

Annual Return**Form No. MGT – 7**

As on financial year ended on March 31, 2021

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

I. Registration and Other Details :

i)	Corporate Identification Number (CIN) of the Company	L99999MH1949PLC007039		
	Global Location Number (GLN) of the Company	NIL		
	Permanent Account Number (PAN) of the Company	AAACP2567L		
ii)	(a) Name of the Company	Patel Engineering Limited		
	(b) Registered office address	Patel Estate S V Road, Jogeshwari (West), Mumbai – 400102		
	(c) Email ID of the Company	investors@pateleng.com		
	(d) Telephone number with STD code	022-26767500		
	(e) Website	www.pateleng.com		
iii)	Date of Incorporation	April 2, 1949		
iv)	Type of Company Category : Sub-Category of the Company:	Public Company Company limited by shares Indian Non-Government Company		
v)	Whether the Company is having share capital	Yes		
vi)	Whether shares listed on recognized Stock Exchange	Yes		
	(a) Details of stock exchanges where shares are listed	<u>Sr. No.</u>	<u>Stock Exchange Name</u>	<u>Code</u>
		1.	BSE Limited	A 1
		2.	National Stock Exchange of India Limited	A 1024
	(b) CIN of the Registrar and Transfer Agent Name of the Registrar and Transfer Agent Registered office of the Registrar and Transfer Agent	U67190MH1999PTC118368 Link Intime India Private Limited C 101, 247 Park, L.B.S. Marg, Vikhroli (West), Mumbai - 400083		
vii)	Financial Years from date To date	01-04-2020 31-03-2021		
viii)	Whether Annual General Meeting held			
	(a) If yes date of AGM	To be held on 15 th September, 2021		
	(b) Due date of AGM	30 th September, 2021		
	(c) Whether any extension of AGM granted	No		

II. Principal Business Activities of the Company :

Number of business activity: 2

Sr. No.	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% total turnover of the company
1	F	Construction	F2	Roads, railways, Utility projects	100
2	L	Real Estate	L1	Real estate activities with own or leased property	0

III. Particulars of Holding, Subsidiary and Associate Companies (including joint ventures): 100

Sr. No.	Name and Address of the Company	CIN/FCRN	Holding/ Subsidiary/ Associate/ Joint Venture	% of shares held
1.	Zeus Minerals Trading Pvt. Ltd.	U51909MH2007PTC167522	Subsidiary	100.00
2.	Patel Concrete & Quarries Pvt. Ltd.	U14200MH2008PTC178210	Subsidiary	100.00
3.	Friends Nirman Pvt. Ltd.	U70101MH2004PTC308856	Subsidiary	100.00
4.	Energy Design Pvt. Ltd.	U72900MH2009PTC193475	Subsidiary	100.00
5.	Patel Lands Ltd.	U70100MH2010PLC207028	Subsidiary	100.00
6.	Patel Engineering Infrastructure Ltd.	U45201MH2006PLC162858	Subsidiary	100.00
7.	Patel Engineers Pvt. Ltd.	U70100MH2005PTC157559	Subsidiary	100.00
8.	Patel Patron Pvt. Ltd.	U45200MH2005PTC158493	Subsidiary	100.00
9.	Pandora Infra Pvt. Ltd.	U45201MH2006PTC164318	Subsidiary	100.00
10.	Vismaya Constructions Pvt. Ltd.	U45400MH2007PTC171048	Subsidiary	100.00
11.	Bhooma Realities Pvt. Ltd.	U45400MH2007PTC171064	Subsidiary	100.00
12.	Hampus Infrastructure Pvt Ltd	U74999RJ2018PTC060722	Subsidiary	100.00
13.	Shashvat land Projects Pvt. Ltd.	U70102MH2007PTC171886	Subsidiary	100.00
14.	Patel Energy Resources Ltd.	U40102TG2008PLC073509	Subsidiary	100.00
15.	Shreeanant Construction Pvt. Ltd.	U45200MH2005PTC158079	Subsidiary	100.00
16.	Apollo Buildwell Pvt. Ltd.	U45200MH2007PTC167521	Subsidiary	100.00
17.	Arsen Infra Pvt. Ltd.	U45201MH2006PTC164319	Subsidiary	100.00
18.	Lucina Realtors Pvt. Ltd.	U70109MH2007PTC166898	Subsidiary	100.00
19.	PBSR Developers Pvt. Ltd.	U45209TG2012PTC078886	Subsidiary	100.00
20.	Phedra Projects Pvt. Ltd.	U45201MH2006PTC164317	Subsidiary	100.00

