

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
- (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
Private 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

(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

(d) If yes, provide the Service Request Number (SRN) of the application form filed for extension

(e) Extended due date of AGM after grant of extension

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	G	Trade	G2	Retail Trading	69.89

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

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

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	Sky Luck Enterprisers Limited		Holding	99.9

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

(i) *SHARE CAPITAL

(a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	100,000	100,000	100,000	100,000
Total amount of equity shares (in Rupees)	1,000,000	1,000,000	1,000,000	1,000,000

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
EQUITY				
Number of equity shares	100,000	100,000	100,000	100,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	1,000,000	1,000,000	1,000,000	1,000,000

(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	100,000	0	100000	1,000,000	1,000,000	
Increase during the year	0	0	0	0	0	0
i. Public Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0

v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0
viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify <input type="text"/>						
Decrease during the year	0	0	0	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 <input type="text"/>						
At the end of the year	100,000	0	100000	1,000,000	1,000,000	
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 <input type="text"/>						
Decrease during the year	0	0	0	0	0	0
i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify <input type="text"/>						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company

(ii) Details of stock split/consolidation during the year (for each class of shares)

0

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

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

Nil

[Details being provided in a CD/Digital Media]

Yes No Not Applicable

Separate sheet attached for details of transfers

Yes No

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

Date of the previous annual general meeting		<input type="text"/>	
Date of registration of transfer (Date Month Year)		<input type="text"/>	
Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
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

Date of registration of transfer (Date Month Year)

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

Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Ledger Folio of Transferee

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					

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

(i) Turnover

10,779,779,664

(ii) Net worth of the Company

211,087,000

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	100	0.1	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)	99,900	99.9	0	
10.	Others	0	0	0	
	Total	100,000	100	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	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)	0	0	0	
10.	Others	0	0	0	

	Total	0	0	0	0
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Total number of shareholders (other than promoters)

0

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

2

**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)	0	0
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	1	0	1	0	0.1	0
B. Non-Promoter	1	0	1	0	0	0
(i) Non-Independent	1	0	1	0	0	0
(ii) Independent	0	0	0	0	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	0	2	0	0.1	0

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

2

(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)
MADHAV SHETH	01634318	Director	100	
DU HONGZHAO	09324068	Director	0	

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

3

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)
GUO CHAO	08492343	Director	24/01/2022	CESSATION
DU HONGZHAO	09324068	Additional director	17/09/2021	APPOINTED AS ADDITIONAL DIRE
DU HONGZHAO	09324068	Director	30/11/2021	REGULARISATION

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 MEETI	30/11/2021	2	2	100

B. BOARD MEETINGS

*Number of meetings held

5

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	28/07/2021	2	2	100
2	22/09/2021	3	2	66.67
3	05/11/2021	3	2	66.67
4	25/01/2022	2	2	100
5	29/03/2022	2	2	100

C. COMMITTEE MEETINGS

Number of meetings held

3

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	Corporate Soc	19/04/2021	2	2	100
2	Corporate Soc	28/10/2021	3	2	66.67
3	Corporate Soc	07/03/2022	2	2	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	28/10/2022
								(Y/N/NA)
1	MADHAV SHE	5	5	100	3	3	100	Yes
2	DU HONGZH/	4	4	100	2	2	100	No

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

3

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/Sweat equity	Others	Total Amount
1	MADHAV PRAKASI	Director	101,597,260	0	0	0	101,597,260
2	Du Hongzhao	Director	1,348,316	0	0	0	1,348,316
3	Guo Chao	Director	804,660	0	0	0	804,660
	Total		103,750,236	0	0	0	103,750,236

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

0

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

Number of other directors whose remuneration details to be entered

0

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

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

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

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

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

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

(B) DETAILS OF COMPOUNDING OF OFFENCES Nil

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

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

Yes No

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

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

Name

PRIYAM GUPTA

Whether associate or fellow

Associate Fellow

Certificate of practice number

18567

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.
- (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 the 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 a 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.

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

MADHAV SHETH

DIN of the director

To be digitally signed by

priyam gupta

- 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

List of Shareholders Latest.pdf
Approval Letter Extension.pdf
MGT-8 Realme 2022.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



सत्यमेव जयते

**GOVERNMENT OF INDIA
MINISTRY OF CORPORATE AFFAIRS**

Office of the Registrar of Companies
4th Floor, IFCI Tower 61, New Delhi, Delhi, India, 110019

DATED : 30-09-2022

IN THE MATTER OF M/S REALME MOBILE TELECOMMUNICATIONS (INDIA) CIN
U32301HR2018PTC076011
AND

IN THE MATTER OF EXTENSION UNDER SECTION 96(1) OF THE COMPANIES ACT, 2013

The Company has closed its accounting year on 31-03-2022 and the Annual general meeting of the company is due to be held on 30-09-2022 as per requirements of section 96 of the Companies Act, 2013. The company has made an application vide SRN F26701094 on 28-09-2022 requesting for an extension of time for the purpose of holding AGM on the following grounds

Extension of AGM is allowed for one month.

