

FORM NO. MGT 9

EXTRACT OF ANNUAL RETURN

as on financial year ended on March 31, 2021

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

I. REGISTRATION & OTHER DETAILS:

i)	CIN	L05005AP1987PLC018436
ii)	Registration Date	November 23, 1987
iii)	Name of the Company	The Waterbase Limited
iv)	Category/Sub-category of the Company	Company Limited by Shares/Indian Non-Government Company
v)	Address of the Registered office & contact details	Ananthapuram Village, Nellore, Andhra Pradesh – 524344; Registered Office Contact: 91000 18037; Corporate Office Contact: 044 – 4566 1700, Fax: 044 - 4566 1799
vi)	Whether listed company	Listed at BSE Ltd.
vii)	Name, Address & contact details of the Registrar & Transfer Agent, if any.	M/s Cameo Corporate Services Limited Subramaniam Building No. 1, Club House Road, Chennai – 600 002 Phone: 044-28460390 / 391/ 392 / 393 / 394, Fax: 044-28460129 Email: investor@cameoindia.com

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10% or more of the total turnover of the Company

SI. No	. Name & Description of main products / services	NIC Code of the product /service	% to total turnover of the Company
1	Manufacture of prepared animal feeds	10809	89.65%
	(Manufacture of/ Trading in Shrimp feed)		

III. PARTICULARS OF HOLDING, SUBSIDIARY & ASSOCIATE COMPANIES

SI. No	Name & Address of the Company	CIN/GLN	Holding/ Subsidiary/ Associate	% of / Shares held	Applicable Section
1	Navsrijit Shakti Telangana Private Limited, 3 rd Floor Plot No. 715A, Jublee Hills Hyderabad Telengana - 500033	U74900TG2015PTC100196	Holding	52.95	Section 2(46) of the Companies Act, 2013
2	Saatatya Vistaar Oorja Bengaluru Private Limited "Thapar Niketan", Ground Floor, 7/4, Brunton Road, Bangalore, Karnataka - 560025	U74900KA2015PTC080716	Subsidiary	100	Section 2(46) of the Companies Act, 2013

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

(i) Category-wise Share Holding

Name of the Company	: THE WATERBASE LIMITED
Face Value	: 10 /-
Paidup Shares as on 01-Apr-2020	: 4,14,26,779
Paidup Shares as on 31-Mar-2021	: 4,14,26,779



IV. SHAREHOLDING PATTERN (EQUITY SHARE CAPITAL BREAK UP AS A PERCENTAGE OF TOTAL EQUITY)

(i) Category- Wise Shareholding

	Category- wise snarenoid		No. of sh	ares held			No. of sha	ares held		
		at tl		ng of the ye	ar	at the end of the year			%	
	Category of . Shareholder	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	Change during the year
Α.	SHAREHOLDING OF PROMOTER AND PROMOTER GROUP									,
1.	INDIAN									
a.	Individuals/Hindu Undivided Family	4,00,800	0	4,00,800	0.9674	4,00,800	0	4,00,800	0.9674	0.0000
b.	Central Government/ State Government(s)	0	0	0	0.0000	0	0	0	0.0000	0.0000
c.	Bodies Corporate	2,74,05,294	0	2,74,05,294	66.1535	2,81,23,533	0	2,81,23,533	67.8873	1.7337
d.	Financial Institutions/ Banks	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	Any Other									
	SUB - TOTAL (A)(1)	2,78,06,094	0	2,78,06,094	67.1210	2,85,24,333	0	2,85,24,333	68.8548	1.7337
2.	FOREIGN									
a.	Individuals (Non- Resident Individuals/ Foreign Individuals)	0	0	0	0.0000	0	0	0	0.0000	0.0000
b.	Bodies Corporate	0	0	0	0.0000	0	0	0	0.0000	0.0000
c.	Institutions	0	0	0	0.0000	0	0	0	0.0000	0.0000
d.	Qualified Foreign Investor	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	Any Other									
	SUB - TOTAL (A)(2)	0	0	0	0.0000	0	0	0	0.0000	0.0000
	TOTAL SHARE HOLDING OF PROMOTER AND PROMOTER GROUP (A) = (A)(1)+(A)(2)	2,78,06,094	0	2,78,06,094	67.1210	2,85,24,333	0	2,85,24,333	68.8548	1.7337
В.	PUBLIC SHAREHOLDING									
1.	INSTITUTIONS									
l.	FPI (Individual) Category II-	0	0	0	0.0000	0	0	0	0.0000	0.0000
a.	Mutual Funds/UTI	0	7,000	7,000	0.0168	0	6,000	6,000	0.0144	-0.0024
b.	Financial Institutions/ Banks	17,735	434	18,169	0.0438	300	434	734	0.0017	-0.0420
c.	Central Government/ State Government(s)	0	0	0	0.0000	0	0	0	0.0000	0.0000
e.	Insurance Companies	0	0	0	0.0000	0	0	0	0.0000	0.0000
f.	Foreign Institutional Investors	0	1,600	1,600	0.0038	0	1,600	1,600	0.0038	0.0000
g.	Foreign Venture Capital Investors	0	0	0	0.0000	0	0	0	0.0000	0.0000
h.	Qualified Foreign Investor	0	0	0	0.0000	0	0	0	0.0000	0.0000
i.	Any Other	_								
	SUB - TOTAL (B)(1)	17,735	9,034	26,769	0.0646	300	8,034	8,334	0.0201	-0.0445



