

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]



सत्यमेव जयते

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

L72300TN1993PLC101852

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AABCP6266D

(ii) (a) Name of the company

SECUREKLOUD TECHNOLOGIE

(b) Registered office address

No.37 & 38, ASV Ramana Towers, 5th Floor,
Venkat Narayana Road, T.Nagar
Chennai
Chennai
Tamil Nadu
600017

(c) *e-mail ID of the company

CS*****@UD.COM

(d) *Telephone number with STD code

04*****00

(e) Website

www.securecloud.com

(iii) Date of Incorporation

26/05/1993

(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	National Stock Exchange of India	1,024

(b) CIN of the Registrar and Transfer Agent

U67190MH1994PTC079160

Pre-fill

Name of the Registrar and Transfer Agent

ADROIT CORPORATE SERVICES P LTD

Registered office address of the Registrar and Transfer Agents

18-20, JAFERBHOY INDUSTRIAL ESTATE, MAKWANA ROAD
MAROL NAKA, ANDHERI (E),

(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	J	Information and communication	J6	Computer programming, consultancy and related activities	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	SecureKloud Technologies Inc		Subsidiary	60.71
2	Healthcare Triangle Inc		Subsidiary	32.75

3	Devcool Inc		Subsidiary	32.75
4	SecureKloud Technologies Inc		Subsidiary	60.71
5	Nexage Technologies Inc		Subsidiary	60.71
6	Blockedge Technologies Inc		Subsidiary	100
7	Mentor Minds Solutions and Se		Subsidiary	100
8	Healthcare Triangle Private Lin	U72900TN2020PTC133821	Subsidiary	99.99

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	60,000,000	33,410,605	33,410,605	33,410,605
Total amount of equity shares (in Rupees)	300,000,000	167,053,025	167,053,025	167,053,025

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
EQUITY SHARES				
Number of equity shares	60,000,000	33,410,605	33,410,605	33,410,605
Nominal value per share (in rupees)	5	5	5	5
Total amount of equity shares (in rupees)	300,000,000	167,053,025	167,053,025	167,053,025

(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	174	33,410,431	33410605	167,053,025	167,053,025	
Increase during the year	191	3	194	0	0	0
i. Public Issues	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	191	3	194			
conversion of physical into demat and demat into physical						
Decrease during the year	3	191	194	0	0	0
i. Buy-back 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	3	191	194			
conversion of physical into demat and demat into pl						
At the end of the year	362	33,410,243	33410605	167,053,025	167,053,025	
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	
NIL						
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	
NIL						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company

INE650K01021

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

Ledger Folio of Transferee	<input type="text"/>
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Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)	<input type="text"/>
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Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
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Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
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Ledger Folio of Transferor		<input type="text"/>		
Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>	
	Surname	middle name	first name	
Ledger Folio of Transferee		<input type="text"/>		
Transferee's Name	<input type="text"/>	<input type="text"/>	<input 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	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	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	<input type="text"/>		<input type="text"/>		<input type="text"/>

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

(i) Turnover

502,292,334.46

(ii) Net worth of the Company

793,512,929.27

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	465,000	1.39	0	
	(ii) Non-resident Indian (NRI)	14,074,703	42.13	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)	0	0	0	
10.	Others Nil	0	0	0	
	Total	14,539,703	43.52	0	0

Total number of shareholders (promoters)

2

(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	16,526,346	49.46	0	
	(ii) Non-resident Indian (NRI)	2,124,444	6.36	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)	212,297	0.64	0	
10.	Others FPI, Trust, Clearing Member	7,815	0.02	0	
	Total	18,870,902	56.48	0	0

Total number of shareholders (other than promoters)

25,420

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

25,422

**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	2	2
Members (other than promoters)	27,715	25,420
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	1	0	42.13	0
B. Non-Promoter	2	5	1	4	0	0
(i) Non-Independent	2	1	1	1	0	0
(ii) Independent	0	4	0	3	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	2	5	2	4	42.13	0

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

8

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

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
SURESH VENKATACH	00365522	Director	14,074,703	
SRINIVAS MAHANKAL	01884823	Whole-time directo	50	
MAYAKESAVAN VIJA'	01896931	Director	0	
BIJU CHANDRAN	06540000	Director	0	
VEERAVALLI VARADH	00879266	Director	0	
PANCHI SAMUTHIRAI	09205373	Director	0	
SOUNDARARAJAN RA	03275562	CFO	0	

