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)

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (CIN) of the company Pre-fill L51102CT1995PLC009772 Global Location Number (GLN) of the company * Permanent Account Number (PAN) of the company AADCS2008J (ii) (a) Name of the company SARTHAK METALS LIMITED (b) Registered office address B.B.C COLONY KHURSPAR G.E.ROAD BHILA C.G. Chattisgarh 490011 +(c) *e-mail ID of the company info@sarthakmetals.com (d) *Telephone number with STD code 07883290584 (e) Website www.sarthakmetals.com Date of Incorporation (iii) 28/07/1995 (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 (\bullet) 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 |
| | | |

| | (b) CIN of the Registrar and Trar | - | | U99999MH | H1994PTC076534 | Pre-fill |
|--------|---|-------------------|--------------|----------|----------------|-------------|
| | Name of the Registrar and Tran | sfer Agent | | | | |
| | BIGSHARE SERVICES PRIVATE LIMI | TED | | | | |
| | Registered office address of the | Registrar and Tra | nsfer Agents | | | |
| | E-3 ANSA INDUSTRIAL ESTATESAK SAKINAKA | (I VIHAR ROAD | | | | |
| (vii) | Financial year From date $01/04$ | 1/2020 | (DD/MM/YYYY) | To date | 31/03/2021 | DD/MM/YYYY) |
| (viii) | *Whether Annual general meetir | ng (AGM) held | ○ Ye | es 💿 | No | |
| | (a) If yes, date of AGM | | | | | |
| | (b) Due date of AGM | 30/09/2021 | | | | |
| | (c) Whether any extension for A | GM granted | 0 | Yes | No | |
| | (f) Specify the reasons for not he | olding the same | | | | |
| | AGM will be held on September 1 | 4, 2021 | | | | |

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*Number of business activities 2

| | Main Activity group code | | Business Activity Code | | % of turnover of the company |
|---|--------------------------------|--|------------------------------|--|------------------------------------|
| 1 | С | Manufacturing | C7 | Metal and metal products | 98.73 |
| 2 | D | Electricity, gas, steam and air condition supply | D2 | Manufacture of gas, distribution of gaseous fuels | 1.27 |

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

*No. of Companies for which information is to be given 0

Pre-fill All

| S.No | Name of the company | CIN / FCRN | Holding/ Subsidiary/Associate/ Joint Venture | % of shares held |
|------|---------------------|------------|---|------------------|
| 1 | | | | |

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 | 15,000,000 | 13,689,750 | 13,689,750 | 13,689,750 |
| Total amount of equity shares (in Rupees) | 150,000,000 | 136,897,500 | 136,897,500 | 136,897,500 |

Number of classes

| Class of Shares Equity Shares | Authorised capital | Issued capital | Subscribed capital | Paid up capital |
|---|-----------------------|-------------------|-----------------------|-----------------|
| Number of equity shares | 15,000,000 | 13,689,750 | 13,689,750 | 13,689,750 |
| Nominal value per share (in rupees) | 10 | 10 | 10 | 10 |
| Total amount of equity shares (in rupees) | 150,000,000 | 136,897,500 | 136,897,500 | 136,897,500 |

1

(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 | lssued 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 |
|---|------------------|------------|----------|----------------------------|----------------------------|------------------|
| Equity shares | Physical | DEMAT | Total | | | |
| At the beginning of the year | 0 | 13,689,750 | 13689750 | 136,897,50(# | | |
| Increase during the year | 0 | 0 | 0 | 0 | 0 | 0 |
| i. Pubic 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 | | | | | | |
| 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 | | | | | | |
| At the end of the year | 0 | 13,689,750 | 13689750 | 136,897,50(| 136,897,50 | |
| 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 | 1 | | | | | |
|---------------------------------|---|---|---|---|---|---|
| | | | | | | |
| 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 | | | | | | |
| 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 o | f shares | (i) | (ii) | (iii) |
|----------------|----------------------|-----|------|-------|
| Before split / | Number of shares | | | |
| Consolidation | Face value per share | | | |
| After split / | Number of shares | | | |
| Consolidation | Face value per share | | | |