			No. of sh	ares held			No. of sh	ares held		
		at th	ne beginni	ng of the ye	ar	a	t the end	of the year		%
					% of				% of	Change
SI.	Category of				Total				Total	during
No.	Shareholder	Demat	Physical	Total	Shares	Demat	Physical	Total	Shares	the year
2.	NON-INSTITUTIONS									
a.	Bodies Corporate	11,32,286	94,000	12,26,286	2.9601	3,19,416	91,500	4,10,916	0.9919	-1.9682
b.	Individuals -									
	I Individual shareholders holding nominal share capital upto Rs. 1 Lakh	80,96,471	14,69,405	95,65,876	23.0910	88,79,863	14,46,455	1,03,26,318	24.9266	1.8356
	li Individual shareholders holding nominal share capital in excess of Rs. 1 Lakh	14,71,895	40,000	15,11,895	3.6495	12,95,456	40,000	13,35,456	3.2236	-0.4259
c.	Qualified foreign investor	0	0	0	0.0000	0	0	0	0.0000	0.0000
d.	Any Other									
	Clearing Members	1,14,441	0	1,14,441	0.2762	1,33,992	0	1,33,992	0.3234	0.0471
	Hindu Undivided Families	4,64,419	2,300	4,66,719	1.1266	2,99,965	100	3,00,065	0.7243	-0.4022
	Non Resident Indians	4,33,560	8,100	4,41,660	1.0661	3,75,954	8,100	3,84,054	0.9270	-0.1390
	Overseas Corporate Bodies	2,64,228	2,800	2,67,028	0.6445	0	2,800	2,800	0.0067	-0.6378
	Trusts	11	0	11	0.0000	511	0	511	0.0012	0.0012
		12,76,659	13,200	12,89,859	3.1135	8,10,422	11,000	8,21,422	1.9828	-1.1307
	SUB - TOTAL (B)(2)	1,19,77,311	16,16,605	1,35,93,916	32.8143	1,13,05,157	15,88,955	1,28,94,112	31.1250	-1.6892
	TOTAL PUBLIC SHAREHOLDING	1,19,95,046	16,25,639	1,36,20,685	32.8789	1,13,05,457	15,96,989	1,29,02,446	31.1451	-1.7337
	(B) = (B)(1)+(B)(2)									
	TOTAL (A)+(B)	3,98,01,140	16,25,639	4,14,26,779	100.0000	3,98,29,790	15,96,989	4,14,26,779	100.0000	0.0000
C.	SHARES HELD BY									
	CUSTODIANS AND AGAINST WHICH DEPOSITORY RECEIPTS									
	HAVE BEEN ISSUED									
	Promoter and Promoter Group	0	0	0	0.0000	0	0	0	0.0000	0.0000
	Public	0	0	0	0.0000	0	0	0	0.0000	0.0000
	TOTAL CUSTODIAN (C)	0	0	0	0.0000	0	0	0	0.0000	0.0000
	GRAND TOTAL (A)+(B)+(C)	3,98,01,140	16,25,639	4,14,26,779	100.0000	3,98,29,790	15,96,989	4,14,26,779	100.0000	0.0000

