

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

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (C	N) of the company	L27104	GJ1972PLC085827	Pre-fill
Global Location Number (GLN) of t	he company			
* Permanent Account Number (PAN)) of the company	AAACW	/1408K	
(ii) (a) Name of the company		WELCA	ST STEELS LIMITED	
(b) Registered office address				
115-116, G.V.M.M. ESTATE, ODHAV ROAD, ODHAV, AHMEDABAD Ahmedabad Gujarat			3	
(c) *e-mail ID of the company		snj@aia	engineering.com	
(d) *Telephone number with STD co	de	079229	01078	
(e) Website		www.w	elcaststeels.com	
(iii) Date of Incorporation		28/02/	1972	
(iv) Type of the Company	Category of the Company		Sub-category of the G	Company
Public Company Company limited by sha		shares Indian Non-Gov		ernment company
(v) Whether company is having share ca	ipital 💿 `	Yes	 ○ No	

O No

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

(a) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	BSE Limited	1

(b) CIN of the Registrar and Trai	nsfer Agent		U99999MF	I1994PTC076534	Pre-fill
Name of the Registrar and Trar	sfer Agent				
BIGSHARE SERVICES PRIVATE LIM	ITED				
Registered office address of the	e Registrar and Tra	ansfer Agents			
E-3 ANSA INDUSTRIAL ESTATESAI SAKINAKA	KI VIHAR ROAD				
(vii) *Financial year From date 01/04	4/2020	(DD/MM/YYYY)	To date	31/03/2021) (DD/MM/YYYY)
(viii) *Whether Annual general meeting	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	0	Yes	No	
II. PRINCIPAL BUSINESS AC	TIVITIES OF T	HE COMPAN	Y		

*Number of business activities 1

S.No	Main Activity group code		Business Activity Code		% of turnover of the company
1	с	Manufacturing	C7	Metal and metal products	100

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		L29259GJ1991PLC015182		74.85

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	2,000,000	638,586	638,586	638,161
Total amount of equity shares (in Rupees)	20,000,000	6,385,860	6,385,860	6,381,610

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital	
Number of equity shares	2,000,000	638,586	638,586	638,161	
Nominal value per share (in rupees)	10	10	10	10	
Total amount of equity shares (in rupees)	20,000,000	6,385,860	6,385,860	6,381,610	

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(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

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

0

(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				
At the beginning of the year	638,161	6,381,610	6,381,610	

Increase during the year	0	0	0	0
i. Pubic Issues		0	0	
	0	0	0	0
ii. Rights issue	0	0	0	0
iii. Bonus issue	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0
v. ESOPs	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0
vii. Conversion of Preference share	0	0	0	0
viii. Conversion of Debentures	0	0	0	0
ix. GDRs/ADRs	0	0	0	0
x. Others, specify				
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				
At the end of the year	638,161	6,381,610	6,381,610	
Preference shares				
At the beginning of the year	0	0	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				
Decrease during the year	0	0	0	0

ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify				
At the end of the year	0	0	0	
(ii) Details of stock split/consolidation during the	year (for each class of	f shares)	0	

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

\boxtimes	Nil			
	[Details being provided in a CD/Digital Media]	⊖ Yes	O No	O 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				
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 o	f transfer (Date Month)	Year)		
Type of transfe	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock			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 Trans	sferee			·
Transferee's Name				
	Surname		middle name	first name

(iv) *Indebtedness including 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
Secured Loans (including interest outstanding/accrued but not due for payment) excluding deposits			34,730,000
Unsecured Loans (including interest outstanding/accrued but not due for payment) excluding deposits			0
Deposit			0
Total			34,730,000

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 depentures)

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

979,541,582

(ii) Net worth of the Company

327,604,149

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity	Preference

		Number of shares	Percentage	Number of shares	Percentag
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	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)	477,661	74.85	0	
10.	Others	0	0	0	
	Tota	al 477,661	74.85	0	0

Total number of shareholders (promoters)

(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	135,095	21.17	0	
	(ii) Non-resident Indian (NRI)	1,560	0.24	0	
	(iii) Foreign national (other than NRI)	0	0	0	

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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	50	0.01	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)	2,806	0.44	0	
10.	Others IEPF, Clearing Member, HUI	20,989	3.29	0	
	Total	160,500	25.15	0	0

Total number of shareholders (other than promoters)