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

| Nil | | | | | | |
|---|----------------------------|-----|------------|----|------------|----------------|
| [Details being provided in a CD/Digital Media] | \bigcirc | Yes | \bigcirc | No | \bigcirc | Not Applicable |
| | Ŭ | | Ŭ | | U | |
| Commute the state that had fair data the of two of an | \sim | | \sim | | | |
| Separate sheet attached for details of transfers | $igodoldsymbol{	extbf{O}}$ | Yes | \bigcirc | 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 | 09/09/2020 | |
|---|------------|--|
| | | |

| Date of registration o | of transfer (Date Month | n Year) | | | |
|--|--|---------|--|-----------------------|--|
| Type of transfer 1 - Equity, 2- Preference Shares, 3 - Debentures, 4 - Stock | | | | | |
| Number of Shares/ E Units Transferred | lumber of Shares/ Debentures/ Inits Transferred Debenture/Unit (in Rs.) | | | | |
| Ledger Folio of Trans | sferor | | | | |
| Transferor's Name | | | | | |
| | Surname | | middle name | first name | |
| Ledger Folio of Trans | sferee | | | | |
| | | | | | |
| Transferee's Name | | | | | |
| | Surname | | middle name | first name | |
| Date of registration of transfer (Date Month Year) | | | | | |
| Date of registration c | of transfer (Date Month | n Year) | | | |
| Date of registration of Type of transfe | | _ | uity, 2- Preference Shares,3 - | Debentures, 4 - Stock | |
| | r | _ | uity, 2- Preference Shares,3 - Amount per Share/ Debenture/Unit (in Rs.) | Debentures, 4 - Stock | |
| Type of transfe Number of Shares/ E | r | _ | Amount per Share/ | Debentures, 4 - Stock | |
| Type of transfe Number of Shares/ D Units Transferred | r | _ | Amount per Share/ Debenture/Unit (in Rs.) | | |
| Type of transfe Number of Shares/ E Units Transferred Ledger Folio of Trans | r | _ | Amount per Share/ | Debentures, 4 - Stock | |
| Type of transfe Number of Shares/ E Units Transferred Ledger Folio of Trans | r Debentures/ sferor Surname | _ | Amount per Share/ Debenture/Unit (in Rs.) | | |
| Type of transfer Number of Shares/ E Units Transferred Ledger Folio of Trans Transferor's Name | r Debentures/ sferor Surname | _ | Amount per Share/ Debenture/Unit (in Rs.) | | |

(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 | | 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 a | 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

2,215,587,251

(ii) Net worth of the Company

534,524,097

VI. (a) *SHARE HOLDING PATTERN - Promoters

| S. No. | Category | Equ | Equity | | ence |
|--------|---|------------------|------------|------------------|------------|
| | | Number of shares | Percentage | Number of shares | Percentage |
| 1. | Individual/Hindu Undivided Family | | | | |
| | (i) Indian | 7,789,700 | 56.9 | 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) | 485,250 | 3.54 | 0 | |
| 10. | Others DIRECTORS RELATIVES | 1,285,000 | 9.39 | 0 | |
| | Total | 9,559,950 | 69.83 | 0 | 0 |

Total number of shareholders (promoters)

17

(b) *SHARE HOLDING PATTERN - Public/Other than promoters

| S. No. | Category | Equi | ity | Preference | | |
|--------|---|------------------|------------|------------------|------------|--|
| | | Number of shares | Percentage | Number of shares | Percentage | |
| 1. | Individual/Hindu Undivided Family | | | | | |
| | (i) Indian | 3,645,800 | 26.63 | 0 | | |
| | (ii) Non-resident Indian (NRI) | 4,000 | 0.03 | 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) | 480,000 | 3.51 | 0 | |
| 10. | Others | 0 | 0 | 0 | |
| | Total | 4,129,800 | 30.17 | 0 | 0 |

Total number of shareholders (other than promoters)

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

| 214 | |
|-----|--|
| 231 | |

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 | 17 | 17 |
| Members (other than promoters) | 229 | 214 |
| Debenture holders | 0 | 0 |

