

FORM NO. MGT-7

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



Annual Return (other than OPCs and Small Companies)

Form language English Hindi

Refer the instruction kit for filing the form.

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (CIN) of the company

L15421UP1991PLC019160

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AAECS7222B

(ii) (a) Name of the company

SBEC SUGAR LIMITED

(b) Registered office address

VILL: LOYAN MALAKPUR,TEH: BARAUT
BAGHPAT
UTTAR PRADESH
Uttar Pradesh
250611

(c) *e-mail ID of the company

investors@sbecsugar.com

(d) *Telephone number with STD code

01234259206

(e) Website

www.sbecsugar.com

(iii) Date of Incorporation

03/05/1991

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

(v) Whether company is having share capital

Yes

No

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

Yes

No

(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 Transfer Agent

U67120DL1993PTC052486

Pre-fill

Name of the Registrar and Transfer Agent

BEETAL FINANCIAL AND COMPUTER SERVICES PRIVATE LIMITED

Registered office address of the Registrar and Transfer Agents

99,MADANGIR, B/4, LOCAL SHOPPING CENTRE,
NEAR DADA HARSUKH DAS MANDIR

(vii) *Financial year From date (DD/MM/YYYY) To date (DD/MM/YYYY)

(viii) *Whether Annual general meeting (AGM) held Yes No

(a) If yes, date of AGM

(b) Due date of AGM

(c) Whether any extension for AGM granted

Yes No

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*Number of business activities

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	C	Manufacturing	C1	Food, beverages and tobacco products	100

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

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

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	SBEC BIOENERGY LIMITED	U40105UP1996PLC037250	Subsidiary	55
2	SBEC STOCKHOLDING AND IN +	U67120DL2001PLC112424	Subsidiary	100

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

(i) *SHARE CAPITAL

(a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	100,000,000	47,814,430	47,814,430	47,653,880
Total amount of equity shares (in Rupees)	1,000,000,000	478,144,300	478,144,300	476,538,800

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity				
Number of equity shares	100,000,000	47,814,430	47,814,430	47,653,880
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	1,000,000,000	478,144,300	478,144,300	476,538,800

(b) Preference share capital

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

Number of classes

0

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

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

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

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
Equity shares						

At the beginning of the year	8,099,190	39,554,690	47653880	476,538,800	476,538,800	
Increase during the year	0	9,310	9310	93,100	93,100	0
i. Public Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	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	9,310	9310	93,100	93,100	
Dematerialisation of Shares						
Decrease during the year	9,310	0	9310	93,100	93,100	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify	9,310	0	9310	93,100	93,100	
Dematerialisation of Shares						
At the end of the year	8,089,880	39,564,000	47653880	476,538,800	476,538,800	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify						
Decrease during the year	0	0	0	0	0	0

i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify						
<input type="text"/>						
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)

0

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

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

Nil

[Details being provided in a CD/Digital Media]

Yes

No

Not Applicable

Separate sheet attached for details of transfers

Yes

No

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

Date of the previous annual general meeting	<input type="text"/>
Date of registration of transfer (Date Month Year)	<input type="text"/>
Type of transfer	<input type="text"/> 1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock

Number of Shares/ Debentures/ Units Transferred	<input style="width:95%;" type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input style="width:95%;" type="text"/>
Ledger Folio of Transferor <input style="width:95%;" type="text"/>			
Transferor's Name	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>
	Surname	middle name	first name
Ledger Folio of Transferee <input style="width:95%;" type="text"/>			
Transferee's Name	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>
	Surname	middle name	first name
Date of registration of transfer (Date Month Year) <input style="width:95%;" type="text"/>			
Type of transfer	<input style="width:95%;" type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	<input style="width:95%;" type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input style="width:95%;" type="text"/>
Ledger Folio of Transferor <input style="width:95%;" type="text"/>			
Transferor's Name	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>
	Surname	middle name	first name
Ledger Folio of Transferee <input style="width:95%;" type="text"/>			
Transferee's Name	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>	<input style="width:95%;" type="text"/>
	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

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

Details of debentures

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

(v) Securities (other than shares and debentures)

0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

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

(i) Turnover

5,701,383,952

(ii) Net worth of the Company

-292,524,404

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	83,787	0.18	0	
	(ii) Non-resident Indian (NRI)	1,571,223	3.3	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)	29,378,022	61.65	0	
10.	Others	0	0	0	
	Total	31,033,032	65.13	0	0