Keeping in view, the aforesaid circumstances due to which company cannot hold its Annual General Meeting on time, extension 1 month 0 days is considered.

ORDER

Under the power vested in the undersigned by virtue of section 96(1) read with second proviso attached thereto extension of 1 month 0 days is hereby granted. However, the company is hereby advised to be careful in future in compliance of the provisions of the Companies Act, 2013.



Yours faithfully,

MANGAL RAM MEENA

Registrar of Companies

RoC - Delhi

Mailing Address as per record available in Registrar of Companies office:

REALME MOBILE TELECOMMUNICATIONS (INDIA)
3RD FLOOR, TOWER B,, BUILDING NUMBER 8, DLF CYBER CITY,
GURUGRAM, Gurgaon, Haryana, India, 122002



Note: This letter is to be generated only when the application is approved by RoC office

REALME MOBILE TELECOMMUNICATIONS (INDIA) PRIVATE LIMITED

Current List of Shareholders as on 31.03.2022

S. No.	Name of Shareholder	Type of Shares	Shares in numbers	% of shareholding	Amount of shares (INR)
1.	Mr. Madhav Prakash Sheth	Equity	100@Rs. 10/- each	0.10%	1,000.00
2.	Sky Luck Enterprises Limited	Equity	99,900@Rs. 10/- each	99.90%	9,99,000.00
Total			1,00,000@Rs. 10/- each	100%	10,00,000.00

For and on behalf of Board of Directors
FOR REALME MOBILE TELECOMMUNICATIONS (INDIA) PRIVATE LIMITED

For Realme Mobile Telecommunications (India) Pvt. Ltd.



Director / Directors

(MADHAV SHETH)

Director

DIN: 01634318

Address: Flat No.81, Tower-B

Golf Course Road, DLF Phase 5, The Pinnacle,
 Galleria, DLF-IV, Gurgaon, Haryana, India-122009.

Date: 24.11.2022

Place: Gurugram



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

We have examined the registers, records and books and papers of **REALME MOBILE TELECOMMUNICATIONS (INDIA) PRIVATE LIMITED** having CIN: **U32301HR2018PTC076011** (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 **31st March, 2022**. In our opinion and to the best of my information and according to the examination carried out by us and explanation furnished to us by the Company, its officers and agents, we hereby certify that:

A. The extract of annual return and related information thereof provided by the company and its officers states the facts as at the close of the aforesaid financial year correctly and adequately.

"Since Annual Return need not be prepared in physical format because there is no requirement to attach Annual return with the e-form. No MGT-7 and e form no MGT-7 (for filing of Annual Return) is an e-form' and there can be a delay in filing form and MCA can make changes in the intervening period, therefore, certification of MGT-8 may be read in this light"

B. During the aforesaid financial year, the Company has complied with the provisions of the Act & Rules made there under in respect of in respect of the following as explained hereunder:

- 1) Its status under the Act i.e. the Company is a Private Company Having Share Capital;
- 2) The Company has kept and maintained all Statutory Registers as stated in **Annexure 'A'** to this Certificate as per the provisions of the Act and the rules made there under and all the entries therein have been duly recorded within the time Prescribed;



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- 3) The Company has filed the Forms and returns as stated in **Annexure B** to this Certificate, with the Registrar of Companies, Regional Director, central Government, Tribunal, Court or other authorities under the act and the rules made there under within the prescribed time under the law;
- 4) The Board of Directors duly met 5 (Five) Times, CSR committee has met 3 (Three) times as stated in the Directors Report of the Company and there is 1 (One) meeting of the members of the Company i'e' Annual General Meeting held on 30/11/2021, 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) The Company was not required to close its Registers of members/security holders;
- 6) The Company has not given any advance/loan to its directors and/or persons or firms or companies under the purview of section 185 of the Act;
- 7) The Company has not entered into contracts/arrangements with the related parties, and complied with the provisions of section 188 of the Act';
- 8) There was no instance of 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, during the period under review;
- 9) There was no instance of keeping in abeyance the rights to dividend, right shares and bonus shares pending registration of transfer of shares, during the period under review;
- 10) The company has not declared any dividend during the period under review hence there was no instance of unpaid/ unclaimed dividend/other amounts, if any as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;