(ii) Shareholding of Promoters

			o. of shares h beginning of			No. of s at the en		
				% of Shares pledged /			% of Shares pledged /	% change in
			% of total	encumbered		% of total	encumbered	shareholding
SI.		Number of	number of	to total	Number of	number of	to total	during the
No.	Shareholders Name	shares	shares	shares	shares	shares	shares	year
1	Mr. Vikramaditya Mohan Thapar	53,750	0.13%	0.00	53,750	0.13%	0.00%	0.00%
2	Mrs. Jyoti Thapar	73,500	0.18%	0.00	73,500	0.18%	0.00%	0.00%
3	Ms. Ayesha Thapar	51,875	0.13%	0.00	51,875	0.13%	0.00%	0.00%
4	Ms. Nitasha Thapar	51,875	0.13%	0.00	51,875	0.13%	0.00%	0.00%
5	Mr. Varun Aditya Thapar	1,69,800	0.41%	0.00	1,69,800	0.41%	0.00%	0.00%
6	Nav Srijit Shakti Telangana Private Limited	2,19,34,545	52.95%	0.00	2,19,34,545	52.95%	0.00%	0.00%
7	Karam Chand Thapar & Bros (Coal Sales Ltd)	32,41,719	7.83%	0.00	32,41,719	7.83%	0.00%	0.00%
9	KCT Financial & Management Services Private Limited	22,29,030	5.38%	0.00	29,47,269	7.11%	0.00%	1.73%
	Total	2,78,06,094	67.12%	0.00	2,85,24,333	68.85%	0.00%	1.73%



(iii) Change in Shareholding of Promoters

			Shareholding at the beginning of the year		hareholding ne year
SI. No	. Shareholders Name	Number of Shares	% of total shares of the Company	Number of Shares	% of total shares of the Company
1	Mr. Vikramaditya Mohan Thapar				
	At the beginning of the year	53,750	0.13%	53,750	0.13%
	At the end of the year			53,750	0.13%
2	Mrs. Jyoti Thapar				
	At the beginning of the year	73,500	0.18%	73,500	0.18%
	At the end of the year			73,500	0.18%
3	Ms. Ayesha Thapar				
	At the beginning of the year	51,875	0.13%	51,875	0.13%
	At the end of the year			51,875	0.13%
4	Ms. Nitasha Thapar				
	At the beginning of the year	51,875	0.13%	51,875	0.13%
	At the end of the year	-		51,875	0.13%
5	Mr. Varun Aditya Thapar				
	At the beginning of the year	1,69,800	0.41%	1,69,800	0.41%
	At the end of the year	-		1,69,800	0.41%
6	Nav Srijit Shakti Telangana Private Limited				
	At the beginning of the year	2,19,34,545	52.95%	2,19,34,545	52.95%
	At the end of the year			2,19,34,545	52.95%
7	Karam Chand Thapar & Bros (Coal Sales Ltd)				
	At the beginning of the year	32,41,719	7.83%	32,41,719	7.83%
	At the end of the year			32,41,719	7.83%
8	KCT Financial & Management Services Private	Limited			
	(Formerly KCT Management Services Private L	.td.)#			
	At the beginning of the year	22,29,030	5.38%	22,29,030	5.38%
	Purchase June 19,2020	1,55,620	0.38%	23,84,650	5.76%
	Purchase June 26,2020	2,27,419	0.55%	26,12,069	6.31%
	Inter-Se Sale August 07,2020	(3,83,039)	-0.92%	22,29,030	5.38%
	Inter Se Purchases on August 07, 2020	3,83,039	0.92%	26,12,069	6.31%
	Purchase September 18,2020	3,25,000	0.78%	29,37,069	7.09%
	Purchase October 01, 2020	10,200	0.02%	29,47,269	7.11%
	At the end of the year			29,47,269	7.11%

[#] During the year the name of KCT Management Services Private Ltd was changed to KCT Financial & Management Services Private Limited. Also the Company is having 2 Demat Accounts under the same Name and PAN, hence details have been clubbed.



