

Form No. MGT-7

Form language

 English Hindi**Annual Return (other than OPCs and Small Companies)**

[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]

All fields marked in * are mandatory

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN)

L74899DL1995PLC064007

ii (a) *Financial year for which the annual return is being filed (From date) (DD/MM/YYYY)

01/04/2024

(b) *Financial year for which the annual return is being filed (To date) (DD/MM/YYYY)

31/03/2025

(c) *Type of Annual filing

 Original Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

Particulars	As on filing date	As on the financial year end date
Name of the company	GRM OVERSEAS LIMITED	GRM OVERSEAS LIMITED
Registered office address	128, FIRST FLOOR, SHIVA MARKET,NA,PITAMPURA, North Delhi,Delhi,India,110034	128, FIRST FLOOR, SHIVA MARKET,NA,PITAMPURA, North Delhi,Delhi,India,110034
Latitude details	28.701112	28.701112
Longitude details	77.128724	77.128724

(a) *Photograph of the registered office of the Company showing external building and name prominently visible

Delhi Regd office pics.pdf

(b) *Permanent Account Number (PAN) of the company

AA*****9L

(c) *e-mail ID of the company

*****tor.relations@grmrice.com

(d) *Telephone number with STD code

01*****30

(e) Website

www.grmrice.com

iv *Date of Incorporation (DD/MM/YYYY)

03/01/1995

v (a) *Class of Company (as on the financial year end date)

(Private company/Public Company/One Person Company)

Public company

(b) *Category of the Company (as on the financial year end date)

(Company limited by shares/Company limited by guarantee/Unlimited company)

Company limited by shares

(c) *Sub-category of the Company (as on the financial year end date)

(Indian Non-Government company/Union Government Company/State Government Company/
Guarantee and association company/Subsidiary of Foreign Company)

Indian Non-Government company

vi *Whether company is having share capital (as on the financial year end date)

Yes

No

vii (a) Whether shares listed on recognized Stock Exchange(s)

Yes

No

(b) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)
2	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)

viii Number of Registrar and Transfer Agent

1

CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent
U74899DL1973PLC006950	MAS SERVICES LTD	T-34, 2nd Floor, Okhla Industrial Area, Phase - II, New Delhi, Delhi, India, 110020	INR000000049

ix * (a) Whether Annual General Meeting (AGM) held

Yes

No

(b) If yes, date of AGM (DD/MM/YYYY)

29/09/2025

(c) Due date of AGM (DD/MM/YYYY)

30/09/2025

(d) Whether any extension for AGM granted

Yes

No

(e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *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	C	Manufacturing	10	Manufacture of Food products	100

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

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

3

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1		10474555	GRM INTERNATIONAL HOLDINGS LTD	Subsidiary	100
2		0101049673	GRM FINE FOODS INC.	Subsidiary	100
3	U01100DL2020PTC365723		GRM FOODKRAFT PRIVATE LIMITED	Subsidiary	91.48

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	100000000.00	60000000.00	60000000.00	60000000.00

Total amount of equity shares (in rupees)	200000000.00	120000000.00	120000000.00	120000000.00
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Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Equity Shares				
Number of equity shares	100000000	60000000	60000000	60000000
Nominal value per share (in rupees)	2	2	2	2
Total amount of equity shares (in rupees)	200000000	120000000	120000000	120000000

