Plot No. 19, Sector 19 C, Palm Beach Road, Vashi, Navi Mumbai, Thane,	Plot No.19/20, Mafco Yard, Sector-18, Vashi, Navi Mumbai, Thane-	21.06.2019	29.06.2019	-	Change in the Registered office address. Attachments: 1. Rent Agreement 2. NOC from owner 3. Utility Bill



S r. N o.	Form No.	Date of Change	Type of Change	Old Address	New Address	Date of Filing	Due date of Filing	Delay (in days)	Particulars including Attachments and Remarks
				400703, Maharashtra India	400705, Maharashtra, India				
4	Form IN C-22	25.10.2025	Change outside the local limit of city, town or village	Plot No.19/20, Mafco Yard, Sector-18, Vashi, Navi Mumbai, Thane-400705, Maharashtra, India	1102A 11th Floor Fortune Terraces, Opp Citi Mall, New Link Road, Near Lower Oshiwara Metro Station, Andheri West, Mumbai, Maharashtra, India, 400053	31.10.2025	09.11.2025	-	Change in Registered Office address. Attachments: 1. Special Resolution 2. Leave and License Agreement 3. Photographs of registered office 4. Electricity bill Remarks: 1. <i>The photographs attached in the form are not geo tagged.</i> 2. <i>NOC from the licensor is not attached in the form.</i>
5	IN C-22	NA	From one city to another within same ROC jurisdiction	NA					
6	IN C-23	NA	From one ROC jurisdiction to another (State change)	NA					



ANNEXURE-XIII

COMPLIANCES RELATED TO SIGNIFICANT BENEFICIAL OWNERSHIP (SBO):

WHETHER APPLICABLE TO THE COMPANY: ~~YES~~/ NO

Sr. No.	Particulars	Relevant Section/Rule	Form No.	Filed By	Date of Filing	Delay (in days)	Attachments and Remarks
1	Declaration by SBO	Section 90(1), Rule 3 of the Companies (SBO) Rules, 2018	BEN-1	SBO (Individual)	NA		
2	Return of SBO received by Company to ROC	Section 90(4), Rule 4	BEN-2	Company	NA		



ANNEXURE-XIV

ADDITIONAL REMARKS IN RELATION TO THE COMPANY'S SECRETARIAL PRACTICES AND STATUTORY COMPLIANCES:

The following are the non-compliances reported while doing the due diligence of the secretarial records of the company and the steps taken by them to rectify the non-compliances:

1. **Our Company was incorporated as a public limited company since incorporation, therefore minimum number of shareholders throughout the life of the company should have been minimum 7 as per the Section 12 (1) of the Companies Act 1956-** Our Company defaulted in complying with this provision as the number of members stood reduced to 5 in the FY 2008-09, 2009-10 and 2010-2011, number stood reduced to 3 in FY 2011-12 and 2013-14 and number stood reduced to 2 in FY 2012-13 making the company to non-comply the provisions of Section 12 (1) of the companies Act 1956 which says, if the company incorporates as a public limited company, it require to incorporate the company with min 7 subscribers to MOA which is implied that the public company requires minimum 7 members throughout its existence-*The company has the correct list of shareholders, minutes and statutory registers with them in record and kept by the company at their registered office and corporate office, only the forms have been filed with incorrect list of shareholders. Since the above e-form is not available on the MCA portal and the time period for keeping Annual returns and Balance sheet of the company as corporate records has been ended, since clerical mistake happened by the company, therefore no adjudication/compounding application can be made.*
2. **Our Company's paid-up share capital was less than Rs. 5.00 cr. in the FY 2011-12 therefore as per the provision of Section 383A of the Companies Act 1956, company was required to file Form 66 compliance certificate certified by the PCS-** The act says that if the paid-up share capital of the company is more than Rs. 10 lakh and less than Rs. 5 crore, then the company is required to file Form 66 a compliance certificate certified by PCS and if the limit crosses then appointment of whole time company secretary is required to comply as per the Act- *The company has the PCS report for the FY 2011-12, only the company has inadvertently missed the filing of Form 66, the filing for the same has gone out of limitation period now, so no requirement of compounding or adjudication application is required.*
3. **Our Company has not complied with Section 149(4), Rule 4 of Companies (Appointment and Qualifications of Directors) Rules, 2014 of the Companies Act 2013-** the company as per the provision was required to appoint at least 2 directors as independent director on board as their turnover exceeded Rs. 100 crore in the FY 2021-22 (they booked Rs. 1,21,61,63,307 as turnover), which the company did not comply the same till FY 2024-25, *the same were appointed on January 24, 2026 and March 07, 2026 respectively, thereby regularizing the non-compliance. However, as a corrective measure, the Company has voluntarily filed an adjudication application under Section 454 read with Section 149(4) and Section 172 of the Companies Act 2013 by filing e-Form GNL-1 vide SRN AC4248770 dated June 28, 2026, which is approved as on the date of this report.*
4. **Our Company has not complied with the Section 177 and 178, Rule 4 of Companies (Appointment and Qualifications of Directors) Rules, 2014 of the Companies Act 2013-** as per the Act the company was supposed to constitute audit committee and NRC committee as their turnover exceeded Rs. 100 crore in the FY 2021-22 (they booked Rs. 1,21,61,63,307 as turnover), which the company did not comply the same till FY 2024-25, *the same were constituted on May 01, 2026 respectively, thereby regularizing the non-compliance. However, as a corrective measure, the Company has voluntarily filed an adjudication application under Section 454 read with Section 177 and Section 178 of the Companies Act 2013 by filing e-Form GNL-1 vide SRN AC4248772 dated June 28, 2026, which is approved as on the date of this report.*
5. **Company did not comply with the Section 149 (1)(b) of the Companies Act 2013-** as per the Act the company was required to appoint atleast one women director on board in the FY 2023-24 as their turnover exceeded over Rs. 300 crore (Rs. 3,85,87,96,796 turnover was booked), which the company did not comply the same till FY 2024-25- *the same was*

