

**FORM NO. MGT 9****EXTRACT OF ANNUAL RETURN**

As on financial year ended on 31.03.2020

**ANNEXURE-B**

Pursuant to Section 92(3) of the Companies Act, 2013 and rule 12(1) of the Company (Management &amp; Administration) Rules, 2014.

**I. REGISTRATION & OTHER DETAILS:**

1	CIN	L51909GJ2007PLC050974
2	Registration Date	28-May-2007
3	Name of the Company	SUN RETAIL LIMITED
4	Category/Sub-category of the Company	Public Limited Company Non-govt company
5	Address of the Registered office & contact details	213/214, Phase-II GIDC, Naroda, Ahmedabad-382330, Gujarat India
6	Whether listed company	Listed Company
7	Name, Address & contact details of the Registrar & Transfer Agent, if any.	BIGSHARE SERVICES PRIVATE LIMITED A-802, Samudra Complex, off C G Road, Navrangpura, Near Girish Cold Drinks, Ahmedabad 380009, Gujarat, India Tel No: 079-40024135

**II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**

(All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S No	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Sale of edible oils	46305	0.89%
2	Other education and training services n.e.c.	99929	99.11%

**III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES**

SN	Name and address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of shares held	Applicable Section
1	TJR AGROCOM PRIVATE LIMITED	U27310GJ2002PTC041629	Holding	54.64%	2(46)

**IV. SHARE HOLDING PATTERN**

(Equity share capital breakup as percentage of total equity)

**(i) Category-wise Share Holding**

Sr No	Category of Shareholder	No. of Shares held at the beginning of the year: 30/03/2019			No. of Shares held at the end of the year :31/03/2020			Total %	% Change
		Demat	Physical	Total Shares	Demat	Physical	Total Shares		
(A) Shareholding of Promoter and Promoter Group2									
1	Indian								

a	INDIVIDUAL / HUF	0	0	0	0.00	0	0	0	0.00	0.00
B	Central / State government(s)	0	0	0	0.00	0	0	0	0.00	0.00
c	BODIES CORPORATE	0	0	0	0.00	0	0	0	0.00	0.00
d	FINANCIAL INSTITUTIONS / BANKS	0	0	0	0.00	0	0	0	0.00	0.00
e	ANY OTHERS (Specify)	5298690	0	5298690	54.64	5298690	0	5298690	54.64	0.00
1	GROUP COMPANIES	5298690	0	5298690	54.64	5298690	0	5298690	54.64	0.00
2	TRUSTS	0	0	0	0.00	0	0	0	0.00	0.00
3	DIRECTORS RELATIVES	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	<b>5298690</b>	<b>0</b>	<b>5298690</b>	<b>54.64</b>	<b>5298690</b>	<b>0</b>	<b>5298690</b>	<b>54.64</b>	<b>0.00</b>
<b>(A) Shareholding of Promoter and Promoter Group2</b>										
<b>2</b>	<b>Foreign</b>									
a	BODIES CORPORATE	0	0	0	0.00	0	0	0	0.00	0.00
b	INDIVIDUAL	0	0	0	0.00	0	0	0	0.00	0.00
c	INSTITUTIONS	0	0	0	0.00	0	0	0	0.00	0.00
d	QUALIFIED FOREIGN INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
e	ANY OTHERS (Specify)	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>
	<b>Total Public Shareholding</b>	<b>5298690</b>	<b>0</b>	<b>5298690</b>	<b>99.98</b>	<b>5298690</b>	<b>0</b>	<b>5298690</b>	<b>54.64</b>	<b>0.00</b>
<b>(B) Public shareholding</b>										
<b>3</b>	<b>Institutions</b>									
a	Central / State government(s)	0	0	0	0.00	0	0	0	0.00	0.00
b	FINANCIAL INSTITUTIONS / BANKS	0	0	0	0.00	0	0	0	0.00	0.00
c	MUTUAL FUNDS / UTI	0	0	0	0.00	0	0	0	0.00	0.00
d	VENTURE CAPITAL FUNDS	0	0	0	0.00	0	0	0	0.00	0.00
e	INSURANCE COMPANIES	0	0	0	0.00	0	0	0	0.00	0.00
f	FII'S	0	0	0	0.00	0	0	0	0.00	0.00
g	FOREIGN VENTURE CAPITAL INVESTORS	0	0	0	0.00	0	0	0	0.00	0.00
h	QUALIFIED FOREIGN INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
i	ANY OTHERS (Specify)	0	0	0	0.00	0	0	0	0.00	0.00