(iv) Shareholding Pattern of top 10 Shareholders (other than Directors, Promoters and Holders of GDR and ADRs)

		Sharehold beginning o		Cumulative Shareholding during the year		
SI. No.	Shareholders Name	Number of Shares	% of total shares of the Company	Number of Shares	% of total shares of the Company	
1	LINCOLN P COELHO JOINT WITH KIRAN S					
-	COELHO					
	At the beginning of the year	3,01,000	0.73%	3,01,000	0.73%	
	At the end of the year			3,01,000	0.73%	
2	MANOJ KUMAR DAWAR & KUSUM DAWAR		-	· · ·		
	At the beginning of the year	1,07,036	0.26%	1,07,036	0.26%	
	At the end of the year			1,07,036	0.26%	
3	DHARAM PAL YADAV		_	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
	At the beginning of the year	87,000	0.21%	87,000	0.21%	
	At the end of the year	0.7000	0,2.70	87,000	0.21%	
4	MARYKUTTY JOSE			0.7000		
	At the beginning of the year	59,500	0.14%	59,500	0.14%	
	At the end of the year	22,200		59,500	0.14%	
5	SUNILKUMAR DIPLAL SHAH			22,000		
	At the beginning of the year	54,950	0.13%	54,950	0.13%	
	At the end of the year	3 1,330	0.1370	54,950	0.13%	
6	SUSHIL KUMAR KOHLI			5 1,555	0.1570	
	At the beginning of the year	54,100	0.13%	54,100	0.13%	
	At the end of the year	34,100	0.1370	54,100	0.13%	
7	VANDANA GUPTA			54,100	0.1570	
	At the beginning of the year	37,000	0.09%	37,000	0.09%	
	At the end of the year	37,000	0.0570	37,000	0.09%	
8	LONG VIEW DISTRIBUTORS PRIVATE LIMITED			37,000	0.0570	
	At the beginning of the year	34,000	0.08%	34,000	0.08%	
	At the end of the year	34,000	0.0070	34,000	0.08%	
9	NAKUL KAMANI			34,000	0.0070	
	At the beginning of the year	29,938	0.07%	29,938	0.07%	
	At the end of the year	29,930	0.0770	29,938	0.07%	
10	MAHAVEER PRASAD GUPTA			29,936	0.0770	
	At the beginning of the year	35,000	0.08%	35,000	0.08%	
	Sale February 19, 2021	(7,000)	-0.02%	28,000	0.03%	
	At the end of the year	(7,000)	-0.0270	28,000	0.07%	
11	FLASH RISE LIMITED*			28,000	0.0770	
•••	At the beginning of the year	1,87,000	0.45%	1,87,000	0.45%	
	Sale April 17,2020	(41,000)	-0.10%	1,46,000	0.45%	
	Sale July 17,2020	(16,543)	-0.04%	1,29,457	0.33%	
	Sale July 17,2020 Sale July 24,2020		-0.07%			
	Sale September 30, 2020	(29,457)	0.00%	1,00,000	0.24% 0.24%	
	Sale October 01,2020	(1,945)	-0.04%	98,055 80,311	0.24%	
	Sale October 01,2020 Sale October 09,2020	(80,311)	-0.04%	00,511	0.19%	
	·	(80,511)	-0.1970			
12	At the end of the year NEHA NEAL TRADE PRIVATE LIMITED*			-	0.00%	
12		1 07 000	0.450/	1 07 000	0.450/	
	At the beginning of the year	1,87,000	0.45%	1,87,000	0.45%	
	Purchase April 17, 2020	12,236	0.03%	1,99,236	0.48%	
	Purchase April 17, 2020	11,000	0.03%	2,10,236	0.51%	
	Purchase May 29, 2020	6,941	0.02%	2,17,177	0.52%	