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

| Category | Number of directors at th beginning of the year | | | ectors at the end e 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 | 12.65 | 5.41 |
| B. Non-Promoter | 1 | 3 | 1 | 3 | 3.32 | 2.34 |
| (i) Non-Independent | 1 | 1 | 1 | 1 | 3.32 | 2.34 |
| (ii) Independent | 0 | 2 | 0 | 2 | 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 | 3 | 4 | 3 | 4 | 15.97 | 7.75 |

Number of Directors and Key managerial personnel (who is not director) as on the financial year end date 9

(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) |
|-------------------|------------|--------------------|--------------------------------|--|
| SUNIL KUMAR AGARV | 08680582 | Director | 320,000 | |
| MAYUR BHATT | 07586457 | Whole-time directo | 454,050 | |
| KISHORE KUMAR BAN | 03067387 | Director | 741,000 | |
| DWADASI VENKATA G | 02565046 | Director | 0 | |
| RAMA KOHLI | 01835824 | Director | 0 | |
| ANOOP KUMAR BANS | 01661844 | Managing Director | 1,145,250 | |
| SANJAY CHAMANLAL | 00350967 | Whole-time directo | 585,950 | |
| ANIRUDH SINGHAL | BELPS2753A | CFO | 56,000 | |
| ITIKA SINGHAL | BQWPS3567Q | Company Secretar | 0 | 30/06/2021 |

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

2

| Name | | beginning / during | change in decignation/ | Nature of change (Appointment/ Change in designation/ Cessation) |
|-------------------|----------|--------------------|------------------------|---|
| DWADASI VENKATA G | 02565046 | Director | 31/07/2020 | Appointment |
| CHETAN KUMAR | 00327687 | Director | 05/08/2020 | 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 | Attend | lance |
| | | C C | | % of total shareholding |
| | 09/09/2020 | 251 | 14 | 48.89 |

B. BOARD MEETINGS

*Number of meetings held 5

| S. No. | Date of meeting | Total Number of directors associated as on the date | | | | |
|--------|-----------------|---|------------------------------|-----------------|--|--|
| | | of meeting | Number of directors attended | % of attendance | | |
| 1 | 22/06/2020 | 7 | 6 | 85.71 | | |
| 2 | 31/07/2020 | 8 | 6 | 75 | | |
| 3 | 15/09/2020 | 7 | 7 | 100 | | |
| 4 | 10/11/2020 | 7 | 7 | 100 | | |
| 5 | 08/03/2021 | 7 | 7 | 100 | | |

C. COMMITTEE MEETINGS

| S. No. | Type of meeting | | Total Number of Members as | ļ A | Attendance |
|--------|--------------------|-----------------|-------------------------------|-------------------------------|-----------------|
| | meeting | Date of meeting | on the date of the meeting | Number of members attended | % of attendance |
| 1 | | 22/06/2020 | 3 | 3 | 100 |
| 2 | AUDIT COMM | 10/11/2020 | 3 | 3 | 100 |
| 3 | | 08/03/2021 | 3 | 3 | 100 |
| 4 | | 31/07/2020 | 3 | 2 | 66.67 |
| 5 | CORPORATE | 22/06/2020 | 3 | 3 | 100 |
| 6 | CORPORATE | 10/11/2020 | 3 | 3 | 100 |
| 7 | CORPORATE | 06/03/2021 | 3 | 3 | 100 |

| | | | Board Meetings | | | Committee Meetings | | | |
|-----------|-------------------------|--------|-----------------------------------|------|--------|-----------------------------------|--------------------|----------|--|
| S. No. | Name of the director | | Number of Meetings attended | % of | | Number of Meetings attended | % of attendance | held on | |
| | | attend | allended | | attend | allended | | (Y/N/NA) | |
| 1 | SUNIL KUMAI | 5 | 5 | 100 | 0 | 0 | 0 | | |
| 2 | MAYUR BHAT | 5 | 5 | 100 | 0 | 0 | 0 | | |
| 3 | KISHORE KU | 5 | 5 | 100 | 7 | 7 | 100 | | |
| 4 | DWADASI VE | 3 | 3 | 100 | 4 | 4 | 100 | | |
| 5 | RAMA KOHLI | 5 | 5 | 100 | 7 | 7 | 100 | | |
| 6 | ANOOP KUM | 5 | 5 | 100 | 0 | 0 | 0 | | |
| 7 | SANJAY CHA | 5 | 4 | 80 | 0 | 0 | 0 | | |