j	FOREIGN PORTFOLIO INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
k	ALTERNATE INVESTMENT FUND	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>
<b>(B) Public shareholding</b>										
<b>4</b>	<b>Non-institutions</b>									
a	BODIES CORPORATE	1308000	0	1308000	13.49	1236000	0	1236000	12.74	(0.74)
b	INDIVIDUAL									
1	(CAPITAL UPTO TO Rs. 1 Lakh)	151200	110	151310	1.56	196200	110	196310	2.02	0.46
c										
1	(CAPITAL GREATER THAN Rs. 1 Lakh)	2166000	0	2166000	22.33	1884000	0	1884000	19.43	(2.91)
d	ANY OTHERS (Specify)	0	0	0	0.00	0	0	0	0.00	0.00
1	HUF	222000	0	222000	2.29	633000	0	633000	6.53	4.24
2	TRUSTS	0	0	0	0.00	0	0	0	0.00	0.00
3	CLEARING MEMBER	546000	0	546000	5.63	444000	0	444000	4.58	(1.05)
4	NON RESIDENT INDIANS (NRI)	6000	0	6000	0.06	6000	0	6000	0.06	0.00
5	DIRECTORS RELATIVES	0	0	0	0.00	0	0	0	0.00	0.00
6	EMPLOYEE	0	0	0	0.00	0	0	0	0.00	0.00
7	OVERSEAS BODIES CORPORATES	0	0	0	0.00	0	0	0	0.00	0.00
8	UNCLAIMED SUSPENSE ACCOUNT	0	0	0	0.00	0	0	0	0.00	0.00
9	IEPF	0	0	0	0.00	0	0	0	0.00	0.00
e	QUALIFIED FOREIGN INVESTOR	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	<b>4399200</b>	<b>110</b>	<b>4399310</b>	<b>45.36</b>	<b>4399200</b>	<b>110</b>	<b>4399310</b>	<b>45.36</b>	<b>(0.00)</b>
	<b>Total Public Shareholding</b>	<b>4399200</b>	<b>110</b>	<b>4399310</b>	<b>45.36</b>	<b>4399200</b>	<b>110</b>	<b>4399310</b>	<b>45.36</b>	<b>(0.00)</b>
<b>(C) Shares held by Custodians and against which Depository Receipts have been issued</b>										
5										
f	SHARES HELD BY CUSTODIANS	0	0	0	0.00	0	0	0	0.00	0.00
9	Promoter and Promoter Group	0	0	0	0.00	0	0	0	0.00	0.00
10	Public	0	0	0	0.00	0	0	0	0.00	0.00
	<b>SUB TOTAL :</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>
	<b>Total Public Shareholding</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>	<b>0.00</b>
	<b>GRAND TOTAL</b>	<b>9697890</b>	<b>110</b>	<b>9698000</b>	<b>100.00</b>	<b>9697890</b>	<b>110</b>	<b>9698000</b>	<b>100.00</b>	<b>0.00</b>

**(ii) Shareholding of Promoter**

S N	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged/encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	<b>TJR AGROCOM PRIVATE LIMITED</b>	5298690	54.64%	NIL	5298690	54.64%	NIL	0.00

**(iii) Change in Promoters' Shareholding (please specify, if there is no change)**

S N	Particulars	Date	Reason	Shareholding		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
NO CHANGE							
1	<b>TJR AGROCOM PRIVATE LIMITED</b>						
	At the beginning of the year			<b>5298690</b>	<b>54.64%</b>	<b>5298690</b>	<b>54.64%</b>
	Changes during the year			0	0.00%	0	0.00%
				0	0.00%	0	0.00%
					0.00%		0.00%
	At the end of the year			5298690	54.64%	5298690	54.64%

**(iv) Shareholding Pattern of top ten Shareholders***(Other than Directors, Promoters and Holders of GDRs and ADRs):*

SR NO	Name	Shareholding		Date	Increase /Decrease in Shareholding	Reason	Cumulative Shareholding during the year	
		No. of Shares At the Beginning (30/03/2019)/ end of the year (31/03/2020)	% total Shares of the Company				No of Shares	% total Shares of the Company
1	ASE CAPITAL MARKETS LTD.	954000	9.84	30-Mar-2019	0		954000	9.84
			8.79	05-Apr-2019	-102000	Sell	852000	8.79
			8.72	12-Apr-2019	-6000	Sell	846000	8.72
			8.66	10-May-2019	-6000	Sell	840000	8.66
			9.03	31-May-2019	36000	Buy	876000	9.03