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

1,869	
1,870	

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	1	1
Members (other than promoters)	1,942	1,869
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	8	0	8	0	0
(i) Non-Independent	0	3	0	3	0	0
(ii) Independent	0	5	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	0	8	0	8	0	0

Number of Directors and Key managerial personnel (who is not director) as on the financial year end date 11

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(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)
VINOD NARAIN	00058280	Director	10	
DEBI PRASAD DHANU	00168198	Director	0	
BHADRESH KANTILAL	00058177	Director	0	
PRADIP RASIKLAL SH,	00293396	Director	0	
SANJAY SHAILESHBH.	00091305	Director	0	
ASHOK ASHARAM NIC	02249844	Director	0	
KHUSHALI SAMIP SOL	07008918	Director	0	
RAJENDRA SHANTILA	00061922	Director	0	
VUTUKURU VENKATA	AANPR6398H	CEO	0	
YASH RAJ	ABHPR4953R	CFO	0	
SATYANARAYAN CHH	ABLPJ6305K	Company Secretar	0	

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

0

Name	beginning / during	ichange in designation/	Nature of change (Appointment/ Change in designation/ 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		
		C C		% of total shareholding	
Annual General Meeting	14/09/2020	1,973	20	77.44	

B. BOARD MEETINGS

*Number of meetings held

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S. No.	Date of meeting	Total Number of directors associated as on the date			
		of meeting	Number of directors attended	% of attendance	
1	15/06/2020	8	8	100	
2	08/08/2020	8	8	100	
3	31/08/2020	8	7	87.5	
4	29/10/2020	8	7	87.5	
5	05/02/2021	8	7	87.5	

C. COMMITTEE MEETINGS

Nur	mber of meeting	gs held		9			
	S. No.	Type of meeting		Total Number of Members as	Attendance		
			Date of meeting	on the date of the meeting	Number of members attended	% of attendance	
	1	Audit Committe	15/06/2020	6	6	100	
	2	Audit Committe	08/08/2020	6	6	100	
	3	Audit Committe	29/10/2020	6	5	83.33	
	4	Audit Committe	05/02/2021	6	5	83.33	

S. No.	S. No. Type of meeting Date of meeting		Total Number of Members as	Attendance		
		on the date of	Number of members attended	% of attendance		
5	Stakeholder R	15/06/2020	5	5	100	
6	Stakeholder R	08/08/2020	5	5	100	
7	Stakeholder R	29/10/2020	5	5	100	
8	Stakeholder R	05/02/2021	5	4	80	
9	Nomination an		3	3	100	

D. *ATTENDANCE OF DIRECTORS

	of the director	Board Meetings			Committee Meetings			Whether attended AGM
			Number of Meetings			Number of Meetings	% of attendance	held on
	entitled to attend	attended	allendance	entitled to attend	attended		(Y/N/NA)	
1	VINOD NARA	5	5	100	4	4	100	
2	DEBI PRASAI	5	5	100	8	8	100	
3	BHADRESH K	5	5	100	9	9	100	
4	PRADIP RASI	5	5	100	9	9	100	
5	SANJAY SHA	5	4	80	9	7	77.78	
6	ASHOK ASHA	5	5	100	4	4	100	
7	KHUSHALI SA	5	5	100	0	0	0	
8	RAJENDRA S	5	4	80	4	3	75	

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
 Image: Comparison of the second second

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	VUTUKURU VENK/	CEO	2,935,804	0	0	0	2,935,804
2	YASH RAJ	CFO	2,720,283	0	0	0	2,720,283
	Total		5,656,087	0	0	0	5,656,087
Number of other directors whose remuneration details to be entered						8	
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	VINOD NARAIN	DIRECTOR	0	0	0	195,000	195,000
2	BHADRESH KANTI	DIRECTOR	0	0	0	115,000	115,000
2						,	-,

	±						
3	RAJENDRA SHAN1	DIRECTOR	0	0	0	75,000	75,000
4	SANJAY SHAILESH	DIRECTOR	0	0	0	90,000	90,000
5	DEBI PRASAD DH/	DIRECTOR	0	0	0	115,000	115,000
6	PRADIP RASIKLAL	DIRECTOR	0	0	0	115,000	115,000
7	ASHOK ASHARAM	DIRECTOR	0	0	0	115,000	115,000
8	KHUSHALI SAMIP	DIRECTOR	0	0	0	75,000	75,000
	Total		0	0	0	895,000	895,000

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

		Date of Order		Details of appeal (if any) including present status
(B) DETAILS OF CO	MPOUNDING OF OF	FENCES 📈 N	il	

Name of the	Name of the court/ concerned Authority	Isection Linder Which	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	TUSHAR VORA
Whether associate or fellow	Associate Fellow
Certificate of practice number	1745

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 23/05/2007

(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.