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil \square

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

| S. No. | Name | Designation | Gross Salary | Commission | Stock Option/ Sweat equity | Others | Total Amount |
|---------|----------------------|--------------------|-------------------|----------------------|-------------------------------|---------|-----------------|
| 1 | MR. ANOOP KUMA | MANAGING DIF | 2,400,000 | 0 | 0 | 300,000 | 2,700,000 |
| 2 | MR. MAYUR BHAT | WHOLE TIME D | 600,000 | 0 | 0 | 50,000 | 650,000 |
| 3 | MR. SANJAY SHA⊢ ₽ | WHOLE TIME D ₽ | 2,400,000 | 0 | 0 | 200,000 | 2,600,000 |
| | Total | | 5,400,000 | 0 | 0 | 550,000 | 5,950,000 |
| umber o | of CEO, CFO and Comp | bany secretary who | se remuneration d | etails to be entered | 1 | 2 | |

| S. No. | Name | Designation | Gross Salary | Commission | Stock Option/ Sweat equity | Others | Total Amount | | |
|----------|--|-------------|--------------|------------|-------------------------------|--------|-----------------|--|--|
| 1 | MR. ANIRUDH SIN | CFO | 650,000 | 0 | 0 | 0 | 650,000 | | |
| 2 | MS. ITIKA SINGHA ₽ | COMPANY SEC | 435,000 | 0 | 0 | 0 | 435,000 | | |
| | Total | | 1,085,000 | 0 | 0 | 0 | 1,085,000 | | |
| Number o | Number of other directors whose remuneration details to be entered | | | | | | | | |

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

3

| S. No. | Name | Designation | Gross Salary | Commission | Stock Option/ Sweat equity | Others | Total Amount |
|--------|-----------------|-------------|--------------|------------|-------------------------------|---------|-----------------|
| 1 | MR. DWADASI VEN | INDEPENDENT | 0 | 0 | 0 | 0 | 0 |
| 2 | MS. RAMA KOHLI | | 0 | 0 | 0 | 0 | 0 |
| 3 | MR. KISHORE KUN | DIRECTOR | 0 | 0 | 0 | 0 | 0 |
| 4 | MR. SUNIL KUMAR | DIRECTOR | 0 | 0 | 0 | 350,000 | 350,000 |
| | Total | | 0 | 0 | 0 | 350,000 | 350,000 |

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

| * A. | Whether the company has made compliances and disclosures in respect of applicable | Yes | \bigcirc | No |
|------|---|-----|------------|-----|
| | provisions of the Companies Act, 2013 during the year | 100 | \bigcirc | 110 |

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

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

| Name of the company/ directors/ officers | Date of Order | ISECTION LINGER WRICH | Details of appeal (if any) including present status |
|--|---------------|-----------------------|--|
| | | | |

(B) DETAILS OF COMPOUNDING OF OFFENCES NII

| Name of the company/ directors/ officers | | Name of the Act and section under which offence committed | Amount of compounding (in Rupees) |
|--|--|---|--------------------------------------|
| | | | |

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

• Yes O 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

NILESH A PRADHAN

Whether associate or fellow

Associate Fellow

3659

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 compiled with. I further declare that:

- 1. Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
- 2. All the required attachments have been completely and legibly attached to this form.

Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.