			10.27	07-Jun-2019	120000	Buy	996000	10.27
			5.66	28-Jun-2019	-447000	Sell	549000	5.66
			5.17	05-Jul-2019	-48000	Sell	501000	5.17
			3.43	12-Jul-2019	-168000	Sell	333000	3.43
			3.50	26-Jul-2019	6000	Buy	339000	3.50
			3.62	02-Aug-2019	12000	Buy	351000	3.62
			3.59	09-Aug-2019	-3000	Sell	348000	3.59
			3.43	16-Aug-2019	-15000	Sell	333000	3.43
			5.38	30-Aug-2019	189000	Buy	522000	5.38
			0.00	31-Aug-2019	-522000	Sell	0	0.00
			0.15	06-Sep-2019	15000	Buy	15000	0.15
			0.62	13-Sep-2019	45000	Buy	60000	0.62
			0.25	20-Sep-2019	-36000	Sell	24000	0.25
			0.15	27-Sep-2019	-9000	Sell	15000	0.15
			0.03	30-Sep-2019	-12000	Sell	3000	0.03
			0.31	04-Oct-2019	27000	Buy	30000	0.31
			0.09	11-Oct-2019	-21000	Sell	9000	0.09
			0.12	18-Oct-2019	3000	Buy	12000	0.12
			0.00	25-Oct-2019	-12000	Sell	0	0.00
			2.13	08-Nov-2019	207000	Buy	207000	2.13
			0.43	15-Nov-2019	-165000	Sell	42000	0.43
			0.00	22-Nov-2019	-42000	Sell	0	0.00
			1.36	29-Nov-2019	132000	Buy	132000	1.36
			2.35	06-Dec-2019	96000	Buy	228000	2.35
			0.25	13-Dec-2019	-204000	Sell	24000	0.25
			2.44	20-Dec-2019	213000	Buy	237000	2.44
			0.19	27-Dec-2019	-219000	Sell	18000	0.19
			0.00	31-Dec-2019	-18000	Sell	0	0.00
			0.06	24-Jan-2020	6000	Buy	6000	0.06
			0.15	31-Jan-2020	9000	Buy	15000	0.15
			0.00	07-Feb-2020	-15000	Sell	0	0.00
			0.03	06-Mar-2020	3000	Buy	3000	0.03
			0.00	13-Mar-2020	-3000	Sell	0	0.00
			0.00	31-Mar-2020	0		0	0.00
2	ARDENT VENTURES LLP	0	0.00	30-Mar-2019		Sell	0	0.00
			3.34	06-Sep-2019	324000	Buy	324000	3.34
			5.35	15-Nov-2019	195000	Buy	519000	5.35
			6.68	13-Dec-2019	129000	Buy	648000	6.68
		648000	6.68	31-Mar-2020	0		648000	6.68
3	NNM SECURITIES	366000	3.77	30-Mar-2019	0		366000	3.77
			3.84	05-Apr-2019	6000	Buy	372000	3.84
			3.96	12-Apr-2019	12000	Buy	384000	3.96
			4.02	03-May-2019	6000	Buy	390000	4.02
			4.21	10-May-2019	18000	Buy	408000	4.21
			4.24	17-May-2019	3000	Buy	411000	4.24
			4.30	24-May-2019	6000	Buy	417000	4.30
			4.36	31-May-2019	6000	Buy	423000	4.36
			4.42	07-Jun-2019	6000	Buy	429000	4.42
			4.39	14-Jun-2019	-3000	Sell	426000	4.39