21.	Patel Hydro Power Pvt. Ltd.	U40108MH2010PTC326949	Subsidiary	100.00
22.	Dirang Energy Pvt. Ltd.	U40101MH2008PTC330438	Subsidiary	100.00
23.	West Kameng Energy Pvt. Ltd.	U40101MH2008PTC326589	Subsidiary	100.00
24.	Digin Hydro Power Pvt. Ltd.	U40102MH2008PTC331818	Subsidiary	100.00
25.	Meyong Hydro Power Pvt. Ltd.	U40104MH2008PTC332887	Subsidiary	100.00
26.	Saskang Rong Energy Pvt. Ltd.	U40108MH2008PTC185929	Subsidiary	100.00
27.	Patel Thermal Energy Pvt. Ltd.	U40102TG2011PTC072720	Subsidiary	100.00
28.	PEL Power Ltd.	U40108TG2006PLC067638	Subsidiary	100.00
29.	PEL Port Pvt. Ltd.	U74999TG2008PTC066862	Subsidiary	100.00
30.	Jayshe Gas Power Pvt. Ltd.	U40300TG2010PTC071867	Subsidiary	100.00
31.	Patel Energy Projects Pvt. Ltd.	U40102TG2008PTC101411	Subsidiary	100.00
32.	Patel Energy Assignment Pvt. Ltd.	U40101TG2008PTC100513	Subsidiary	100.00
33.	Patel Energy Operations Pvt. Ltd.	U40102TG2008PTC126026	Subsidiary	100.00
34.	Patel Energy Ltd.	U70100MH1996PLC102612	Subsidiary	99.99
35.	Hera Realcon Pvt. Ltd.	U70109MH2007PTC166825	Subsidiary	97.13
36.	Patel KNR Infrastructures Ltd.	U45201MH2006PLC162856	Subsidiary	60.00
37.	Michigan Engineers Pvt. Ltd.	U45300MH1973PTC016515	Subsidiary	51.00
38.	Patel Engineering Lanka (Pvt.) Ltd.	N.A.	Subsidiary	100.00
39.	Patel Engineering (Mauritius) Ltd.	N.A.	Subsidiary	100.00
40.	Patel Engineering Inc.	N.A.	Subsidiary	100.00
41.	Patel Engineering (Singapore) Pte. Ltd.	N.A.	Subsidiary	100.00
42.	Waterfront Developers Ltd.	N.A.	Subsidiary	100.00
43.	Les Salines Development Ltd.	N.A.	Subsidiary	100.00
44.	La Bourgade Development Ltd.	N.A.	Subsidiary	100.00
45.	Ville Magnifique Development Ltd.	N.A.	Subsidiary	100.00
46.	Sur La Plage Development Ltd.	N.A.	Subsidiary	100.00
47.	PT PEL Mineral Resources	N.A.	Subsidiary	100.00
48.	PT Patel Engineering Indonesia	N.A.	Subsidiary	100.00
49.	Patel Mining (Mauritius) Ltd.	N.A.	Subsidiary	100.00
50.	Enrich Mining Vision Lda	N.A.	Subsidiary	100.00
51.	Patel Mining Privilege Lda.	N.A.	Subsidiary	100.00
52.	Patel Infrastructure, Lda	N.A.	Subsidiary	100.00
53.	Trend Mining Projects, Lda	N.A.	Subsidiary	100.00