Total number of shareholders (promoters)

7

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

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	7,048,857	14.79	0	
	(ii) Non-resident Indian (NRI)	1,072	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	959,700	2.01	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	8,610,904	18.07	0	
10.	Others Clearing Members	315	0	0	
	Total	16,620,848	34.87	0	0

Total number of shareholders (other than promoters)

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

(c) *Details of Foreign institutional investors' (FIIs) holding shares of the company

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held

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

Details	At the beginning of the year	At the end of the year
Promoters	7	7
Members (other than promoters)	3,729	3,793
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	1	3	1	3	0	3.47
B. Non-Promoter	0	6	0	5	0	0
(i) Non-Independent	0	0	0	0	0	0
(ii) Independent	0	6	0	5	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	9	1	8	0	3.47

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

11

(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)
Umesh Kumar Modi	00002757	Director	1,571,223	
KUMKUM MODI	00522904	Director	28,300	
ABHISHEK MODI	00002798	Whole-time director	0	
JAYESH MODI	02849637	Director	55,487	
VIJAY KUMAR MODI	00004606	Director	0	
NARYAN PRAKASH BANSAL	00010587	Director	0	
JAGDISH CHANDER CHANDRA	05316202	Director	250	
SHYAM BABU VYAS	02025415	Director	0	
ROHIT GARG	03296571	Director	0	
ANIL KUMAR GOEL	AARPG8719M	CFO	0	
ANKIT KUMAR SRIVASTAVA	FOJPS6453D	Company Secretary	0	

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

2

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)
ANKIT KUMAR SRIVASTAVA	FOJPS6453D	Company Secretary	19/05/2020	APPOINTMENT
RAJEEV KUMAR AGARWAL	00298252	Director	05/12/2020	CESSATION

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

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

Number of meetings held

1

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
AGM	28/09/2020	3,777	35	66.33

B. BOARD MEETINGS

*Number of meetings held

5

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	28/07/2020	10	10	100
2	31/08/2020	10	6	60
3	14/09/2020	10	6	60
4	10/11/2020	10	4	40
5	11/02/2020	9	3	33.33

C. COMMITTEE MEETINGS

Number of meetings held

9

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	AUDIT COMM	28/07/2020	5	5	100
2	AUDIT COMM	31/08/2020	5	4	80
3	AUDIT COMM	14/09/2020	5	4	80
4	AUDIT COMM	10/11/2020	5	3	60
5	AUDIT COMM	11/02/2021	4	3	75
6	NOMINATION	28/07/2020	4	4	100
7	NOMINATION	31/08/2020	4	4	100

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
8	NOMINATION	14/09/2020	4	4	100
9	STAKE HOLD	28/07/2020	3	3	100

D. *ATTENDANCE OF DIRECTORS

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	
1	Umesh Kumar	5	4	80	0	0	0	
2	KUMKUM MO	5	1	20	0	0	0	
3	ABHISHEK M	5	4	80	0	0	0	
4	JAYESH MOD	5	1	20	0	0	0	
5	VIJAY KUMAF	5	5	100	8	8	100	
6	NARYAN PRA	5	4	80	9	9	100	
7	JAGDISH CHA	5	5	100	9	9	100	
8	SHYAM BABL	5	1	20	9	1	11.11	
9	ROHIT GARG	5	1	20	0	0	0	

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil

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

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

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

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

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

Number of other directors whose remuneration details to be entered

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

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

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

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

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

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status

(B) DETAILS OF COMPOUNDING OF OFFENCES Nil

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in Rupees)

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

Yes No

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

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

Name

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. ... 18 dated 28/07/2020

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

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

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

To be digitally signed by

Director

DIN of the director

00010587

To be digitally signed by

Company Secretary

Company secretary in practice

Membership number

50159

Certificate of practice number

Attachments

- 1. List of share holders, debenture holders
- 2. Approval letter for extension of AGM;
- 3. Copy of MGT-8;
- 4. Optional Attachment(s), if any