			4.45	21-Jun-2019	6000	Buy	432000	4.45
			4.42	28-Jun-2019	-3000	Sell	429000	4.42
			4.36	12-Jul-2019	-6000	Sell	423000	4.36
			4.42	19-Jul-2019	6000	Buy	429000	4.42
			4.36	02-Aug-2019	-6000	Sell	423000	4.36
			4.39	23-Aug-2019	3000	Buy	426000	4.39
			4.33	30-Aug-2019	-6000	Sell	420000	4.33
			4.24	06-Sep-2019	-9000	Sell	411000	4.24
			4.18	13-Sep-2019	-6000	Sell	405000	4.18
			4.15	20-Sep-2019	-3000	Sell	402000	4.15
			4.24	27-Sep-2019	9000	Buy	411000	4.24
			4.27	30-Sep-2019	3000	Buy	414000	4.27
			4.30	11-Oct-2019	3000	Buy	417000	4.30
			4.24	18-Oct-2019	-6000	Sell	411000	4.24
			4.27	25-Oct-2019	3000	Buy	414000	4.27
			4.21	08-Nov-2019	-6000	Sell	408000	4.21
			4.24	15-Nov-2019	3000	Buy	411000	4.24
			4.27	22-Nov-2019	3000	Buy	414000	4.27
			4.30	29-Nov-2019	3000	Buy	417000	4.30
			4.33	13-Dec-2019	3000	Buy	420000	4.33
			4.36	20-Dec-2019	3000	Buy	423000	4.36
			4.27	27-Dec-2019	-9000	Sell	414000	4.27
			4.30	31-Dec-2019	3000	Buy	417000	4.30
			4.36	24-Jan-2020	6000	Buy	423000	4.36
			4.21	31-Jan-2020	-15000	Sell	408000	4.21
			4.33	07-Feb-2020	12000	Buy	420000	4.33
			4.39	14-Feb-2020	6000	Buy	426000	4.39
			4.42	06-Mar-2020	3000	Buy	429000	4.42
			4.45	13-Mar-2020	3000	Buy	432000	4.45
		432000	4.45	31-Mar-2020	0		432000	4.45
4	OSCAR INFRA PRAVATE LIMITED	0	0.00	30-Mar-2019		Sell	0	0.00
			4.08	06-Sep-2019	396000	Buy	396000	4.08
		396000	4.08	31-Mar-2020	0		396000	4.08
5	KHUSHBOO VANRAJ KAHOR	294000	3.03	30-Mar-2019	0		294000	3.03
			0.00	31-Aug-2019	-294000	Sell	0	0.00
			3.03	06-Sep-2019	294000	Buy	294000	3.03
			2.29	25-Oct-2019	-72000	Sell	222000	2.29
			1.92	01-Nov-2019	-36000	Sell	186000	1.92
			1.36	08-Nov-2019	-54000	Sell	132000	1.36
			1.02	06-Dec-2019	-33000	Sell	99000	1.02
		99000	1.02	31-Mar-2020	0		99000	1.02
6	SANJAY JAYKANT SHAH (HUF)	0	0.00	30-Mar-2019		Sell	0	0.00
			0.80	25-Oct-2019	78000	Buy	78000	0.80
			1.33	01-Nov-2019	51000	Buy	129000	1.33
			1.55	31-Jan-2020	21000	Buy	150000	1.55
			3.03	27-Mar-2020	144000	Buy	294000	3.03
		294000	3.03	31-Mar-2020	0		294000	3.03
7	HARSH S JHAVERI	270000	2.78	30-Mar-2019	0		270000	2.78

			2.29	12-Jul-2019	-48000	Sell	222000	2.29
			2.20	02-Aug-2019	-9000	Sell	213000	2.20
			1.89	30-Aug-2019	-30000	Sell	183000	1.89
			0.00	31-Aug-2019	-183000	Sell	0	0.00
			1.45	06-Sep-2019	141000	Buy	141000	1.45
			0.00	08-Nov-2019	-141000	Sell	0	0.00
			0.00	31-Mar-2020	0		0	0.00
8	HITESH H. ASHRA	270000	2.78	30-Mar-2019	0		270000	2.78
		270000	2.78	31-Mar-2020	0		270000	2.78
9	VICKY R JHAVERI	264000	2.72	30-Mar-2019	0		264000	2.72
			0.14	07-Jun-2019	-250000	Sell	14000	0.14
			2.72	14-Jun-2019	250000	Buy	264000	2.72
			2.88	28-Jun-2019	15000	Buy	279000	2.88
			2.97	02-Aug-2019	9000	Buy	288000	2.97
			2.63	30-Aug-2019	-33000	Sell	255000	2.63
			0.00	31-Aug-2019	-255000	Sell	0	0.00
			2.10	06-Sep-2019	204000	Buy	204000	2.10
			2.13	11-Oct-2019	3000	Buy	207000	2.13
			1.64	08-Nov-2019	-48000	Sell	159000	1.64
			1.33	22-Nov-2019	-30000	Sell	129000	1.33
			0.00	29-Nov-2019	-129000	Sell	0	0.00
			0.00	31-Mar-2020	0		0	0.00
10	JITENDRAKUMAR GHEVARCHAND JAIN	228000	2.35	30-Mar-2019	0		228000	2.35
			2.23	12-Apr-2019	-12000	Sell	216000	2.23
			2.13	03-May-2019	-9000	Sell	207000	2.13
			2.07	17-May-2019	-6000	Sell	201000	2.07
			2.04	21-Jun-2019	-3000	Sell	198000	2.04
			2.01	28-Jun-2019	-3000	Sell	195000	2.01
			1.98	05-Jul-2019	-3000	Sell	192000	1.98
			1.58	12-Jul-2019	-39000	Sell	153000	1.58
			1.45	26-Jul-2019	-12000	Sell	141000	1.45
			1.36	30-Aug-2019	-9000	Sell	132000	1.36
			0.00	31-Aug-2019	-132000	Sell	0	0.00
			1.36	06-Sep-2019	132000	Buy	132000	1.36
			0.34	13-Sep-2019	-99000	Sell	33000	0.34
			0.25	20-Sep-2019	-9000	Sell	24000	0.25
			0.15	27-Sep-2019	-9000	Sell	15000	0.15
		15000	0.15	31-Mar-2020	0		15000	0.15

