FORM NO. MGT-7

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



Annual Return

(other than OPCs and Small Companies)

I. REGISTRATION AND OTHER DETAILS

(i) * Corpora	(i) * Corporate Identification Number (CIN) of the company		L74210	DL1987PLC029979	Pre-fill
Global	_ocation Number (GLN) of tl	ne company			
* Permai	nent Account Number (PAN)	of the company	AAACS8	3692P	
(ii) (a) Nam	e of the company		SBEC SY	STEMS (INDIA) LIMIT	
(b) Regi	stered office address				
	elhi			5	
(c) *e-m	ail ID of the company		sbecsys	tems@rediffmail.com	
(d) *Tele	phone number with STD co	de	011425	04842	
(e) Web	osite				
(iii) Date	of Incorporation		15/12/1	987	
(iv) Type	e of the Company	Category of the Company		Sub-category of the	Company

(IV)	Type of the Company	Category of the Company S			Sub-category of the Company			
	Public Company	Company limited	d by shares		Indian Non-Government company			
(v) Whether company is having share capital			Yes	6 (O No			
(vi) *W	hether shares listed on recognize	d Stock Exchange(s)	Yes	s (O No			

(a) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	BOMBAY STOCK EXCHANGE	1

(b) CIN of the Registrar and Tra	nsfer Agent		U67120DL	1993PTC052486	Pre-fill
Name of the Registrar and Trar	nsfer Agent				
BEETAL FINANCIAL AND COMPU	TER SERVICES PRIVA	ATE LIMITED			
Registered office address of the	e Registrar and Tr	ansfer Agents			
99,MADANGIR, B/4, LOCAL SHOP NEAR DADA HARSUKH DAS MAN					
(vii) *Financial year From date 01/0	4/2020	(DD/MM/YYYY)	To date	31/03/2021	(DD/MM/YYYY)
(viii) *Whether Annual general meeti	ng (AGM) held) () Ye	es 🔿	No	-
(a) If yes, date of AGM					
(b) Due date of AGM	30/09/2021				
(c) Whether any extension for A	GM granted	 O	Yes	No	
II. PRINCIPAL BUSINESS AC	TIVITIES OF 1	THE COMPAN	Y		

*Number of business activities 0

	Main Activity group code	Business Activity Code	% of turnover of the company
1			

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

*No. of Companies for which information is to be given 1

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	SBEC SUGAR LIMITED	L15421UP1991PLC019160	Associate	29.86

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

(i) *SHARE CAPITAL

(a) Equity share capital

Authorised capital	Issued capital	Subscribed capital	Paid up capital
15,000,000	10,000,000	10,000,000	10,000,000
150,000,000	100,000,000	100,000,000	100,000,000
	15,000,000	15,000,000 10,000,000	15,000,000 10,000,000 10,000,000

Number of classes

Class of Shares EQUITY SHARES	Authoriood	lssued capital	Subscribed capital	Paid up capital
Number of equity shares	15,000,000	10,000,000	10,000,000	10,000,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	150,000,000	100,000,000	100,000,000	100,000,000

1

(b) Preference share capital

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

Number of classes

0

	Authorised capital	Capital	Subscribed capital	Paid up capital
Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)				

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

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

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
Equity shares	Physical	DEMAT	Total			
At the beginning of the year	6,687,473	3,312,527	10000000			

	-				1	
Increase during the year	0	636	636	0	0	0
i. Pubic Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0
viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify	0	636	636			
DEMATERIALISATION OF SHARES Decrease during the year	636	0	636	0	0	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify						
DEMATERIALISATION OF SHARES	636	0	636			
At the end of the year	6,686,837	3,313,163	10000000	0	0	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify						
Decrease during the wear						
Decrease during the year	0	0	0	0	0	0
i. Redemption of shares	0	0	0	0	0	0

ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company

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

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

0

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

Nil [Details being provided in a CD/Digital Media]	0	Yes	0	No	۲	Not Applicable
Separate sheet attached for details of transfers	0	Yes	0	No		

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

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

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

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

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

Particulars	Nominal value per unit	Total value
Total		0

Details of debentures

Class of debentures	Outstanding as at the beginning of the year	-	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