Attach
Attach
Attach
Attach

List of attachments

MGT 8 SBEC Sugar Limited.pdf

Remove attachment

Modify

Check Form

Prescrutiny

Submit

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



SONIYA GUPTA & ASSOCIATES

PRACTICING COMPANY SECRETARIES

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 SUGAR 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;
 2. Maintenance of registers/records & making entries therein within the time prescribed therefore; **Complied**
 3. Filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal Court or other authorities within/beyond the prescribed time. **Complied**

S. No.	Form Name	Filing Date	SRN	Additional Fees
1.	Form MGT-7	21.12.2020	R76272012	No Additional Fees
2.	Form AOC-4 XBRL	30.11.2020	R72850449	No Additional Fees
3.	Form MGT-14	09.10.2020	R66268715	No Additional Fees
4.	Form DPT-3	29.10.2020	R69059608	No Additional Fees
5.	Form DIR-12	11.06.2020	R41356338	No Additional Fees
6.	Form DIR-12	02.02.2021	R94186806	Yes, With Additional Fees
7.	Form DIR-12	14.08.2020	R49739816	No Additional Fees
8.	Form MSME	06.07.2020	R44604965	No Additional Fees
9.	Form MSME	03.12.2020	R73340994	No Additional Fees
10.	Form IEPF 2	14.08.2020	R49739345	No Additional Fees

11.	Form CHG-1	06.08.2020	R48659601	No Additional Fees
12.	Form MGT-14	09.10.2020	R66337593	No Additional Fees
13.	Form MGT-14	14.08.2020	R49739691	No Additional Fees
14.	Form MGT-14	07.10.2020	R65875395	No Additional Fees
15.	Form MGT-15	09.10.2020	R66264409	No Additional Fees
16.	Form CRA-4	23.12.2020	R76901784	No Additional Fees
17.	Form CRA-2	09.10.2020	R66264201	No 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**

DATE OF BOARD MEETINGS HELD DURING THE YEAR

<i>S. No.</i>	<i>Date of Board Meetings</i>
1.	28 th July 2020
2.	31 st August 2020
3.	14 th September 2020
4.	10 th November 2020
5.	11 th February 2021

The Company has re-constituted the following Committees applicable on the Company during the period under review:

- 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- **22nd September, 2020 to 28th September, 2020** (Both Days Inclusive).

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 and complied the provisions of Section 188 of the Companies Act, 2013.**

8. Transfer and/or transmission of equity shares and issue of security certificates in such instances;- **Transfer and/or transmission of equity shares have been carried out by the Registrar &**

Transfer Agent of the Company i.e. – M/s Beetal Financial & Computer Services Pvt. 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) and (5) thereof; **Complied**

12. Constitution/ appointment/ re-appointment/ retirement/ filling up causal vacancies/ disclosures of the Director, Key Managerial Personal and the remuneration paid to them,

The composition of Board of Directors of the Company during the financial year 2020-2021 are as under:

DIN	Name	Designation	Date of Appointment	Date of Cessation
00002757	Umesh Kumar Modi	Director	03/02/1995	-
00002798	Abhishek Modi	Whole time Director	13/05/1994 25.05.2019	-
00004606	Vijay Kumar Modi	Director	06/02/2015	-
00010587	Narayan Prakash Bansal	Director	18/10/2003	-
00298252	Rajeev Kumar Agarwal	Director	29/04/2015	05/12/2020
00522904	Kumkum Modi	Director	26/05/2000	
AARPG8719M	Anil Kumar Goel	CFO(KMP)	01/11/2017	
02025415	Shyam Babu Vyas	Director	27/05/2015	
02849637	Jayesh Modi	Director	18/06/2010	
03296571	Rohit Garg	Director	25/03/2016	
05316202	Jagdish Chander Chawla	Director	27/05/2015	
FOJPS6453D	Ankit Kumar Srivastava	Company Secretary	19/05/2020	

The Company has registered all its Independent Director on the Independent Director Database maintained by IICA during the year ended 31.03.2021 as required Under Companies Act 2013, except Mr. Rohit Garg, whose registration was under process during the course of audit.

13. Appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act; - **Complied**
14. Approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act; - **Not Applicable.**
15. Acceptance/ renewal/ repayment of deposits;- **During the period under review, the company has not accepted any public deposits.**
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:- **Complied**
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



(Soniya Gupta)
Proprietor
FCS: 7493
CP: 8136

Place: New Delhi

Date: 18.08.2021

UDIN: F007493C000801011