

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
- Global Location Number (GLN) of the company
- * Permanent Account Number (PAN) of the company
- (ii) (a) Name of the company
- (b) Registered office address
- 412, Floor- 4, 17G , Vardhaman Chamber,
Cawasji Patel Road, Horniman Circle, Fort,
Mumbai
Mumbai City
Maharashtra
400001
- (c) *e-mail ID of the company
- (d) *Telephone number with STD code
- (e) Website
- (iii) Date of Incorporation
- (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	BSE Limited	1
2		

(b) CIN of the Registrar and Transfer Agent

L67120TG1989PLC010188

Pre-fill

Name of the Registrar and Transfer Agent

CIL SECURITIES LIMITED

Registered office address of the Registrar and Transfer Agents

214, RAGHAVA RATNA TOWERSCHIRAG ALI LANE
ABIDS

(vii) *Financial year From date 01/04/2022 (DD/MM/YYYY) To date 31/03/2023 (DD/MM/YYYY)

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

(a) If yes, date of AGM

17/08/2023

(b) Due date of AGM

30/09/2023

(c) Whether any extension for AGM granted

Yes No

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*Number of business activities

1

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	F	Construction	F1	Buildings	0

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	MACROTECH DEVELOPERS LIM	L45200MH1995PLC093041	Holding	72.7

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	14,700,000	3,150,000	3,150,000	3,150,000
Total amount of equity shares (in Rupees)	147,000,000	31,500,000	31,500,000	31,500,000

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity Shares				
Number of equity shares	14,700,000	3,150,000	3,150,000	3,150,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	147,000,000	31,500,000	31,500,000	31,500,000

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	7,520	0	0	0
Total amount of preference shares (in rupees)	376,000	0	0	0

Number of classes

1

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
9.5% Redeemable Cumulative Preference Shares				
Number of preference shares	7,520	0	0	0
Nominal value per share (in rupees)	50	50	50	50
Total amount of preference shares (in rupees)	376,000	0	0	0

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	2,624,000

(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	83,001	3,066,999	3150000	31,500,000	31,500,000	

Increase during the year	0	1,705	1705	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	
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	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	1,705	1705	0	0	
Converted to Demat						
Decrease during the year	1,705	0	1705	0	0	0
i. Buy-back of shares	0	0	0	0	0	
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	
iv. Others, specify	1,705	0	1705	0	0	
Converted to Demat						
At the end of the year	81,296	3,068,704	3150000	31,500,000	31,500,000	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify				0	0	
NA						
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				0	0	
<input type="text" value="NA"/>						
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 / 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" value="30/04/2022"/>
Type of transfer	<input type="text" value="Equity Shares"/> 1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
Number of Shares/ Debentures/ Units Transferred	<input type="text" value="2"/> Amount per Share/ Debenture/Unit (in Rs.) <input type="text" value="10"/>

Ledger Folio of Transferor		BHL009323	
Transferor's Name	GOPALIAH		VASANTHA
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010090	
Transferee's Name	GOPALIAH		VASANTHA
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	30/04/2022
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Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
Number of Shares/ Debentures/ Units Transferred	2	Amount per Share/ Debenture/Unit (in Rs.) 10

Ledger Folio of Transferor		BHL000901	
Transferor's Name	RAMESH		BG
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010091	
Transferee's Name	RAMESH		BG
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	20/05/2022	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
Number of Shares/ Debentures/ Units Transferred	3	Amount per Share/ Debenture/Unit (in Rs.) 10

Ledger Folio of Transferor		BHL009952	
Transferor's Name	BARBHAYA	ASHOK	DAXA
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010092	
Transferee's Name	BARBHAYA		ASHOK C
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		30/07/2022	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	1	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL005294	
Transferor's Name	DADYBURJOR	HORMUSJI	NUSSERWANJI
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010093	
Transferee's Name	DADYBURJOR	RUSTOM	KHUSHROO
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		15/09/2022	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	2	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL005223	
Transferor's Name	PATEL	MOHANLAL	NILESH
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010094	
Transferee's Name	PATEL	MOHANBHAI	NILESH
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		15/11/2022	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	1	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL009689	
Transferor's Name	KHONA	LALJI	VIJAYSHINGH
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010095	
Transferee's Name	V KHONA		MINAKSHI
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		25/11/2022	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	15	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL002644	
Transferor's Name	AGARWALA	KRISHNA	HARI
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010096	
Transferee's Name	AGARWALA	KUMAR	ANKIT
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		24/03/2023	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	2	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL002102	
Transferor's Name	SANKLECHA		G CHANDRA
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010097	
Transferee's Name	SANKLECHA		CHANDRA G
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		24/03/2023	
Type of transfer	Equity Shares	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	2	Amount per Share/ Debenture/Unit (in Rs.)	10

Ledger Folio of Transferor		BHL002159	
Transferor's Name	NIRBHAILAL		GHEWERCHAND
	Surname	middle name	first name
Ledger Folio of Transferee		BHL010097	
Transferee's Name	CHANDRA		G SANKLECHA
	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/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
Ledger Folio of Transferor			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			
Transferee's Name			
	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	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0

Particulars	Number of units	Nominal value per unit	Total value
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

0

(ii) Net worth of the Company

-120,112,000

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	18,105	0.57	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	

3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	2,343,966	74.41	0	
10.	Others NA	0	0	0	
	Total	2,362,071	74.98	0	0

Total number of shareholders (promoters)

4

(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	696,785	22.12	0	
	(ii) Non-resident Indian (NRI)	471	0.01	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	32,496	1.03	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	57	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	4,644	0.15	0	