807, IJMIMA Complex, Behind Infinity Mall, Off Link Road, Malad (West), Mumbai - 400064

Ph.: +91-7666986831 • E: csnirmaltiwari@gmail.com



appointed on March 07, 2026, thereby regularizing the non-compliance. However, as a corrective measure, the Company has voluntarily filed an adjudication application under Section 454 read with Section 149(1)(b) and Section 172 of the Companies Act 2013 by filing e-Form GNL-1 vide SRN AC4248768 dated June 28, 2026, which is approved as on the date of this Report.

6. Company has not filed one e- form CHG-1 as per the provisions of Section 77 of the Companies Act 2013 for creation of charge in favour of Kotak Mahindra Prime for secured loan taken for car within the prescribed time limit - *However, as a corrective measure, the company has repaid the said secured loan as on the date of this report.*
7. Further, there have been some instances of non-compliance noticed with certain statutory authorities with certain provisions of statutory regulations applicable to us, which inter alia includes, our company as per the provisions of Rule 9A of the Companies (Prospectus and Allotment of Securities) Rules, 2014 was required to issue the securities only in dematerialisation form and also every holder of equity shares of unlisted public company who intends to transfer securities on or after October 02, 2018, shall get such securities dematerialised before the transfer. Our Company has made physical transfers and has taken ISIN in the year 2025 and failed to inform all the existing shareholders about the same, thereby non-compliance of the provisions of Rule 9A of the Companies Act 2013 has been taken place. *However, as a corrective measure, the Company has voluntarily filed an adjudication application under Section 450 read with Rule 9A of the Companies (Prospectus and Allotment of Securities) Rules, 2014, of the Companies Act 2013, by filing e-Form GNL-1 vide SRN AC4248774 dated June 28, 2026, which is approved as on the date of this report.*
8. Further, As per the provisions of the Section 134 (1) of the Companies Act 2013, the financial statements of a company needs to be approved by the Board of Directors and signed on behalf of the Board by the persons specified therein before submission to the Statutory Auditor and pursuant to Section 164(2)(a) of the Companies Act, 2013, a director of a company that has failed to file financial statements or annual returns for a continuous period of three financial years is disqualified from being re-appointed as a director of that company or appointed in any other company for a period of five years. Our promoter and whole time director, Mr. Dhruv D Kabra was disqualified during the period from January 11, 2016 till October 31, 2021 for not having filed the financial statements of M/s. Ecoenergie Engineering & Consultancy Private Limited and our Promoter and Managing Director, Mr. Shishir D Kabra remained disqualified during the period from November 01, 2016 till December 01, 2019 for not having filed financial statements of M/s. SLTC Commtrade Private Limited. However, the disqualification of Mr. Shishir D Kabra was revoked in the year 2019. Notwithstanding such disqualification, the aforementioned individuals continued to act as directors of our Company and signed the financial statements for the Financials Years ended March 31, 2014 till Financial year ended March 31, 2018, during the disqualification period and participated in Board meetings held during this period thereby making non-compliance of the above mentioned provisions of the Companies Act 2013. *However, as a corrective measure, the Company has voluntarily filed a compounding application under Section 441 read with Section 134(1) of the Companies Act 2013 by filing e-Form GNL-1 vide SRN AC4248763 dated June 28, 2026, which is under process as on the date of this report.*
9. Further, our company has given loans to directors and their relatives in the past financial years reported in the Draft Prospectus for which Company has not done the compliance as per Section 185 of the Companies Act, 2013. *However, as a corrective measure, the directors have repaid the said loan to the Company as on the date of this Report.*
10. Further, our Company had taken an unsecured loan from one of our promoter group member and promoter group entity, for which non-compliance related to Section 73 of the Companies Act 2013 and rules made thereunder have been made. *However, as a corrective measure the company has repaid such loan as on the date of this Report.*



11. *Further also to note that the reasons of the delay in filing the statutory forms reported/disclosed throughout the secretarial due diligence report under each Annexures are due to inadvertence caused by the management of the company and the delayed forms have been filed by the company with requisite additional fees.*

NIRMAL
TIWARI

Digitally signed by
NIRMAL TIWARI
Date: 2026.09.09
11:14:38 +05'30'