(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

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
(i) Equity shares						
At the beginning of the year	157000	59843000	60000000.00	120000000	120000000	
Increase during the year	0.00	7500.00	7500.00	15000.00	15000.00	0
i Public Issues	0	0	0.00	0	0	
ii Rights issue	0	0	0.00	0	0	
iii Bonus issue	0	0	0.00	0	0	
iv Private Placement/ Preferential allotment	0	0	0.00	0	0	
v ESOPs	0	0	0.00	0	0	
vi Sweat equity shares allotted	0	0	0.00	0	0	
vii Conversion of Preference share	0	0	0.00	0	0	
viii Conversion of Debentures	0	0	0.00	0	0	
ix GDRs/ADRs	0	0	0.00	0	0	
x Others, specify						
Demat of Physical Shares	0	7500	7500.00	15000	15000	
Decrease during the year	7500.00	0.00	7500.00	15000.00	15000.00	0
i Buy-back of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify						
DEMAT OF PHYSICAL SHARES	7500	0	7500.00	15000	15000	
At the end of the year	149500.00	59850500.00	60000000.00	120000000.00	120000000.00	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Issues of shares	0	0	0.00	0	0	
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify <input type="text"/>			0			
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Redemption of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify <input type="text" value="NA"/>	0	0	0.00	0	0	
At the end of the year	0.00	0.00	0.00	0.00	0.00	

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		<input type="text"/>
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

Number of transfers

Attachments:

1. Details of shares/Debentures Transfers

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

(a) Non-convertible debentures

*Number of classes

0

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of non-convertible 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
Total				

(b) Partly convertible debentures

*Number of classes

0

Classes of partly convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of partly convertible 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

Total				
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(c) Fully convertible debentures

*Number of classes

0

Classes of fully convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of fully convertible 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
Total				

(d) Summary of Indebtedness

Particulars	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	0.00	0.00	0.00	0.00
Partly convertible debentures	0.00	0.00	0.00	0.00
Fully convertible debentures	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00

v Securities (other than shares and debentures)

1

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Convertible Warrants	69070000	2	138140000	0.50	0.5
Total	69070000		138140000		0.5

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

i *Turnover

9131468280.78

ii * Net worth of the Company

3916356260

VI SHARE HOLDING PATTERN**A Promoters**

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	43458984	72.43	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00

9	Body corporate (not mentioned above)	0	0.00	0	0.00
10	Others <input type="text"/>				
	Total	43458984.00	72.43	0.00	0

Total number of shareholders (promoters)

B Public/Other than promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	11392952	18.99	0	0.00
	(ii) Non-resident Indian (NRI)	260685	0.43	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	432400	0.72	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	150000	0.25	0	0.00

9	Body corporate (not mentioned above)	1133876	1.89	0	0.00
10	Others IEPF & Clearing Memb	3171103	5.29		
	Total	16541016.00	27.57	0.00	0

Total number of shareholders (other than promoters)

28394

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

28397.00

Breakup of total number of shareholders (Promoters + Other than promoters)

Sl.No	Category	
1	Individual - Female	4648
2	Individual - Male	23592
3	Individual - Transgender	0
4	Other than individuals	157
	Total	28397.00

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

9

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held
TIZIANA GMBH	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAYGOREGAON (EAST), MUMBAI 400063	01/01/2001	United Arab Emirates	9900	0.017
AMERICAN CENTURY ETF TRUST-AVANTIS EMERGING M	HSBC SECURITIES SERVICES 11TH FLOOR, BLDG 3, NESCO - IT PARK NESCO COMPLEX, W.E. HIGHWAYGOREGAON (EAST), MUMBAI 400063	01/01/2001	United Arab Emirates	511	0.001

