

ANNUAL RETURN

Form No. MGT-7

[Pursuant to sub-section (1) of section 92 of Companies Act, 2013 and sub-rule (1) of rule 11 of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS

i. Corporate Identification Number (CIN) of the Company: L55101TN1996PLC036595

Global Location Number (GLN) of the Company: NIL

Permanent Account Number (PAN) of the Company: AAACM6469L

ii. (a) Name of Company: MAHINDRA HOLIDAYS & RESORTS INDIA LIMITED

(b) Registered Office address: No. 17 & 18, 2nd Floor, Mahindra Towers, Patullos Road
Chennai, Tamil Nadu – 600002, India

(c) E-mail ID of the Company: investors@mahindraholidays.com

(d) Telephone number with STD code: 044 39881000

(e) Website: www.clubmahindra.com

iii. Date of Incorporation: 20/09/1996

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 the Company is having share capital: **YES**

vi. Whether shares listed on recognised Stock Exchange: **YES**

(a) Details of stock exchanges where shares are listed

Sr. No.	Stock Exchange Name	Code
1	National Stock Exchange of India Limited	1,024
2	BSE Limited	1

(b) CIN of the Registrar and Transfer Agent: U72400TG2017PTC117649

Name of the Registrar and Transfer Agent: KFin Technologies Private Limited

Registered office address of the Registrar and Transfer Agents: Selenium, Tower B, Plot No-31 & 32, Financial District, Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032
IN

vii. Financial Year From date: 01/04/2019 To date: 31/03/2020

viii. Whether Annual General Meeting held: **NO**

- (a) If yes, date of AGM: AGM is scheduled on 31/08/2020
 (b) Due date of AGM: 30/09/2020
 (c) Whether any extension for AGM granted: **NO**

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

Number of business activities: 2

Sr. No.	Main Activity Group Code	Description of Main activity Group	Business Activity Code	Description of Business Activity	% of turnover of the Company
1	I	Accommodation and Food Service	I1	Accommodation services provided by Hotels, Inns, Resorts, holiday homes, hostels, etc.	61.52
2	I	Accommodation and Food Service	I2	Food and beverage services provided by hotels, restaurants, caterers, etc.	13.51

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

Number of Companies for which information is to be given: **38**

Sr. No	Name of the Company	CIN/FCRN	Holding subsidiary/ Associate/ Joint Venture	% of shares held
1.	Mahindra & Mahindra Limited	L65990MH1945PLC004558	Holding	67.31
2.	Gables Promoters Private Limited	U45209CH2012PTC033473	Subsidiary	100
3.	Mahindra Hotels and Residences India Limited	U55101TN2007PLC063285	Subsidiary	100
4.	Heritage Bird (M) Sdn. Bhd.	-	Subsidiary	100
5.	MH Boutique Hospitality Limited	-	Subsidiary	49
6.	Infinity Hospitality Group Company Ltd	-	Subsidiary	73.99
7.	MHR Holdings (Mauritius) Ltd	-	Subsidiary	100
8.	Covington S.á.r.l.	-	Subsidiary	100
9.	HCR Management Oy	-	Subsidiary	100
10.	Holiday Club Resorts Oy	-	Subsidiary	100
11.	Holiday Club Sweden AB	-	Subsidiary	100
12.	Ownership Service Sweden AB	-	Subsidiary	100
13.	Holiday Club Canarias Investment S.L.U.	-	Subsidiary	100
14.	Holiday Club Canarias Sales & Marketing S.L.U.	-	Subsidiary	100
15.	Holiday Club Canarias Resort Management S.L.U.	-	Subsidiary	100