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
Roshini Selvakumar	HEZPS8341C	Company Secretar	0	09/05/2024

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

7

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)
Babita Singaram	07482106	Director	29/05/2023	Cessation
Venkateshwaran Ba	06616155	Director	29/05/2023	Change in Designation
Panchi Samuthiraka	09205373	Director	26/06/2023	Appointment
Suresh Venkatachar	00365522	CEO	07/02/2024	Appointment
Ramachandran S	03275562	CFO	07/02/2024	Appointment
Thyagarajan Ramac	00942326	CFO	07/02/2024	Cessation
Venkateshwaran Ba	06616155	Director	31/03/2024	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
Annual General Meeting	26/09/2023	27,535	49	1.23

B. BOARD MEETINGS

*Number of meetings held

9

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	29/05/2023	6	6	100
2	26/06/2023	6	5	83.33
3	10/08/2023	7	7	100

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
4	21/08/2023	7	6	85.71
5	21/10/2023	7	6	85.71
6	06/11/2023	7	6	85.71
7	22/12/2023	7	5	71.43
8	31/01/2024	7	7	100
9	07/02/2024	7	5	71.43

C. COMMITTEE MEETINGS

Number of meetings held

11

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	29/05/2023	3	3	100
2	Audit Committee	10/08/2023	3	3	100
3	Audit Committee	21/10/2023	3	3	100
4	Audit Committee	06/11/2023	3	3	100
5	Audit Committee	31/01/2024	3	3	100
6	Audit Committee	07/02/2024	3	2	66.67
7	Nomination and Remuneration	29/05/2023	3	2	66.67
8	Nomination and Remuneration	26/06/2023	3	2	66.67
9	Nomination and Remuneration	21/10/2023	3	3	100
10	Nomination and Remuneration	07/02/2024	3	2	66.67

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	
								30/09/2024
								(Y/N/NA)

1	SURESH VEN	0	0	0	0	0	0	Yes
2	SRINIVAS MA	9	8	88.89	0	0	0	Yes
3	MAYAKESAV,	9	7	77.78	0	0	0	Yes
4	BIJU CHANDR	9	8	88.89	11	10	90.91	Yes
5	VEERAVALLI	9	8	88.89	11	11	100	Yes
6	PANCHI SAM	7	7	100	0	0	0	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

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Srinivas Mahankali	Whole time Dire	5,702,350	0	0	332,685	6,035,035
	Total		5,702,350	0	0	332,685	6,035,035

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	Roshini Selvakumar	Company Secre	1,240,000	0	0	0	1,240,000
2	Ramachandran S	Chief Financial C	682,000	0	0	0	682,000
	Total		1,922,000	0	0	0	1,922,000

Number of other directors whose remuneration details to be entered

5

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Biju Chandran	Independent Dir	0	0	0	107,500	107,500
2	Mayakesavan Vijayl	Independent Dir	0	0	0	40,000	40,000
3	Venkateshwaran Ba	Independent Dir	0	0	0	65,000	65,000
4	Veeravalli Varadhar	Independent Dir	0	0	0	80,000	80,000
5	Panchi Samuthiraka	Independent Dir	0	0	0	40,000	40,000
	Total		0	0	0	332,500	332,500

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

4

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
SecureKloud Tech	Securities and Exc	14/09/2022	Regulation 23(2), Re	2500000	On appeal, Hon'ble Securities
Gurumuthi Jayarar	Securities and Exc	14/09/2022	Regulation 16(1)(b)(1000000	On appeal, Hon'ble Securities
Padmini Ravichan	Securities and Exc	14/09/2022	Regulation 16(1)(b)(1000000	On appeal, Hon'ble Securities
G Sri Vignesh	Securities and Exc	14/09/2022	Regulation 6(2)(a) o	400000	On appeal, Hon'ble Securities

(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

Nithya Pashupathy

Whether associate or fellow

Associate Fellow

Certificate of practice number

22562

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

Digitally signed by
 MAHANKAL SRINIVAS
SRINIVAS
 Date: 2024.11.28
 18:37:42 +0530'

DIN of the director

To be digitally signed by

Digitally signed by
 VASUDEVAN JAYASHREE
VASUDEVAN
 JAYASHREE
 Date: 2024.11.28
 17:52:14 +0530'

- 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

Meetings.pdf
 List of Shareholders.pdf
 MGT-8 2024 final.pdf

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 **SECUREKLOUD TECHNOLOGIES LIMITED (CIN: L72300TN1993PLC101852)** 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, 2024**. 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 there in within the time prescribed therefor;
 3. Filing of forms and returns with the Registrar of Companies or other authorities within the prescribed time;
 4. The Company during the year under review had duly complied with calling/ convening/ holding meetings of Board of Directors and its committees 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 have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed.