**(v) Shareholding of Directors and Key Managerial Personnel:**

SN	Shareholding of each Directors and each Key Managerial Personnel	Date	Reason	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
				No. of shares	% of total shares	No. of shares	% of total shares
1	NIL						
	At the beginning of the year						

Changes during the year				
At the end of the year				

#### V. INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(Amt. Rs.)

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	NIL	27,376,400.00	NIL	27,376,400.00
ii) Interest due but not paid	-	-		-
iii) Interest accrued but not due	-	-		-
<b>Total (i+ii+iii)</b>	<b>NIL</b>	<b>27,376,400.00</b>	<b>NIL</b>	<b>27,376,400.00</b>
<b>Change in Indebtedness during the financial year</b>				
* Addition	-	2,290,500.00		2,290,500.00
* Reduction	-	10,420,600.00		10,420,600.00
<b>Net Change</b>	<b>NIL</b>	<b>(8,130,100.00)</b>	<b>NIL</b>	<b>(8,130,100.00)</b>
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	-	19,246,300.00	-	19,246,300.00
ii) Interest due but not paid	-			-
iii) Interest accrued but not due	-			-
<b>Total (i+ii+iii)</b>	<b>NIL</b>	<b>19,246,300.00</b>	<b>NIL</b>	<b>19,246,300.00</b>

#### VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
		Name	(Rs)
		Designation	
		<b>DHARAMJIT MORI</b>	<b>NIL</b>
		<b>Whole Time Director &amp; CFO</b>	
1	Gross salary		
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	50,000.00	50,000.00
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961		-
2	Stock Option	NIL	NIL
			-



3	Sweat Equity	NIL	NIL	-
4	Commission	NIL	NIL	-
	- as % of profit			-
	- others, specify			-
5	Others, please specify	NIL	NIL	-
Total (A)		<b>50,000.00</b>	-	<b>50,000.00</b>
Ceiling as per the Act*		84,00,000.00		84,00,000.00

\* Pursuant to Section II-A Part II Schedule V to the Companies Act, 2013.

#### B. Remuneration to other Directors

SN.	Particulars of Remuneration	Name of Directors			Total Amount
					(Rs)
1	Independent Directors	<b>Tusharbhai Dineshbhai Donda</b>	<b>Janak Prakashbhai Patel</b>	<b>Jalpaben Dilipbhai Dholakiya</b>	
	Fee for attending board/committee meetings	50,000.00	30,000.00	10,000.00	90,000.00
	Commission	-	-	-	-
	Others, please specify	-	-	-	-
	Total (1)	<b>50,000.00</b>	<b>30,000.00</b>	<b>10,000.00</b>	<b>90,000.00</b>
2	Other Non-Executive Directors	<b>Vikram Ishvarbhai Desai</b>			-
	Fee for attending board/committee meetings	0			0
	Commission				-
	Others, please specify				-
	Total (2)	<b>0</b>	-	-	<b>0</b>
Total (B)=(1+2)		-	-	-	<b>90,000.00</b>
Total Managerial Remuneration		-	-	-	-
Overall Ceiling as per the Act					

#### C. Remuneration to Key Managerial Personnel other than MD/Manager/WTD

SN.	Particulars of Remuneration	Name of Key Managerial Personnel			Total Amount
		Name			(Rs)
		Designation	CEO	CS	
1	Gross salary	NA	NA	NA	
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961				

	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-	-	-
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961				-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-		-
4	Commission				-
	- as % of profit				-
	- others, specify				-
5	Others, please specify	-	-		-
	Total	-	-	-	-

**VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:**

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
<b>A. COMPANY</b>					
Penalty		NIL	NIL	NIL	NIL
Punishment					
Compounding					
<b>B. DIRECTORS</b>					
Penalty		NIL	NIL	NIL	NIL
Punishment					
Compounding					
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty		NIL	NIL	NIL	NIL
Punishment					
Compounding					

FOR AND ON BEHALF OF THE BOARD OF DIRECTORS

Date: December 02, 2020

Place: Ahmedabad

Sd/-  
DHARAMJIT MORI  
WHOLE TIME DIRECTOR & CFO  
DIN: 08038027

Sd/-  
VIKRAM DESAI  
DIRECTOR  
DIN: 08031739