- 11) The company has signed the 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, Key Managerial Persons of the Company is duly constituted and the remuneration paid to the managerial personnel's is in accordance with the provisions of the Act;
- 13) The Company has complied with the provisions of the Section 139 of the Act in relation to the Appointment of Auditors;
- 14) There was no requirement to take approval from the Central Government, Tribunal, Regional Director, Court or such other authorities under the provisions of the Act;
- 15) There was no instance of Acceptance/ renewal/repayment of deposits;
- 16) The Company has not taken any loan from its directors and members' Further the Company has taken loan from public financial institutions' banks and others and has duly creation/ modification/ satisfaction of charges in that respect;
- 17) The Company has not made any Loans or investments or given guarantees or provided securities to other body corporate or persons falling under the provisions of section 186 of the Act;
- 18) The Company has not altered any of the provisions of the Memorandum of Association and the Articles of Association of the Company during the period under review;

Date: 16.12.2022
Place: Meerut

For Priyam & Associates



Priyam

Priyam Gupta
Company Secretary

Memb. No.: 51177

C.O.P. No.: 18567

UDIN: A051177D002734957



This Certificate of even date is to be read along this letter:-

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on such examination.
2. I have followed the audit practice and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in the secretarial records, I believe that the process and practices, I followed provide a reasonable basis of my opinion.
3. I have not verified the correctness and appropriateness of the financial records and books of accounts of the Company.
4. Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The Compliance of the provisions of the corporate and other applicable laws, rules and regulations, standards is the responsibility of the Management; my examination was limited to the verification of the procedures on test basis.
6. The form MGT-8 is neither an assurance as to the future viability of the company nor the efficacy or effectiveness with which the management has conducted the affairs of the company.

For Priyam & Associates



Priyam

**Priyam Gupta
Company Secretary**

Memb. No.: 51177

C.O.P. No.: 18567

UDIN: A051177D002734957

Date: 16.12.2022

Place: Meerut

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ANNEXURE-A

S. No.	Register	U/s
1	Register of members	Pursuant to Section 88 (1)(a) of the Companies Act, 2013 read with rule 3(1) of the Companies (Management and Administration) Rules 2014.
2	Minutes book for the meeting of Directors	Pursuant to Section 118 of the Companies Act, 2013.
3	Minutes book for the meeting of Shareholders	Pursuant to Section 118 of the Companies Act, 2013.
4	Register of Directors and KMP with their shareholding	Pursuant to Section 170 of the Companies Act, 2013 read with Rule 17 of the Companies (Appointment and qualification of Directors) Rules 2014.
5	Register of contracts with related parties	Pursuant to Section 189(1) of the Companies Act, 2013 read with Rule 16(1) of the Companies (Meeting of board and its power) Rules 2014.
6	Register of Loans/Guarantee/ Security and Acquisition by company	Pursuant to Section 189 of the Companies Act, 2013 read with Rule 16 of the Companies (Meeting of board and its power) Rules 2014.
7	Register of charges	Pursuant to Section 85 of the Companies Act, 2013 read with sub-rule (1) of rule 10 of the Companies (Registration of charges) rule 2014.

For Priyam & Associates



Priyam Gupta

Company Secretary

Memb. No.: 51177

C.O.P. No.: 18567

UDIN: A051177D002734957

Date: 16.12.2022

Place: Meerut

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ANNEXURE-B

Forms And Returns Filed by The Company with Registrar of Companies, Regional Director, Central Government or Any other Authority During the Financial Year Ended 31/03/2022

S. No.	Form / Return No.	Filed under section / rule of companies act 2013	Purpose	Name of the Authority	Date of filing	Whether Filed Within Prescribed Time Yes/No	If Delayed Filing Whether Requisite Late Fees Paid Yes/No
1	Form CHG-1	77	Modification Of Charge	ROC	16/08/2021	YES	NA
2	Form CHG-1	77	Modification Of Charge	ROC	28/09/2021	YES	NA
3	AOC-4 XBRL	137	Financials for 2020-21	ROC	24/12/2021	YES	NA
4	MGT-7	92	Annual Return for 2021-22	ROC	19/01/2021	YES	NA
5	CSR-2	Sub-Rule (1B)	Report on Corporate Social Responsibility (CSR)	ROC	29/03/2022	YES	NA
6	MSME	405	Half Yearly MSME Reporting	ROC	27/04/2021	YES	NA
7	MSME	405	Half Yearly MSME Reporting	ROC	28/10/2021	YES	NA





8	DIR-12	168 & 170 (2)	Particulars of Resignation of Directors	ROC	28/01/2022	YES	NA
9	DIR-12	168 & 170 (2)	Particulars of appointment of Directors	ROC	21/09/2021	YES	NA
10	DIR-12	168 & 170 (2)	Regularization of Director	ROC	24/12/2021	YES	NA

For Priyam & Associates



Priyam

Priyam Gupta

Company Secretary

Mem. No.: 51177

C.O.P. No.: 18567

UDIN: A051177D002734957

Date: 16.12.2022

Place: Meerut