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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	00058177
To be digitally signed by	

O Company secretary in practice		
Membership number 5343		
Attachments		List of attachments
1. List of share holders, debenture holders	Attach	
2. Approval letter for extension of AGM;	Attach	
3. Copy of MGT-8;	Attach	
4. Optional Attachement(s), if any	Attach	
		Remove attachment
Modify Check F	orm Prescrutiny	Submit

Company Secretary

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

We have examined the registers, records and books and papers of WELCAST STEEL 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 31st March, 2021. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the Company, its officers and agents, we 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;

The Company has complied with the provisions of the Act in respect of its status under the Act.

2. Maintenance of registers/records & making entries therein within the time prescribed therefore;

The Company has maintained registers/records & has made 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 within / beyond the prescribed time;

The Company has filed forms and returns with the Registrar of Companies within / beyond the prescribed time. During the period under review, the Company was not required to file any form with Regional Director, Central Government, Tribunal, Court or other authorities.

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;

In respect of calling/ convening/ holding meetings of Board of Directors or its committees and the meetings of the members of the Company on due dates as stated in the annual return, we have to state that in respect of such meetings, proper notices were given and the proceedings including circular resolution 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.

The Company has not closed the Register of members during the year review.

^{32,} Arpan Society, Nr. Mayur High School, Paliyad Nagar, Naranpura, Ahmedabad – 380013 Phone : 079-2791 2121, Mobile : 98258 45205, E-mail : cstusharvora@gmail.com

6. Advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;

The Company has not made any loans / advances to its directors and/or persons or firms or Companies referred in section 185 of the Act.

7. Contracts/arrangements with related parties as specified in section 188 of the Act;

During the financial year, the Company has made contracts / arrangements / transactions with related parties as defined under Section 188 of the Companies Act, 2013. The management has claimed that all contracts / arrangements / transactions are carried in the ordinary course of business and on Arm's Length Basis and conducted as if such contracts etc. are entered into between such related parties as if they are unrelated so that there is no conflict of interest and the same were recorded in the Minutes Book of the Company by the management claiming as such.

8. Issue or allotment or transfer or transmission 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;

The Company has only one kind of security i.e. equity share. There was neither allotment nor buyback of shares / alteration or reduction of share capital / conversion of shares during the financial year. In respect of transfer / transmission of shares and issue of certificates thereof, the Company has complied with the provisions of the Act.

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

The Company was not required to keep in abeyance the rights to dividend in respect of any shares. The Company has not made any rights / bonus issue of shares during the financial year.

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;

The Company has not declared any dividend during the year under certification. The Company has complied with the provisions of the Act and the rules made there under in respect of transfer of unpaid/ unclaimed dividend to the Investor Education and Protection Fund in accordance with applicable provisions of the Act.

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;

The Company has complied with the provisions of Section 134 of the Act in respect of signing of audited financial statement and signing of Report of Directors is as per sub - sections (3), (4) and (5) thereof.

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

The Company has complied with the provisions of the Act in respect of constitution / appointment / re-appointments / retirement / disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them.

32, Arpan Society, Nr. Mayur High School, Paliyad Nagar, Naranpura, Ahmedabad – 380013 Phone : 079-2791 2121, Mobile : 98258 45205, E-mail : cstusharvora@gmail.com 13. Appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;

The Company has complied with the provisions as to appointment 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 such other authorities under the various provisions of the Act;

The Company was not required to obtain approvals of Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act.

15. Acceptance/ renewal/ repayment of deposits;

The Company has neither accepted/renewed deposits nor required to repay the same during the financial year.

16. Borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;

The Company has complied with the provisions relating to borrowings from its 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;

The loans and investments or guarantees given or providing of securities to other bodies corporate or persons is in compliance with the provisions of section 186 of the Act, wherever applicable.

18. Alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

The Company has not altered the provisions of the Memorandum of Association and Articles of Association of the Company during the year under review.

Place: Ahmedabad

Date: 22nd May, 2021

FOR TUSHAR VORA & ASSOCIATES COMPANY SECRETARIES

TUSHAR M. VORA PROPRIETOR C.O.P. NO. : 1745. UDIN: **F003459C000358693**