SPNP & ASSOCIATES
Practising Company Secretaries

No.10/28, II Floor, 3rd Cross Street, R.K. Nagar, Raja Annamalaipuram, Chennai - 600 028.
spnpassociates@gmail.com # Phone: 044 4215 3510, 4320 1250, Mobile : 95660 33011



5. The Company during the Financial Year under review, the Company had not opted to close its Registers of Members and Share Transfer Books.
6. During the year under review, the company has not given any advances/Loans to any of its Directors and/or person or firm or Companies referred to in Section 185 of the Act.
7. As per the information and explanation given by the Management, the Company has entered into inter-se transactions relating to contracts / arrangements with related parties which are in compliance with the provisions of Section 188(1) of the Companies Act, 2013.

However, during the period under review, the Company has entered into few related Party transactions including material modifications without the prior approval of Audit Committee as required under Regulation 23 of SEBI (LODR) Regulations, 2015.
8. During the period under review, the Company has not made any issue or allotment or buy back of securities/redemption of preference shares or debentures/alteration or reduction of share capital/conversion of shares/ securities.
9. During the Financial Year under review, the Company has not kept in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares during the Financial Year under review.
10. The Company during the Financial Year under review has not declared and paid dividend and there is unpaid/unclaimed dividend for the year 2017 amounting to Rs.70,848/- and there are no requirements to be transferred to the Investor Education and Protection Fund as per Section 125 of the Act. The company has been filing the Form IEPF-2 for the Non-payment of dividend.





11. As per the information and explanation given by the Management, the Company during the Financial Year under review had duly complied with the requirement relating to 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), (4) and (5) thereof;
12. The Board of Directors of the Company is well constituted. During the year under review, there were appointment/re-appointment, change in designation and resignation of directors. The appointment/ resignation of Key Managerial Personnel was duly made in compliance with the provisions of the Companies Act, 2013. Further, relevant disclosures and declaration from the existing Directors have been obtained by the Company.
13. During the Financial Year under review, there was no appointment/re-appointment or resignation of Statutory Auditors as the existing auditors of the Company/s. K. Gopal & Co (FRN: 000956S) who were appointed for a period of 5 years at the Annual General Meeting held on 30th September, 2020 to hold office till the conclusion of the 40th Annual General Meeting to be held in 2025.
14. As per the information and explanation given by the management the company had no transaction, which necessitated the company to seek any approvals that are required to be taken from the Central Government, Tribunal, Regional Director or such other authorities under the provisions of the act.

During the period under review, the Company had appealed before the Hon'ble Securities Appellate Tribunal against the AO order (ORDER/GG/BS/2022-23/19373-19376) dated September 14, 2022 wherein a penalty of INR 25,00,000 was levied against the Company for violations of various provisions of the SEBI (I.ODR) Regulations, 2015. The Hon'ble Securities Appellate Tribunal on June 12, 2023 passed an Order (Appeal 918 of 2022) reducing the penalty to INR 10,00,000.





15. According to information and explanation given by Management, the Company had not accepted/renewed/repaid any deposits during the period under review.
16. During the period under review, the company has not borrowed any amount from Directors/Shareholders/bank/Public Financial Institutions.

As on 31st March 2024, the Company has an outstanding unsecured loan from Promoter and necessary declaration has been obtained from the Director that the loan has not been given out of funds borrowed or deposits accepted from others.

17. During the Financial Year under review, the Company has not given any loans to any person/body corporate. However, the guarantee given and the investments made by the Company are in accordance with section 185 & 186 of the companies Act, 2013.
18. During the Financial Year under review, the Company has not altered the Memorandum of Association and the Articles of Association of the Company.

For SPNP & Associates

Nithya Pasupathy
Certificate of Practice No: 22562
Membership No.:10601
Peer Review No: 1913/2022
UDIN: F010601F002956808

Date: 28.11.2024
Place: Chennai