54.	Accord Mines Venture, Lda	N.A.	Subsidiary	100.00
55.	Netcore Mining Operations, Lda	N.A.	Subsidiary	100.00
56.	Metalline Mine Works, Lda	N.A.	Subsidiary	100.00
57.	Assignment Mozambique, Lda	N.A.	Subsidiary	100.00
58.	Chivarro Mines Mozambique, Lda	N.A.	Subsidiary	100.00
59.	Fortune Mines Concession, Lda	N.A.	Subsidiary	100.00
60.	Omni Mines Enterprises, Lda	N.A.	Subsidiary	100.00
61.	Quest Mining Activities, Lda	N.A.	Subsidiary	100.00
62.	Naulo Nepal Hydro Electric Pvt. Ltd.	N.A.	Subsidiary	94.00
63.	ASI Global LLC.	N.A.	Subsidiary	100.00
64.	ASI Constructors Inc.	N.A.	Subsidiary	100.00
65.	Patel Surya (Singapore) Pte Ltd.	N.A.	Subsidiary	60.00
66.	PT Surya Geo Minerals	N.A.	Subsidiary	100.00
67.	Pt Patel Surya Minerals	N.A.	Subsidiary	60.00
68.	Pt Patel Surya Jaya	N.A.	Subsidiary	60.00
69.	PT Surpat Geo Minerals	N.A.	Subsidiary	100.00
70.	Bellona Estate Developers Ltd.	U70200MH2007PLC166899	Associate	49.00
71.	Hitodi Infrastructure Pvt. Ltd	U74999RJ2017PLC059545	Associate	49.00
72.	Raichur Sholapur Transmission Co. Pvt. Ltd.	U40108MH2009PTC220024	Associate	33.34
73.	ACP Tollways Pvt. Ltd.	U45400UP2011PTC047755	Associate	32.00
74.	Age Patel JV	N.A.	Joint Venture	49.00
75.	Patel Michigan JV	N.A.	Joint Venture	10.00
76.	Patel SEW JV	N.A.	Joint Venture	60.00
77.	Patel-Avantika-Deepika-BHEL	N.A.	Joint Venture	52.83
78.	Patel-Varks-Precision Consortium	N.A.	Joint Venture	60.00
79.	Patel-Varks JV	N.A.	Joint Venture	65.00
80.	Cico Patel JV	N.A.	Joint Venture	99.90
81.	Patel KNR JV	N.A.	Joint Venture	50.00
82.	KNR Patel JV	N.A.	Joint Venture	49.00
83.	Era Patel Advance JV	N.A.	Joint Venture	30.00
84.	Era Patel Advance Kiran JV	N.A.	Joint Venture	47.06
85.	Patel Apco JV	N.A.	Joint Venture	50.00
86.	Patel Soma JV	N.A.	Joint Venture	50.00

87.	Patel-Onycon JV	N.A.	Joint Vneture	60.00
88.	PEL-PPCPL-HPCL JV	N.A.	Joint Venture	51.00
89.	Patel-UEIPL	N.A.	Joint Venture	60.00
90.	PEL Gond JV	N.A.	Joint Venture	45.00
91.	PEL Parbati JV	N.A.	Joint Venture	52.00
92.	HES Suthaliya JV	N.A.	Joint Venture	45.00
93.	NEC PEL JV	N.A.	Joint Venture	45.00
94.	Patel Siddhi Vinayak JV	N.A.	Joint Venture	51.00
95.	ISC Projects PEL JV	N.A.	Joint Venture	49.00
96.	PEL ISC Prathamesh JV	N.A.	Joint Venture	50.00
97.	M/s Luhri Hydro Power Consortium (A Consortium of Patel Engineering Limited & HES Infra Pvt. Ltd.	N.A.	Joint Venture	60.00
98.	PATEL VI JV	N.A.	Joint Venture	51.00
99.	PEL-RBG JV	N.A.	Joint Venture	51.00
100.	Patel SA JV	N.A.	Joint Venture	75.00