To be digitally signed by

| Director | | |
|---------------------------------------|----------|--------------------------------|
| DIN of the director | 01661844 | |
| To be digitally signed by | | |
| Company Secretary | | |
| O Company secretary in practice | | |
| Membership number 61747 | | Certificate of practice number |

Attachments

List of attachments

| List of share holders, debenture holders Approval letter for extension of AGM; Copy of MGT-8; Optional Attachement(s), if any | Attach Attach Attach Attach Attach | List of Shareholders as on 31032021.pdf MGT-8 31032021.pdf Status of share transfer as on 31032021.pd |
|--|--|---|
| | | Remove attachment |
| Modify Check Form | Prescrutiny | Submit |

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

| FOLIO NO. | DPCLID | NAME | HOLDING | TYPE OF SHARES |
|--|--|---|---------|--------------------------------|
| '1201060000676708 | '1201060000676708 | PRITESH RAMESHBHAI SHAH | | Equity Shares |
| '1201060002372598 | '1201060002372598 | RAJESH HIRALALJI DANGRA | | Equity Shares |
| '1201060002850397 | '1201060002850397 | OMPRAKASH TAORI HUF | | Equity Shares |
| '1201060002879716 | '1201060002879716 | DARSHAN ASHOK RATHI | | Equity Shares |
| 1201060002915667 | '1201060002915667 | PUJA RAJESH DANGRA | | Equity Shares |
| 1201060003164582 | 1201060003164582 | ANIL KUMAR AGRAWAL HUF | | Equity Shares |
| 1201060003873952 | 1201060003873952 | ANUJ KAPIL | | Equity Shares |
| 1201060100068991 | 1201060100068991 | Rajan Manoharlal Dhaddha | | Equity Shares |
| '1201060100205305 '1201060100205324 | '1201060100205305 '1201060100205324 | ASHOK ANANTRAI BAKHAI JAYSHREE ASHOK BAKHAI | | Equity Shares Equity Shares |
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| 'IN30045012848642 | 'IN30045012848642 | ANURAG THAKER | | Equity Shares |
| 'IN30045013444764 | 'IN30045013444764 | ANAND KUMAR JAIN | | Equity Shares |
| 'IN30045013640067 | 'IN30045013640067 | VIJAY KUMAR BANSAL | | Equity Shares |
| | | | | |
| 'IN30045014087234 | 'IN30045014087234 | SUNITA KHANDELWAL | | Equity Shares |
| 'IN30045014124990 | 'IN30045014124990 | RAJENDRA KUMAR KHANDELWAL | | Equity Shares |
| 'IN30045014177249 | 'IN30045014177249 | SONIKA BANSAL | 32000 | Equity Shares |
| 'IN30045014567864 | 'IN30045014567864 | BHAVIK SHAH | 4000 | Equity Shares |
| 'IN30047640004550 | 'IN30047640004550 | SANJIV BHAGATSINGH KHANDELWAL | 12000 | Equity Shares |
| 'IN30047640004592 | 'IN30047640004592 | RAJIV BHAGATSINGH KHANDELWAL | | Equity Shares |
| 'IN30051318618250 | 'IN30051318618250 | ASHISH KUMAR KHARIWAL | | Equity Shares |
| • | | ROHIT AGRAWAL | | |
| 'IN30051322692517 | 'IN30051322692517 | | | Equity Shares |
| 'IN30051380362419 | 'IN30051380362419 | VICKY CHANDAN LAKHWANI | | Equity Shares |
| 'IN30094010173896 | 'IN30094010173896 | VIKAS SHAH | | Equity Shares |
| 'IN30112716008417 | 'IN30112716008417 | CHAMANLAL KHUSHALJI SHAH | 395500 | Equity Shares |
| 'IN30114311457287 | 'IN30114311457287 | SAVITA SHARMA | 4000 | Equity Shares |
| 'IN30133017086094 | 'IN30133017086094 | RAJENDRA KHANDELWAL | 4000 | Equity Shares |
| 'IN30133020123040 | 'IN30133020123040 | KAMAL KUMAR MAJUMDAR | | Equity Shares |
| 'IN30135620422774 | 'IN30135620422774 | YOGESHKUMAR DESAI M | | Equity Shares |