16.	Holiday Club Canarias Vacation Club SLU	-	Subsidiary	100
17.	Holiday Club Resorts Rus LLC	-	Subsidiary	100
18.	Suomen Vapaa-aikakiinteistöt Oy	-	Subsidiary	100
19.	Kiinteistö Oy Himos Gardens	-	Subsidiary	100
20.	Kiinteistö Oy Vanha Ykköstii	-	Subsidiary	100
21.	Kiinteistö Oy Katinnurkka	-	Subsidiary	100
22.	Kiinteistö Oy Tenetinlahti	-	Subsidiary	100
23.	Kiinteistö Oy Mällösniemi	-	Subsidiary	100
24.	Kiinteistö Oy Rauhan Ranta 1	-	Subsidiary	100
25.	Kiinteistö Oy Rauhan Ranta 2	-	Subsidiary	100
26.	Kiinteistö Oy Tiurunniemi	-	Subsidiary	100
27.	Kiinteistö Oy Rauhan Liikekiinteistöt 1	-	Subsidiary	100
28.	Supermarket Capri Oy	-	Subsidiary	100
29.	Kiinteistö Oy Kylpylätorni 1	-	Subsidiary	100
30.	Kiinteistö Oy Spa Lofts 2	-	Subsidiary	100
31.	Kiinteistö Oy Spa Lofts 3	-	Subsidiary	100
32.	Kiinteistö Oy Kuusamon Pulkajärvi 1	-	Subsidiary	100
33.	Holiday Club Sport and Spahotels AB	-	Subsidiary	51
34.	Äre Villa 3 AB	-	Subsidiary	100
35.	Arabian Dreams Hotel Apartments LLC	-	Joint Venture	49
36.	Guestline Hospitality Management & Development Services Limited	U55101KA1994PLC015472	Associate	49.94
37.	Kiinteistö Oy Seniori-Saimaa	-	Associate	31
38.	Tropiikin Rantasauna Oy	-	Joint Venture	50

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

i. SHARE CAPITAL

(a) Equity Share Capital

Particulars	Authorized capital	Issued capital	Subscribed capital	Paid-up capital
Total number of equity shares	150,000,000	133,553,784	133,553,784	133,553,784
Total amount of Equity Shares (in Rupees)	1,500,000,000	1,335,537,840	1,335,537,840	1,335,537,840

Number of classes: 1

Class of Shares (Equity Shares)	Authorized capital	Issued capital	Subscribed capital	Paid-up capital
Number of Equity Shares	150,000,000	133,553,784	133,553,784	133,553,784
Nominal value per share (in rupees)	10	10	10	10
Total amount of Equity Shares (in rupees)	1,500,000,000	1,335,537,840	1,335,537,840	1,335,537,840

(b) Preference Share Capital

Particulars	Authorized 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 Preference Shares	Authorized capital	Issued capital	Subscribed capital	Paid-up capital
Number of preference Shares	0	0	0	0
Nominal value per share (in Rupees)	0	0	0	0
Total amount of preference Shares (in Rupees)	0	0	0	0

(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				
At the beginning of the year	133,553,784	1,335,537,840	1,335,537,840	0
Increase during the year	0	0	0	0
i. Public issue	0	0	0	0
ii. Rights issue	0	0	0	0
iii. Bonus issue	0	0	0	0
iv. Private placement/ Preferential Allotment	0	0	0	0
v. ESOPs	0	0	0	0
vi. Sweat Equity shares allotted	0	0	0	0
vii. Conversion of preference shares	0	0	0	0
vii. Conversion of debentures	0	0	0	0
viii. GDRs/ ADRs	0	0	0	0
ix. Others, specify	0	0	0	0
Decrease during the year				
i. Buy-back of shares	0	0	0	0
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify	0	0	0	0
At the end of the year	133,553,784	1,335,537,840	1,335,537,840	0

Class of shares	Number of shares	Total nominal amount	Total paid-up amount	Total premium
Preference Shares				
At the beginning of the year	0	0	0	0
Increase during the year	0	0	0	0
i. Issue of shares	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0
iii. Others, specify	0	0	0	0
Decrease during the year				
i. Redemption of shares	0	0	0	0
ii. Shares forfeited	0	0	0	0
iii. Reduction of share capital	0	0	0	0
iv. Others, specify	0	0	0	0
At the end of the year	0	0	0	0

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

iii. Details of Shares /Debenture Transfer 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

iv. Indebtedness including 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
Secured Loans (including interest outstanding/accrued but not due for payment) excluding deposits	0	0	0
Unsecured Loans (including interest outstanding/accrued but not due for payment) excluding deposits	0	0	0
Deposits	0	0	0
Total	0	0	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): NA

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

- i. Turnover: Rs.10,371,179,098.21
- ii. Net worth of the Company*: Rs.8,412,844,551.50

* The net worth is derived after excluding revaluation reserve and transition difference.