		Sharehold beginning o		Cumulative Shareholding during the year		
SI.	. Shareholders Name	Number of Shares	% of total shares of the	Number of Shares	% of total shares of the	
NO			Company		Company	
	Sale June 05, 2020	(13,941)	-0.03%	2,03,236	0.49%	
	Sale June 26, 2020	(1,000)	0.00%	2,02,236	0.49%	
	Purchase June 30, 2020	1,000	0.00%	2,03,236	0.49%	
	Sale September 18, 2020	(2,03,236)	-0.49%	<u>-</u>	0.00%	
42	At the end of the year				0.00%	
13		1 50 022	0.200/	1 50 022	0.200/	
	At the beginning of the year	1,59,023	0.38%	1,59,023	0.38%	
	Sale May 15, 2020	(1,34,023)	-0.32%	25,000	0.06%	
	Sale May 22, 2020	(25,000)	-0.06%	-	0.00%	
	At the end of the year			-	0.00%	
14	FE SECUTRITIES PVT LTD *	4.55.000	0.070/	4.55.000	0.270/	
	At the beginning of the year	1,55,000	0.37%	1,55,000	0.37%	
	Sale April 10, 2020	(1,10,000)	-0.27%	45,000	0.11%	
	Purchase April 10,2020	1,25,845	0.30%	1,70,845	0.41%	
	Sale April 17, 2020	(45,000)	-0.11%	1,25,845	0.30%	
	Sale 17 April,2020	(1,17,845)	-0.28%	8,000	0.02%	
	Sale April 24, 2020	(8,000)	-0.02%	-	0.00%	
	Purchase May 15,2020	10,000	0.02%	10,000	0.02%	
	Sale May 22,2020	(10,000)	-0.02%	-	0.00%	
	Purchase November 20,2020	25	0.00%	25	0.00%	
	Sale November 27,2020	(25)	0.00%	-	0.00%	
	Purchase March 31,2021	500	0.00%	500	0.00%	
	At the end of the year			500	0.00%	
15	MEHAK FINPRO INDIA PRIVATE LTD*					
	At the beginning of the year	1,47,812	0.36%	1,47,812	0.36%	
	Sale April 10, 2020	(1,36,369)	-0.33%	11,443	0.03%	
	Sale April 17, 2020	(11,443)	-0.03%	-	0.00%	
	At the end of the year			-	0.00%	
16	RAJPAD TRADERS PRIVATE LIMITED*					
	At the beginning of the year	80,500	0.19%	80,500	0.19%	
	Sale 18-Sep-2020	(80,500)	-0.19%	-	0.00%	
	At the end of the year		0.00%	-	0.00%	
17	NEAD TRADING AND INVESTMENTS LIMITED*					
	At the beginning of the year	77,228	0.19%	77,228	0.19%	
	Sale May 01,2020	(7,500)	-0.02%	69,728	0.17%	
	Sale May 08, 2020	(4,500)	-0.01%	65,228	0.16%	
	Sale May 15, 2020	(20,500)	-0.05%	44,728	0.11%	
	Sale May 22, 2020	(5,000)	-0.01%	39,728	0.10%	
	Sale June 05,2020	(10,000)	-0.02%	29,728	0.07%	
	Sale June 15, 2020	(5,000)	-0.01%	24,728	0.06%	
	Sale June 19, 2020	(5,000)	-0.01%	19,728	0.05%	
	Sale June 26, 2020	(10,000)	-0.02%	9,728	0.02%	
	Sale July 03, 2020	(728)	0.00%	9,000	0.02%	
	Sale July 17, 2020	(9,000)	-0.02%	-	0.00%	
	At the end of the year		0.00%		0.00%	

Note: Ceased to be in the list of Top 10 shareholders as on 31.03.2021. Details are shown above, since the shareholder was in the list of Top 10 shareholders as on 01.04.2020.