IV. Share Capital, Debenture and other Securities of the Company

i) Share Capital

(a) Equity Share Capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	2,75,00,00,000	46,54,53,024	46,54,53,024	46,54,53,024
Total amount of equity shares (in Rupees)	2,75,00,00,000	46,54,53,024	46,54,53,024	46,54,53,024

Number of classes: 1

Sr. No.	Authorised capital	Issued Capital	Subscribed capital	Paid up capital
Number of equity shares	2,75,00,00,000	46,54,53,024	46,54,53,024	46,54,53,024
Nominal value per share (in rupees)	1	1	1	1
Total amount of equity shares (in rupees)	2,75,00,00,000	46,54,53,024	46,54,53,024	46,54,53,024

(b) Preference Share capital

Class of shares (Preference Shares)	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of preference shares	80,00,00,000	-	-	-
Nominal value per share (in rupees)	1	1	1	1
Total amount of preference shares (in rupees)	80,00,00,000	-	-	-

Number of classes: 1

Class of shares (Preference Shares)	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of preference shares	80,00,00,000	-	-	-
Nominal value per share (in rupees)	1	1	1	1
Total amount of preference shares (in rupees)	8000,00,000	-	-	-

(c) Unclassified share capital

Particulars	Authorised capital
Total amount of unclassified	Nil

(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				
At the beginning of the year	4,081,78,292	4,081,78,292	4,081,78,292	14,11,95,82,544
Increase during the year	5,72,74,732	5,72,74,732	5,72,74,732	81,99,72,036
i. Public Issues	0	0	0	0
ii. Rights Issue	0	0	0	0
iii. Bonus issue	0	0	0	0
iv. Private Placement/ Preferential allotment	5,72,74,732	5,72,74,732	5,72,74,732	8,19,972,036
v. ESOP	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0
vii. Conversion of Preference share				0

viii. Conversion of Debentures	0	0	0	0
ix. GDRs/ ADRs	0	0	0	0
x. Other Specify	0	0	0	0
Decrease during the year	0	0	0	0
i. Buy-back of shares	0	0	0	0
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify	0	0	0	0
At the end of the year	46,54,53,024	46,54,53,024	46,54,53,024	14,93,95,54,580
Preference shares	16,66,94,397	16,66,94,397	16,66,94,397	0
Increase during the year	0	0	0	0
i. Issues of shares	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0
iii. Others, specify	0	0	0	0
Decrease during the year	0	0	0	0
i. Redemption of shares	0	0	0	0
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify (Conversion of OCPS into Equity)	16,66,94,397	16,66,94,397	16,66,94,397	0
At the end of the year	0	0	0	0

(ii) Details of stock split/ consolidated during the year (for each class of shares): NIL

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

The details are available with the Company and can be obtained by the members upon request.

(iv) Indebtedness including debentures (Outstanding as at the end of the financial year)

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	1,138	10,00,000	1,13,80,00,000
Partly convertible debentures	0	0	0
Fully convertible debentures*	45,10,384	1,000	3,85,77,20,937
Secured Loans (including interest outstanding/accrued but not due for payment) excluding deposits	-	-	15,04,40,00,784

Unsecured Loans (including interest outstanding/accrued but not due for payment) excluding deposits	-	-	78,32,92,687
Deposits			
Total	-	-	20,82,30,14,407

* *Optionally Convertible Debentures*

Details of Debentures

Class of debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as the end of the year
Non-convertible debentures	1,13,80,00,000	0	0	1,13,80,00,000
Partly convertible debentures	0	0	0	0
Fully convertible debentures*	4,98,78,62,728	0	1,13,01,41,791	3,85,77,20,937

* *Optionally Convertible Debentures*

v) **Securities (other than shares and debentures): NA**

V. Turnover and Net Worth of the Company

- i. Turnover: Rs. 17,19,12,46,868
- ii. Net-worth of the Company: Rs. 24,35,54,19,027