RED BAY LTD	DEUTSCHE BANK AG DB HOUSE,HAZARIMAL SOMANI MARG POST BOX NO., 1142, FORT MUMBAI 400001	01/01/2001	United Arab Emirates	11564	0.019
BNP PARIBAS FINANCIAL MARKETS - ODI	BNP PARIBAS HOUSE 1 NORTH AVENUE,MAKER MAXITY BANDRA KURLA COMPLEX,, BANDRA EAST MUMBAI 400051	01/01/2001	United Arab Emirates	6	0.001
COPTHALL MAURITIUS INVESTMENT LIMITED - ODI A	JP MORGAN CHASE BANK N.A, INDIA, SUB CUSTODY 3RD FLR,JP MORGAN, TOWER,OFF CST ROAD KALINA,SANTACRUZ - EAST, MUMBAI 400098	01/01/2001	United Arab Emirates	26	0.001
QUADRATURE CAPITAL VECTOR SP LIMITED	JP MORGAN CHASE BANK N.A, INDIA, SUB CUSTODY 3RD FLR,JP MORGAN, TOWER,OFF CST ROAD KALINA,SANTACRUZ - EAST, MUMBAI 400098	01/01/2001	United Arab Emirates	120379	0.201
CITADEL SECURITIES SINGAPORE PTE. LIMITED	JP MORGAN CHASE BANK N.A, INDIA, SUB CUSTODY 3RD FLR,JP MORGAN, TOWER,OFF CST ROAD KALINA,SANTACRUZ - EAST, MUMBAI 400098	01/01/2001	United Arab Emirates	15	0.001
SOMERVILLE TRADING ENTERPRISES, LLC	JP MORGAN CHASE BANK N.A, INDIA, SUB CUSTODY 3RD FLR,JP MORGAN, TOWER,OFF CST ROAD KALINA,SANTACRUZ - EAST, MUMBAI 400098	01/01/2001	United Arab Emirates	284999	0.475
EMINENCE GLOBAL FUND PCC- EUBILIA CAPITAL PAR	ORBIS FINANCIAL CORPORATION LTD 4, A, OCUS TECHNOPOLIS, GOLF CLUB ROAD, SECTOR-54 GURGAON 122002	01/01/2001	United Arab Emirates	5000	0.008

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS

[Details of Promoters, Members (other than promoters), Debenture holders]

Details	At the beginning of the year	At the end of the year
Promoters	3	3
Members (other than promoters)	26024	28394

Debenture holders	0	0
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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	2	1	2	1	47.43	25.01
B Non-Promoter	0	5	0	5	0.00	0.00
i Non-Independent	0	1	0	1	0	0
ii Independent	0	4	0	4	0	0
C Nominee Directors representing	0	0	0	0	0.00	0.00
i. Banks and 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	2	6	2	6	47.43	25.01

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

10

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

Name	DIN/PAN	Designation	Number of equity shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
HUKAM CHAND GARG	00673276	Director	15003000	
ATUL GARG	02380612	Managing Director	14530389	

MAMTA GARG	05110727	Director	13925295	
NIPUN JAIN	01075283	Director	0	
RAJ KUMAR GARG	08213680	Director	0	
GAUTAM GUPTA	08519079	Director	0	
. NIDHI	09270573	Director	0	
TARUN SINGH	07753782	Director	0	
VEDANT GARG	CGXPG3398E	CFO	0	
SACHIN NARANG	BBRPN5243D	Company Secretary	0	

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

1

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation (DD/MM/YYYY)	Nature of change (Appointment/ Change in designation/ Cessation)
GAUTAM GUPTA	08519079	Director	14/08/2024	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

2

Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Extra Ordinary General Meeting	13/07/2024	26225	127	72.89
Annual General Meeting	28/09/2024	34509	145	72.96

B BOARD MEETINGS

*Number of meetings held

14

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	16/04/2024	8	7	87.5
2	07/05/2024	8	7	87.5
3	29/05/2024	8	8	100
4	21/06/2024	8	7	87.5
5	08/08/2024	8	8	100
6	12/08/2024	8	8	100
7	26/08/2024	8	7	87.5
8	28/08/2024	8	7	87.5
9	25/09/2024	8	7	87.5
10	02/11/2024	8	7	87.5
11	13/11/2024	8	8	100
12	02/12/2024	8	7	87.5
13	17/12/2024	8	8	100
14	13/02/2025	8	8	100

C COMMITTEE MEETINGS

Number of meetings held

14

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee Meeting	29/05/2024	3	3	100
2	Audit Committee Meeting	08/08/2024	3	3	100