V. Shareholding of Directors and KMP

			Shareholding at the beginning of the year		hareholding ne year
SI. No.	Name of Director / KMP	Number of Shares	% of total shares of the Company	Number of Shares	% of total shares of the Company
1	Ramakanth V Akula				
	At the beginning of the year	5	0.00	5	0.00
	At the end of the year			5	0.00
2	R. Sureshkumar				
	At the beginning of the year	-	0.00	-	-
	At the end of the year	1	0.00	1	0.00
3	R Achuthan				
	At the beginning of the year	-	0.00	-	-
	At the end of the year	1	0.00	1	0.00
	TOTAL	7	0.00	7	0.00

Note: Mr. Vikramaditya Mohan Thapar and Mr. Varun Aditya Thapar, Non Executive Directors, are holding shares in the Company. Their shareholding has been reported in the Promoter Shareholdings (P. No. IV (ii) & (iii)) above

VI. Indebtedness (₹ In lakhs)

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

(₹ Lakh)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtness at the beginning of the financial y	ear			
i) Principal Amount	1,242.23	-	-	1,242.23
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	6.88	-	-	6.88
Total (i+ii+iii)	1,249.11	-	-	1,249.11
Change in Indebtedness during the financial	year			
Additions	-	-	-	-
Reduction	1,249.11			1,249.11
Net Change	(1,249.11)	-	-	1,249.11
Indebtedness at the end of the financial year				
i) Principal Amount	-	-	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total (i+ii+iii)	-	-	-	-

VII. Remuneration of Directors and Key Managerial Personnel

A. Remuneration to Managing Director, Whole time Director and/or Manager: (Amount in ₹)

The Company does not have a Managing Director/ Whole-time Directors or Manager. Hence this section is not applicable.



B. Remuneration to other Directors:

(₹ Lakh)

SI.							
No.	Particulars of Remuneration	Name of the Directors					
1	Independent Directors	Anil Kumar Bhandari	Ranjit Mehta	Rahul Kapur	Shashikala Venkatraman	Total Amount	
	(a) Fee for attending Board / Committee meetings	2.00	1.50	1.60	1.35	6.45	
	(b) Commission (For FY 20-21)	2.87	2.87	2.87	2.87	11.48	
	(c) Others, please specify	-	-	-	-	-	
	Total (1)	4.87	4.37	4.47	4.22	17.93	
2	Other Non Executive Directors	Vikramaditya Mohan Thapar	Varun Aditya Thapar				
	(a) Fee for attending Board / Committee meetings	1.20	1.55			2.75	
	(b) Commission (For FY 20-21)	2.87	2.87			5.74	
	(c) Others, please specify.	-	-			-	
	Total (2)					8.49	
	Total (B)=(1+2)					26.42	
	Total Managerial Remuneration (A+B)					26.42	

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

(₹ Lakh)

		Key Managerial Personnel			
SI. No.	Particulars of Remuneration	Mr. Ramakanth V Akula (CEO)	Mr. R. Sureshkumar (CFO)	Mr. R. Achuthan (CS)*	Total
1	Gross Salary				
	(a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961.	199.42	72.22	18.41	290.05
	(b) Value of perquisites u/s 17(2) of the Income Tax Act, 1961	0.32	0.32	-	0.64
	(c) Profits in lieu of salary under section 17(3) of the Income Tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission as % of profit	-	-	-	-
5	Others, specify	-	-	-	-
	Total	199.74	72.54	18.41	290.69

 $^{^{\}star}$ Mr R. Achuthan resigned from the services of the company w.e.f. February 24, 2021



VIII Penalties/Punishment/Compounding of Offences

Туре	Section of the Companies Act	Brief Description	Details of Penalty/ Punishment/ Compounding fees imposed	Authority (RD/NCLT/ Court)	Appeal made if any (give details)
A. COMPANY					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil
B. DIRECTORS					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil
C. OTHER OFFICERS IN DEFAULT					
Penalty	Nil	Nil	Nil	Nil	Nil
Punishment	Nil	Nil	Nil	Nil	Nil
Compounding	Nil	Nil	Nil	Nil	Nil

For and on behalf of the Board of Directors

Vikramaditya Mohan Thapar Chairman

Chairman DIN: 00030967 Place: New Delhi **Anil Kumar Bhandari**

Director DIN: 00031194 Place: Coorg

Date: May 27, 2021