(v) Securities (other than shares and debentures)

Type of Securities	Number of	Nominal Value of	Total Nominal	Paid up Value of	Total Paid up Value
Socuritico		each Unit		each Unit	
Securilles	Securities	each Unit	value	each Unit	
Total					
1 otal					

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

(i) Turnover

0 -115,225,275

0

(ii) Net worth of the Company

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equ	ity	Preference		
		Number of shares	Percentage	Number of shares	Percentage	
1.	Individual/Hindu Undivided Family					
	(i) Indian	200	0	0		
	(ii) Non-resident Indian (NRI)	2,079,560	20.8	0		
	(iii) Foreign national (other than NRI)	0	0	0		
2.	Government					
	(i) Central Government	0	0	0		
	(ii) State Government	0	0	0		
	(iii) Government companies	0	0	0		

3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	3,020,000	30.2	0	
10.	Others	0	0	0	
	Total	5,099,760	51	0	0

Total number of shareholders (promoters)

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

S. No.	Category	Equ	ity	Prefer	Preference	
		Number of shares	Percentage	Number of shares	Percentage	
1.	Individual/Hindu Undivided Family					
	(i) Indian	4,598,874	45.99	0		
	(ii) Non-resident Indian (NRI)	909	0.01	0		
	(iii) Foreign national (other than NRI)	0	0	0		
2.	Government					
	(i) Central Government	0	0	0		
	(ii) State Government	0	0	0		
	(iii) Government companies	0	0	0		
3.	Insurance companies	0	0	0		
4.	Banks	0	0	0		
5.	Financial institutions	0	0	0		
6.	Foreign institutional investors	0	0	0		
7.	Mutual funds	0	0	0		

8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	300,457	3	0	
10.	Others	0	0	0	
	Total	4,900,240	49	0	0

Total number of shareholders (other than promoters)

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

19,728		
19,734		-

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

Details	At the beginning of the year	At the end of the year
Promoters	6	6
Members (other than promoters)	19,729	19,728
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category		lirectors at the g of the year	Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	0	0	0	0	0	0
B. Non-Promoter	1	6	1	6	0	0
(i) Non-Independent	1	3	1	3	0	0
(ii) Independent	0	3	0	3	0	0
C. Nominee Directors representing	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0

(v) Others	0	0	0	0	0	0
Total	1	6	1	6	0	0

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

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

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
VIJAY KUMAR MODI	00004606	Director		
SHIV SHANKAR AGAR	00004840	Director		
SHYAM BABU VYAS	02025415	Director		
ROHIT GARG	03296571	Additional director		
JAGDISH CHANDER C	05316202	Director		
RITU SIKKA	06953465	Director		
ASHA AGARWAL	09026835	Additional director		
PRIYANKA NEGI	AWIPN4666K	Company Secretar		
LUV GUPTA	AIPPG3622B	CFO		

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

4

9

Name	DIN/PAN		(change in decignation)	Nature of change (Appointment/ Change in designation/ Cessation)
R K AGARWAL	00298252	Director	05/12/2020	CESSATION (DEATH)
ANUPAM BANSAL	00004318	Director	12/02/2021	CESSATION (RESIGNATION)
ROHIT GARG	03296571	Additional director	12/02/2021	APPOINTMENT
ASHA AGARWAL	09026835	Additional director	12/02/2021	APPOINTMENT

IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

A. MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS

Number of meetings held

1			

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
		5		% of total shareholding
ANNUAL GENERAL MEETI	28/09/2020	19,793	47	32.44

B. BOARD MEETINGS

*Number of meetings held 6

S. No.	Date of meeting	Total Number of directors associated as on the date		
		of meeting	Number of directors attended	% of attendance
1	29/07/2020	7	7	100
2	29/08/2020	7	4	57.14
3	15/09/2020	7	4	57.14
4	11/11/2020	7	3	42.86
5	01/02/2021	6	3	50
6	12/02/2021	6	3	50