VI. (a) Shareholding Pattern - Promoters

S. No.	Category	Equity		Preference	
		No. of shares	Percentage	No. of shares	Percentage
1.	Individual / Hindu Undivided Family				
	(i) Indian	3,62,15,833	7.78	0	0
	(ii) Non-resident Indian (NRI)	0	0	0	0
	(iii) Foreign national (other than NRI)	0	0	0	0
2.	Government	0	0	0	0
	(i) Central Government	0	0	0	0
	(ii) State Government	0	0	0	0
	(iii) Government companies	0	0	0	0
3.	Insurance companies	0	0	0	0
4.	Banks	0	0	0	0
5.	Financial institutions	0	0	0	0
6.	Foreign institutional investors	0	0	0	0
7.	Mutual funds	0	0	0	0
8.	Venture capital	0	0	0	0

9.	Body corporate (not mentioned above)	22,55,27,276	48.45	0	0
10.	Others	0	0	0	0
	Total	26,17,43,109	56.23	0	0

Total number of shareholders (promoters): 6

(b) Share holding pattern – Public / Other than promoters

S. No.	Category	Equity		Preference	
		No. of shares	Percentage	No. of shares	Percentage
1.	Individual / Hindu Undivided Family				
	(i) Indian	6,98,93,072	15.02	0	0
	(ii) Non-resident Indian (NRI)	11,83,255	0.25	0	0
	(iii) Foreign national (other than NRI)	0	0	0	0
2.	Government				
	(i) Central Government	100	0.00	0	0
	(ii) State Government	0	0	0	0
	(iii) Government companies	0	0	0	0
3.	Insurance companies	23,32,947	0.50	0	0
4.	Banks	8,88,92,233	9.30	0	0
5.	Financial institutions	2,19,04,762	4.70	0	0
6.	Foreign institutional investors	0	0	0	0
7.	Mutual funds	0	0	0	0
8.	Venture capital	0	0	0	0
9.	Body corporate (not mentioned above)	53,14,693	1.14	0	0
10.	Others Employee Benefit Trust, NBFC, IEPF, Trusts	1,41,88,853	0.22	0	0
	Total	20,37,09,915	43.77	0	0

Total number of shareholders (other than promoters): 60104

Total number of shareholders (Promoters + Public / Other than promoters): 60111

VII. Number of Promoter, 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)	56,388	60104
Debenture holders	30	27

VIII. Details of Directors and Key Managerial Personnel

(A) Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by the directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	1	0	1	0	7.45	0.00
B. Non-Promoter						
(i) Non-independent	3	0	2	0	0.04	0.00
(ii) Independent	0	4	0	3	0.00	0.00
C. Nominee Directors representing	0	0	0	0	0.00	0.00
(i) Banks & FIs	0	0	0	0	0.00	0.00
(ii) Investing institutions	0	0	0	0	0.00	0.00
(iii) Government	0	0	0	0	0.00	0.00
(iv) Small share holders	0	0	0	0	0.00	0.00
(v) Others	0	0	0	0	0.00	0.00
Total	4	4	3	3	7.49	0.00

Number of Directors and Key Managerial Personnel (who is not director) as on financial year end date: 8

(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: if any)
Mr. Rupen Patel	00025983	Managing Director	3,46,85,933	
Ms. Geetha Sitaraman	07138206	Director	0	
Mr. Barendra Bhoi	08197173	Director	0	
Mr. K. Ramasubramanian	01623890	Director	0	
Ms. Kavita Shirvaikar	ABBPR1695J	CFO	1,67,120	
Ms. Kavita Shirvaikar	07737376	Whole-time Director	1,67,120	
Mr. Sunil Sapre	05356483	Whole-time Director	0	
Ms. Shobha Shetty	AAQPS3031B	Company Secretary	1,950	

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

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment / change in designation / cessation	Nature of change (Appointment/ Change in designation/ Cessation)
Mr. C. K. Singh	00196978	Whole time Director	30/06/2020	Resignation
Mr. Khizer Ahmed	00032567	Director	19/09/2020	Cessation