8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	51,573	1.64	0	
10.	Others HUF	1,903	0.06	0	
	Total	787,929	25.01	0	0

Total number of shareholders (other than promoters)

11,715

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

11,719

**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	4	4
Members (other than promoters)	11,441	11,719
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

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

(v) Others	0	0	0	0	0	0
Total	0	3	0	4	0	0

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

7

(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)
SANJYOT RANGNEKA	07128992	Director	0	
MANESH SAROJ JHUN	01748413	Director	0	12/07/2023
RITIKA BHALLA	09668373	Director	0	
JINESH BHARAT SHAH	08847375	Director	0	
KIRAN KOKARE	ANMPK7745H	CFO	0	
HITESHBHAI LALITBHAI	ACDPM9248D	Company Secretary	0	12/07/2023
MARTIN GODARD	AAAPG9558M	Manager	0	

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

8

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)
BHUSHAN VIPINCHAN	07484485	Director	22/07/2022	Cessation
VINOD PANALAL SHAH	00127085	Director	29/08/2022	Cessation
MANESH SAROJ JHUN	01748413	Additional director	22/07/2022	Appointment
RITIKA BHALLA	09668373	Additional director	22/07/2022	Appointment
JINESH BHARAT SHAH	09668373	Additional director	22/07/2022	Appointment
MANESH SAROJ JHUN	01748413	Director	30/09/2022	Change in designation
RITIKA BHALLA	09668373	Director	30/09/2022	Change in designation
JINESH BHARAT SHAH	09668373	Director	30/09/2022	Change in designation

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
Annual General Meeting	30/09/2022	11,764	34	78.41

B. BOARD MEETINGS

*Number of meetings held

6

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	14/04/2022	3	3	100
2	12/07/2022	3	3	100
3	22/07/2022	6	6	100
4	29/08/2022	5	5	100
5	12/10/2022	4	4	100
6	11/01/2023	4	4	100

C. COMMITTEE MEETINGS

Number of meetings held

8

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	14/04/2022	3	3	100
2	Audit Committee	12/07/2022	3	3	100
3	Audit Committee	12/10/2022	3	3	100
4	Audit Committee	11/01/2023	3	3	100
5	Nomination and Remuneration	22/07/2022	3	3	100
6	Stakeholders Forum	14/04/2022	3	3	100
7	Stakeholders Forum	12/07/2022	3	3	100
8	Stakeholders Forum	11/01/2023	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	17/08/2023
								(Y/N/NA)
1	SANJYOT RA	6	6	100	8	8	100	Yes
2	MANESH SAF	4	4	100	0	0	0	Not Applicable
3	RITIKA BHALI	4	4	100	3	3	100	Yes
4	JINESH BHAF	4	4	100	3	3	100	Yes

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil

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

0

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

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	Kiran Kokare	CFO	0	0	0	225,201	225,201
2	Hitesh Marthak	Company Secre	0	0	0	328,005	328,005
	Total		0	0	0	553,206	553,206

Number of other directors whose remuneration details to be entered

4

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/Sweat equity	Others	Total Amount
1	Ritika Bhalla	Independent Dir	0	55,000	0	0	55,000
2	JINESH BHARAT S	Independent Dir	0	55,000	0	0	55,000
3	Bhushan Shah	Independent Dir	0	47,500	0	0	47,500
4	Vinod Shah	Independent Dir	0	47,500	0	0	47,500

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
	Total		0	205,000	0	0	205,000

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

(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

Shravan A. Gupta

Whether associate or fellow

Associate Fellow

Certificate of practice number

9990

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. .. dated

(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

SANJYOT NILESH RANGNEKAR	Digitally signed by SANJYOT NILESH RANGNEKAR Date: 2023.10.13 15:41:40 +05'30'
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DIN of the director

To be digitally signed by

SHASHAN K NAGAR	Digitally signed by SHASHANK NAGAR Date: 2023.10.13 15:42:25 +05'30'
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- Company Secretary
- Company secretary in practice

Membership number

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

-
-
-
-

List of attachments

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 **SANATHNAGAR ENTERPRISES LIMITED** (here-in-after referred to as "the Company") as required to be maintained under the Companies Act, 2013 ('the Act') and the rules made thereunder for the financial year ended on March 31, 2023. 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, wherever applicable, in respect of:
1. its status under the Act;
 2. maintenance of registers/records & making entries therein within the time prescribed therefore;
 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 (wherever required) within the prescribed time;
 4. calling/ convening/ holding meetings of Board of Directors or its Committees, if any, and the meetings of the members of the Company on dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including circular resolutions and the 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;
 5. closure of Register of Members/ Security holders as the case may be;
 6. signing of audited financial statements as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3) and (5) thereof;
 7. advances / loans given to Company as referred in section 185 of the Act;
 8. contracts/ arrangements with related parties as specified in Section 188 of the Act;
 9. issue or allotment or transfer or transmission of securities or buy back of securities/ redemption of preference shares or debentures alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
 10. 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;
 11. 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;
 12. constitution/ appointment/ re-appointments/ retirement/ filling of casual vacancies / resignations/ disclosure of the Directors, Key Management Personnel and the remuneration paid to them;

13. appointment /reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
14. approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or other authorities under the provisions of the Act;
15. acceptance/ renewal/ repayment of deposits;
16. borrowings from directors, members, public financial Institutions, banks and others, and creation/ modification/satisfaction of charges in that respect, wherever applicable;
17. 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; and
18. alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

Shravan A. Gupta & Associates
Practicing Company Secretary



Shravan A. Gupta
ACS: 27484, CP No.: 9990
UDIN: A027484E001096618
Peer Review Cert. No:2140/2022
Place: Mumbai
Date: 27/09/2023