C. COMMITTEE MEETINGS

er of meeti	ngs neid		8		
S. No.	Type of meeting		Total Number of Members as	A	ttendance
	5	Date of meeting	on the date of the meeting	Number of members attended	% of attendance
1	AUDIT COMM	29/07/2020	3	3	100
2	AUDIT COMM	15/09/2020	3	3	100
3	AUDIT COMM	11/11/2020	3	3	100
4	AUDIT COMM	12/02/2021	3	2	66.67
5	STAKEHOLDE	29/07/2020	3	3	100
6	STAKEHOLDE	15/09/2020	3	3	100
7	N & R COMMI	29/08/2020	3	3	100
8	N & R COMMI	12/02/2021	3	2	66.67

		Board Meetings			Committee Meetings			Whether attended AGM
S. No.	of the director	Number of Meetings which director was	Meetings	% of		Meetings	eetings	
		entitled to attend	attended		entitled to attend	attended	allondanoo	(Y/N/NA)
1	VIJAY KUMAF	6	6	100	4	4	100	
2	SHIV SHANKA	6	6	100	6	6	100	
3	SHYAM BABL	6	1	16.67	2	0	0	
4	ROHIT GARG	0	0	0	0	0	0	
5	JAGDISH CHA	6	6	100	8	8	100	
6	RITU SIKKA	6	1	16.67	0	0	0	
7	ASHA AGARV	0	0	0	0	0	0	

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

🗌 Nil

Number o	f Managing Director, V	/hole-time Directors	and/or Manager v	whose remuneratio	n details to be ente	ered 0	
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						
Number o	f CEO, CFO and Com	pany secretary who	se remuneration d	etails to be entered	ł	2	
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	LUV GUPTA	CFO	221,736			321,806	543,542
2	PRIYANKA NEGI	COMPANY SEC	258,944			244,057	503,001
	Total		480,680	0	0	565,863	1,046,543
Number o	f other directors whose	e remuneration deta	ils to be entered			0	
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

- * A. Whether the company has made compliances and disclosures in respect of applicable Yes O No provisions of the Companies Act, 2013 during the year
 - B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

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

Name of the		Date of Order			Details of appeal (if any) including present status			
(B) DETAILS OF CO	(B) DETAILS OF COMPOUNDING OF OFFENCES NII							

Name of the	Name of the court/ concerned Authority	Name of the Act and section under which offence committed	Amount of compounding (in Rupees)

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

○ Yes ● No

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

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

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

Name	SONIYA GUPTA
Whether associate or fellow	○ Associate ● Fellow
Certificate of practice number	8136

I/We certify that:

(a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
(b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.

Declaration

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

21

dated 12/08/2015

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

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

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

To be digitally signed by

Director						
DIN of the director	00004840					
To be digitally signed by	/					
Company Secretary						
⊖ Company secretary in	practice					
Membership number	36819	Certificate of practice r	number	[
Attachments					List of attachments	
1. List of share I	olders, debenture holders		Attach	MGT-8.pdf		
2. Approval lette	r for extension of AGM;		Attach			
3. Copy of MGT	-8;		Attach			
4. Optional Attac	chement(s), if any		Attach			
				[Remove attachment	
Mo	Chec	k Form	Prescrutiny		Submit	

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



Form No. MGT-8

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

CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

I have examined the registers, records and books and papers of **SBEC SYSTEMS (INDIA) LIMITED** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on 31.03.2021. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the company, its officers and agents, I certify that:

A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.

B. During the aforesaid financial year, the Company has complied with provisions of the Act & Rules made there under in respect of:

- 1. Its status under the Act; Complied
- 2. Maintenance of registers/records & making entries therein; Complied
- 3. Filing of forms and returns as stated in the annual return, with the Registrar of Companies, within/beyond the prescribed time:

S. No.	Form Name	Filing Date	SRN	Additional Fees
1.	Form AOC-4 XBRL	19.11.2020	R71533673	Without Additional Fees
2.	Form MGT-7	28.12.2020	R78435500	Without Additional Fees
3.	Form DPT-3	11.09.2020	R54957964	Without Additional Fees
4.	Form MSME	12.06.2020	R41586439	Without Additional Fees
5.	Form MGT-14	13.08.2020	R49692502	Without Additional Fees
6.	Form Dir-12	22.02.2021	T03422573	Without Additional Fees
7.	Form MGT-15	09.10.2020	R66279563	Without Additional Fees
8.	Form Dir-12	22.01.2021	R87231544	With Additional Fees
9.	Form MGT-14	11.09.2020	R54957113	Without Additional Fees
10.	Form MGT-14	09.10.2020	R66351305	Without Additional Fees