3	Audit Committee Meeting	12/08/2024	3	3	100
4	Nomination and remuneration committee meeting	29/05/2024	3	3	100
5	Nomination and remuneration committee meeting	12/08/2024	3	3	100
6	Risk Management Committee Meeting	12/08/2024	3	3	100
7	Corporate Social Responsibility Committee Meeting	12/08/2024	3	3	100
8	Audit Committee Meeting	13/11/2024	3	3	100
9	Audit Committee Meeting	13/02/2025	3	3	100
10	Nomination and remuneration committee meeting	02/12/2024	3	3	100
11	Risk Management Committee Meeting	13/11/2024	3	3	100
12	Risk Management Committee Meeting	13/02/2025	3	3	100
13	Stakeholders Relationship Committee	13/02/2025	3	3	100
14	Corporate Social Responsibility Committee	13/11/2024	3	3	100

D ATTENDANCE OF DIRECTORS

S. No	Name of the Director	Board Meetings			Committee Meetings			Whether attended AGM held on (Y/N/NA)
		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	
								29/09/2025
1	0. NIDHI	14	14	100	14	14	100	No
2	TARUN SINGH	14	14	100	0	0	0	Yes
3	HUKAM CHAND GARG	14	6	42	0	0	0	Yes

4	ATUL GARG	14	14	100	2	2	100	Yes
5	MAMTA GARG	14	14	100	2	2	100	Yes
6	NIPUN JAIN	14	14	100	0	0	0	Yes
7	RAJ KUMAR GARG	14	14	100	12	12	100	Yes
8	GAUTAM GUPTA	14	14	100	12	12	100	No

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil

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

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Atul Garg	Managing Director	16800000	0	0	0	16800000.00
2	Mamta Garg	Whole-time director	9600000	0	0	0	9600000.00
	Total		26400000.00	0.00	0.00	0.00	26400000.00

B *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	Vedant Garg	CFO	9600000	0	0	0	9600000.00
2	Sachin Narang	Company Secretary	617000	0	0	0	617000.00
	Total		10217000.00	0.00	0.00	0.00	10217000.00

C *Number of other directors whose remuneration details to be entered

0

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
	Total		0.00	0.00	0.00	0.00	0.00

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

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XII PENALTY AND PUNISHMENT – DETAILS THEREOF

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

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Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order (DD/MM/YYYY)	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

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

XIII Details of Shareholder / Debenture holder

Number of shareholder/ debenture holder

28403

XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or Debenture holder (1).xls
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(b) Optional Attachment(s), if any

CLARIFICATION LETTER.pdf
MGT-8_GRM Overseas_2024-
2025 (1).pdf

XV 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.

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 applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of GRM OVERSEAS LIMITED as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ 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;
- 2 maintenance of registers/records & making entries therein within the time prescribed therefor;
- 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;
- 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;
- 5 closure of Register of Members / Security holders, as the case may be.
- 6 advances/loans 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;
- 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;
- 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
- 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;
- 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;
- 12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial 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 such other

- authorities under the various provisions of the Act;
- 15 acceptance/ renewal/ repayment of deposits;
- 16 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 ;
- 18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

Devesh Arora

Date (DD/MM/YYYY)

16/01/2026

Place

New Delhi

Whether associate or fellow:

Associate Fellow

Certificate of practice number

1*8*0

XVI Declaration under Rule 9(4) of the Companies (Management and Administration) Rules, 2014

*(a) DIN/PAN/Membership number of Designated Person

02380612

*(b) Name of the Designated Person

ATUL GARG

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* dated*
(DD/MM/YYYY) to sign this form and declare that all the requirements of 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.

***To be digitally signed by**

*Designation

(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))

Director

*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator

0*3*0*1*

***To be digitally signed by**

Company Secretary Company secretary in practice

*Whether associate or fellow:

Associate Fellow

Membership number

6*5*5

Certificate of practice number

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

For office use only:

eForm Service request number (SRN)

AC1345766

eForm filing date (DD/MM/YYYY)

16/01/2026

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