| 'IN30135020422774 | 'IN30148510611370 | ALKA VIJAYKUMAR BHANDARI | | Equity Shares |
| | 'IN30148520258357 | | | |
| 'IN30148520258357 | | POONAM KHANDELWAL | | Equity Shares |
| 'IN30154915485617 | 'IN30154915485617 | ASHOK KUMAR DAS | | Equity Shares |
| 'IN30154919607449 | 'IN30154919607449 | SHUBHAM GOYAL | | Equity Shares |
| 'IN30154930737558 | 'IN30154930737558 | SANJAY AGARWAL | | Equity Shares |
| 'IN30154935637135 | 'IN30154935637135 | PATEL HIMAXI RAKESHBHAI | 4000 | Equity Shares |
| 'IN30154955017689 | 'IN30154955017689 | RAM KUMAR AGRAWAL | | Equity Shares |
| 'IN30154958189550 | 'IN30154958189550 | MEHUL KRISHNACHANDRA PATEL | | Equity Shares |
| 'IN30154958274025 | 'IN30154958274025 | ISHANI MEHUL PATEL | | Equity Shares |
| | | | | |
| 'IN30155721270056 | 'IN30155721270056 | ANJU GROVER | | Equity Shares |
| 'IN30160411743766 | 'IN30160411743766 | SUNDER LAL BANSAL | | Equity Shares |
| 'IN30177414449261 | 'IN30177414449261 | SAVITA SACHDEVA | | Equity Shares |
| | 'IN30177416732798 | SEEMA KATHURIA | 2000 | Equity Shares |
| 'IN30177416732798 | 11130177410732798 | | | Equity Shares |
| 'IN30177416732798 'IN30214810126888 | 'IN30214810126888 | ARVIND M JAIN | 4000 | Liquity Shares |
| 'IN30214810126888 | 'IN30214810126888 | ARVIND M JAIN VIJAY KUMAR MISHRA | | |
| 'IN30214810126888 'IN30226910742881 | 'IN30214810126888 'IN30226910742881 | VIJAY KUMAR MISHRA | 4000 | Equity Shares |
| 'IN30214810126888 'IN30226910742881 'IN30226914626824 | 'IN30214810126888 'IN30226910742881 'IN30226914626824 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI | 4000 2000 | Equity Shares Equity Shares |
| 'IN30214810126888 'IN30226910742881 'IN30226914626824 'IN30226914626996 | 'IN30214810126888 'IN30226910742881 'IN30226914626824 'IN30226914626996 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI DHARMESHKUMAR VINODKUMAR DESAI | 4000 2000 2000 | Equity Shares Equity Shares Equity Shares |
| ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 | ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI DHARMESHKUMAR VINODKUMAR DESAI KANIKA GUPTA | 4000 2000 2000 4000 | Equity Shares Equity Shares Equity Shares Equity Shares |
| ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 ¹ IN30231610343728 | ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 ¹ IN30231610343728 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI DHARMESHKUMAR VINODKUMAR DESAI KANIKA GUPTA KUSUM GUPTA | 4000 2000 2000 4000 44000 | Equity Shares Equity Shares Equity Shares Equity Shares Equity Shares |
| ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 | ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 ¹ IN30231610343728 ¹ IN30236510994989 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI DHARMESHKUMAR VINODKUMAR DESAI KANIKA GUPTA | 4000 2000 2000 4000 44000 | Equity Shares Equity Shares Equity Shares Equity Shares |
| ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 ¹ IN30231610343728 | ¹ IN30214810126888 ¹ IN30226910742881 ¹ IN30226914626824 ¹ IN30226914626996 ¹ IN30231610166934 ¹ IN30231610343728 | VIJAY KUMAR MISHRA DESAI BIJAL DHARMESHBHAI DHARMESHKUMAR VINODKUMAR DESAI KANIKA GUPTA KUSUM GUPTA | 4000 2000 2000 4000 44000 324000 | Equity Shares Equity Shares Equity Shares Equity Shares Equity Shares |