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

S. No.	Date of Board Meetings
1.	29/07/2020
2.	29/08/2020
3.	15/09/2020
4.	11/11/2020
5.	01/02/2021
6.	12/02/2021

The Company has re-constituted the following Committees applicable on the Company:

- a) Audit Committee
- b) Nomination and Remuneration Committee
- c) Stakeholders Relationship Committee
- 5. Closure of Register of Members and Security holders, as the case may be- The Book were closed from 22nd September, 2020 to 28th September, 2020 during the financial year.
- 6. Advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act; Not Applicable.
- 7. Contracts/arrangements with related parties as specified in section 188 of the Act ;- The transactions entered with related parties during the year under review were on Arm's Length basis and in the ordinary course of business. The provisions of Section 188 of the Companies Act, 2013 are therefore, not attracted.

As required under Regulation 23 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the Company has formulated a policy on related party transactions and the same was approved by the Audit Committee and the Board of Directors. The said policy has been uploaded at the investors section of the Company's website at <u>www.sbecsystems.com</u>

- 8. Transfer and/or transmission of equity shares and issue of security certificates in such instances; All Transfer and/or transmissions were done through RTA M/s Beetal Financial & Computer Services (P) Ltd.
- 9. Keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act- Not Applicable.
- 10. Declaration/payment of dividend; transfer of unpaid/unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act -**Not Applicable**.
- 11. Signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub-sections (3), (4), (5) and (6) thereof; **Complied**

The Financial Statement for the Financial year ended 31.03.2020 has been in due compliance of Section 134 of the Act and report of directors is as per sub-sections (3), (4), (5) and (6) of the Companies Act, 2013.

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

DIN/PAN	Name	Designation	Date of Appointment	Date of Cessation
00004606	Vijay Kumar Modi	Director	29/09/2004	-
00004840	Shiv Shankar Agarwal	Director	22/01/2008	-
ABIPA2954Q	Shiv Shankar Agarwal	CEO(KMP)	21/05/2015	
02025415	Shyam Babu Vyas	Director	21/05/2015	
05316202	Jagdish Chander Chawla	Director	21/05/2015	
06953465	Ritu Sikka	Director	24/09/2014	
AWIPN4666K	Priyanka Negi	Company Secretary	01/08/2018	
AIPPG3622B	Luv Gupta	CFO(KMP)	01/06/2018	
03296571	Rohit Garg	Director	12/02/2021	
09026835	Asha Agarwal	Director	12/02/2021	
00004318	Anupam Bansal	Director	14/12/2005	12/02/2021
00298252	Rajeev Kumar Agarwal	Director	21/05/2015	05/12/2020

The composition of Board of Directors of the company during the financial year 2020-2021 was as under:

The Company has not obtained the Registration of Mr. Shyam Babu Vyas,_independent directors with database of independent director maintained with MCA during the year ended 31.03.2021.

- 13. Appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act; Not Applicable.
- 14. Approvals required be taken from the Central Government, Tribunal, to Director, Registrar, Regional Court or such other authorities under the various provisions of the Act; - Complied.
- 15. Acceptance/ renewal/ repayment of deposits; Not Applicable.
- 16. Loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act: -

During the financial year 2020-21, the Company has not granted any investment nor given any loans or guarantees covered under the provisions of section 186 of the Companies Act, 2013.

- 17. Borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable; -Complied
- 18. Alteration of the provisions of the Memorandum and/ or Articles of Association of the Company; Not Applicable.

For Soniya Gupta & Associates Company Secretaries Company Secretaries Source Company Source Company Source Company FCS: 7493 CP: 8136

Place: New Delhi Date: 20.08.2021 UDIN: F007493C000811549