IX. Meeting of Members/ Class of Members/ Board/ Committees of the Board of Directors

A. Members/ Class/ Requisitioned/ NCLT/ Court Convened Meetings

Number of meetings held:

Type of meeting	Date of meeting	Total number of members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	28-09-2020	58353	39	62.79

B. Board Meetings

Number of meetings held: 4

S. No.	Date of meeting	Total number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	26-06-2020	8	8	100.00
2	28-08-2020	7	7	100.00
3	13-11-2020	6	6	100.00
4	12-02-2021	6	6	100.00

C. Committee Meetings

Number of meetings held: 10

S. No.	Type of meeting	Date of meeting	Total number of members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	26-06-2020	4	4	100.00
2	Audit Committee	28-08-2020	4	4	100.00
3	Audit Committee	13-11-2020	3	3	100.00
4	Audit Committee	12-02-2021	3	3	100.00
5	Nomination & Remuneration Committee	27-08-2020	4	4	100.00
6	Nomination & Remuneration Committee	13-11-2020	3	2	66.66
7	Nomination & Remuneration Committee	11-02-2021	3	2	66.66
8	Stakeholders Relationship Committee	11-02-2021	3	2	66.66
9	CSR Committee	27-08-2020	3	3	100.00
10	CSR Committee	11-01-2021	3	3	100.00

D. Attendance of Directors

S. No.	Name of the Director	Board Meetings			Committee Meetings			Whether attended AGM held on September 28, 2020
		No. of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	No. of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	
1.	Mr. Rupen Patel	4	4	100.00	9	7	77.77	Yes
2.	Mr. Khizer Ahmed	2	2	100.00	4	4	100.00	Yes
3.	Mr. K Ramasubramanian	4	4	100.00	10	10	100.00	Yes
4.	Ms. Geetha Sitaraman	4	4	100.00	7	7	100.00	Yes
5.	Mr. C. K. Singh	1	1	100.00	0	0	0.00	No
6.	Ms. Kavita Shirvaikar	4	4	100.00	3	3	100.00	Yes
7.	Mr. Sunil Sapre	4	4	100.00	1	0	0.00	Yes
8.	Mr. Barendra Bhoi	4	4	100.00	0	0	0.00	Yes

X. Remuneration of Directors and Key Managerial Personnel

Number of Managing Director, Whole-time Director and/or Manager whose remuneration details to be entered: 4

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat Equity	Others	Total Amount
1.	Mr. Rupen Patel	Managing Director	3,02,09,698	0	0	17,02,080	3,19,11,778
2.	Ms. Kavita Shirvaikar	Whole-time Director	1,79,07,933	0	0	8,40,000	1,87,47,933
3.	Mr. C K Singh	Whole-time Director	31,12,089	0	0	2,02,500	33,14,589
4.	Mr. Sunil Sapre	Whole-time Director	1,01,99,107	0	0	6,00,000	1,07,99,107

Number of CEO, CFO and Company secretary whose remuneration details to be entered: 2

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat Equity	Others	Total Amount
1.	Ms. Kavita Shirvaikar	CFO	0	0	0	0	0
2.	Ms. Shobha Shetty	Company Secretary	30,55,036	0	0	1,98,000	32,53,036

Number of other directors whose remuneration details to be entered: NIL

XI. Matters Related To Certification of Companies and Disclosures

A. Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year: YES

B. If No, give reasons/ observations- NA

XII. Penalty and Punishment – Details thereof

(A) Details of Penalties / Punishments imposed on Company/ Directors/ Officers: NIL

(B) Details of Compounding of Offences: NIL

XIII. Whether complete list of shareholders, debenture holders has been enclosed as attachment: The details are available with the Company and can be obtained by the members upon request.

XIV. Compliance of Sub-Section (2) of Section 92, in case of listed companies

In case of a listed company or 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

Form MGT-8 will be obtained from PCS for FY 2020-2021