| 'IN30267931876175 | 'IN30267931876175 | RAHUL DEV BANSAL | 66000 | Equity Shares |
|-------------------|-------------------|---|--------|---------------|
| 'IN30267933528400 | 'IN30267933528400 | NIVEA JAIN | 4000 | Equity Shares |
| 'IN30267934095819 | 'IN30267934095819 | NIDHI AGARWAL | 4000 | Equity Shares |
| 'IN30267935332894 | 'IN30267935332894 | BEENA AGRAWAL | 4000 | Equity Shares |
| 'IN30289810028379 | 'IN30289810028379 | RETSINA MARKETING PVT.LTD | 52000 | Equity Shares |
| 'IN30290240029748 | 'IN30290240029748 | SATYA DEO MISHRA | 12000 | Equity Shares |
| 'IN30290245361224 | 'IN30290245361224 | SEEMA MISHRA | 34000 | Equity Shares |
| 'IN30290246237308 | 'IN30290246237308 | SATYA DEO MISHRA | 6000 | Equity Shares |
| 'IN30290247780175 | 'IN30290247780175 | GAURAV AGARWAL | 56000 | Equity Shares |
| 'IN30292710289234 | 'IN30292710289234 | MOHIT BASER | 4000 | Equity Shares |
| 'IN30302852430403 | 'IN30302852430403 | ANUPAM KUMAR | 4000 | Equity Shares |
| 'IN30302852849732 | 'IN30302852849732 | DAMAYANTI MISHRA | 46000 | Equity Shares |
| 'IN30302859249861 | 'IN30302859249861 | SAILESH MISHRA | 36000 | Equity Shares |
| 'IN30302864566448 | 'IN30302864566448 | RISHAB JAIN | 4000 | Equity Shares |
| 'IN30302875302653 | 'IN30302875302653 | C R ANANDAKUMAR | 4000 | Equity Shares |
| 'IN30302883123337 | 'IN30302883123337 | MUNNI LAL DUGAR | 2000 | Equity Shares |
| 'IN30305210520344 | 'IN30305210520344 | RUCHITA SUMEETH HARAN | 2000 | Equity Shares |
| 'IN30311611657001 | 'IN30311611657001 | KAUSHIK SURENDRA SHAH | 2000 | Equity Shares |
| 'IN30327010969759 | 'IN30327010969759 | LAXMI NARAYAN SOMAYAJI | 4000 | Equity Shares |
| 'IN30359110054910 | 'IN30359110054910 | AMARAW RAMPURIA | 4000 | Equity Shares |
| 'IN30371910960868 | 'IN30371910960868 | SANJAY POPATLAL JAIN | 218000 | Equity Shares |
| 'IN30371910971171 | 'IN30371910971171 | SANGEETA MUKESH RAWAL | 22000 | Equity Shares |
| 'IN30383310222922 | 'IN30383310222922 | PAWAN SHYAMSUNDER BHALOTIYA | 24000 | Equity Shares |
| 'IN30383310222955 | 'IN30383310222955 | UMESH SHYAMSUNDER BHALOTIA | 4000 | Equity Shares |
| 'IN30412310011883 | 'IN30412310011883 | SHRUTI VIKAS SHAH | 4000 | Equity Shares |
| 'IN30611410233636 | 'IN30611410233636 | ANIRUDH SINGHAL | 56000 | Equity Shares |
| 'IN30611412331343 | 'IN30611412331343 | NATIONAL STOCK EXCHANGE OF INDIA LIMITED ACCOUNT GUINESS SECURITIES LIMITED | 8700 | Equity Shares |

Draft

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 **SARTHAK METALS LIMITED** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on 31st March, 2021. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the company, its officers and agents, 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 generally 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 therefore;

3. The Company has filed the applicable forms and returns with the Registrar of Companies within time in majority cases. The Company was not required to file any forms and returns with the Central Government during the financial year under consideration.

4. The Company has complied with the provisions for calling/ convening/ holding meetings of Board of Directors and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, notices were given. No circular resolution was passed. The Minutes Book was maintained and signed.

5. The Company has the closed Register of Members during the financial year under consideration.

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

7. The Company has complied with the necessary provisions with respect to contracts/arrangements with related parties as specified in Section 188 of the Act during the financial year under consideration.

8. The Company has complied with the provisions of transfer/transmission of securities during the financial year under consideration. There was no allotment of shares during the financial year under consideration. There was no buy-back of the securities during the financial year under consideration. There was no redemption of preference shares /debentures during the financial year under consideration. There was no alteration/reduction of share during the financial year under consideration.

9. As explained to us and based on the information provided to us, the provisions regarding keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares were not applicable to the Company.

10. The Company has complied with the provisions of declaration of Dividend during the financial year under consideration. The provisions related to transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund were not applicable to the Company.

11. The financial statements were signed as per the provisions of the Companies Act, 2013. The provisions of sub - sections (3), (4) and (5) of Section 134 of the Act were followed for drafting the Board's Report.

12. The Board of Directors was duly constituted. The Company has received disclosures from all the Directors. The Company has complied with the relevant provisions of the Companies Act, 2013 with respect to remuneration to Directors.

13. The appointment of auditors was undertaken as per the provisions of Section 139 of the Act.

14. The Company was not required to obtain any approval from the Central Government, Tribunal, Court or such other authorities under the various provisions of the Act.

15. The Company has not accepted/ renewed/ repaid any deposits during the financial year under consideration.

16. The Company has complied with relevant provisions with respect to borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable.

17. The Company has not made any loans and investments or given guarantees or provided securities to other bodies corporate or persons falling under the provisions of section 186 of the Act.

18. There was no alteration in the provisions of Memorandum of Association and Articles of Association during the financial year under consideration.

Note: Relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic have been considered.

For Nilesh A. Pradhan & Co., LLP Company Secretaries Prajakta Padhye Partner CP No: 7891 FCS No.:7478 **UDIN:**

Date: Place: Dombivali

Note: This report should be read with our letter which is annexed as Annexure I and forms integral part of this report.

ANNEXURE -I

To, SARTHAK METALS LIMITED B.B.C COLONY, KHURSPAR, G.E. ROAD, BHILAI –490011

Our report of even date is to be read along with this letter

1. Maintenance of Secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.

2. We have followed the audit practices 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 Annual Return (MGT-7). We believe that the processes and practices that we followed provide a reasonable basis for our opinion.

3. The compliance of the Companies Act,2013 is the responsibility of management. Our examination was limited to the verification of procedures on test basis.

Company Secretaries

Prajakta Padhye Partner FCS No: 7478 COP No: 7891

UDIN:

Place: Dombivali Date:



CS sarthak metals <cs@sarthakmetals.com>

: Status of share transfer as on 31st March, 2021-Sarthak Metal Ltd

1 message

joy <joyv@bigshareonline.com> To: CS sarthak metals <cs@sarthakmetals.com>, jibu@bigshareonline.com Cc: Itika Singhal <itika.singhal2@gmail.com>, Anirudh Singhal <anirudh@sarthakmetals.com>

Wed, Jul 21, 2021 at 6:14 PM

Dear Sir/Madam,

Unit : Sarthak Metal Ltd

This is to inform you that we have not received any Physical Transfer/Transmission during the period 01.04.2020 to 31.03.2021.

 Thanks & Regards

 Joy Varghese

 Bigshare Services Pvt. Ltd

 1st Floor | Bharat Tin Works Building | Opp. Vasant Oasis |

 Makwana Road| Marol | Andheri East | Mumbai 400059 |

 Board No : 022-62638222 | Mob 7045571837 | Direct No.: 022-62638236 |

 www.bigshareonline.com

 Image: Comparison of the set of the se

Branches : Hyderabad | New Delhi | Ahmedabad

Bigshare Online Securities System (BOSS). Now available as Mobile App



From: CS sarthak metals [mailto:cs@sarthakmetals.com] Sent: Wednesday, July 21, 2021 3:52 PM To: Joy Varghese; jibu@bigshareonline.comCc: Itika Singhal; Anirudh SinghalSubject: Status of share transfer as on 31st March, 2021

Dear Sir,

Please provide us with the details of the request received to Bigshare for share transfer of Sarthak Metals Limited as on 31st of March, 2021.

we request you to provide us the details at earliest.

Thanks & Regards,

Pratik Jain

Company Secretary & Compliance Officer

Sarthak Metals Limited