VI. (a) SHAREHOLDING PATTERN- Promoters

Sr. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family	0	0	0	0
	(i) Indian	0	0	0	0
	(ii) Non-Resident Indian (NRI)	0	0	0	0
	(iii) Foreign National (other than NRI)	0	0	0	0
2	Government	0	0	0	0
	(i) Central Government	0	0	0	0
	(ii) State Government	0	0	0	0
	(iii) Government companies	0	0	0	0
3	Insurance Companies	0	0	0	0
4	Banks	0	0	0	0
5	Financial institutions	0	0	0	0
6	Foreign Institutional Investors	0	0	0	0
7	Mutual Funds	0	0	0	0
8	Venture Capital	0	0	0	0
9	Body Corporate (not mentioned above)	89,890,615	67.31	0	0
10	Others, specify	0	0	0	0
	Total	89,890,615	67.31	0	0

Total number of shareholders (promoters): 1

(b) SHAREHOLDING PATTERN- Public/ Other than promoters

Sr. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	13,690,021	10.25	0	0
	(ii) Non-Resident Indian (NRI)	591,461	0.44	0	0
	(iii) Foreign National (other than NRI)	0	0	0	0
2	Government		0		0
	(i) Central Government	0	0	0	0
	(ii) State Government	0	0	0	0
	(iii) Government companies	0	0	0	0
3	Insurance Companies	0	0	0	0
4	Banks	0	0	0	0

5	Financial institutions	40,132	0.03	0	0
6	Foreign Institutional Investors	7,188,839	5.38	0	0
7	Mutual Funds	19,292,051	14.45	0	0
8	Venture Capital	0	0	0	0
9	Body Corporate (not mentioned above)	1,256,748	0.94	0	0
10	Others (QFI, AIF, Clearing members, IEPF, NBFC, Trusts)	1,603,917	1.20	0	0
	Total	43,663,169	32.69	0	0

Total number of shareholders (other than promoters): 31,837

Total number of shareholders (Promoters + Public/ other than promoters): 31,838

(c) Details of Foreign institutional investors' (FIIs) holding shares of the company:

Name of the FII	Address	Country of Incorporation	Number of shares held	% of shares held
GOVERNMENT PENSION FUND GLOBAL	BANKPLASSEN 2 P O BOX 1179 SENTRUM OSLO 0107	NORWAY	4,521,344	3.39
PARVEST EQUITY INDIA	10 RUE EDWARD STEICHEN	LUXEMBOURG	1,017,380	0.76
EMERGING MARKETS CORE EQUITY PORTFOLIO (THE PORTFOLIO) OF DFA INVESTMENT DIMENSIONS GROUP INC. (DFAIDG)	6300 BEE CAVE ROAD BUILDING ONE AUSTIN TEXAS 78746 USA	UNITED STATES OF AMERICA	495,151	0.37
SUNDARAM INDIA MIDCAP FUND	21 COLLYER QUAY 13-02 HSBC BUILDING SINGAPORE	SINGAPORE	430,994	0.32
THE EMERGING MARKETS SMALL CAP SERIES OF THE DFA INVESTMENT TRUST COMPANY	6300 BEE CAVE ROAD BUILDING ONE AUSTIN TEXAS 78746 USA	UNITED STATES OF AMERICA	288,930	0.22
SHBNPP INDIA SECURITY MASTER EQUITY	HSBC BUILDING 25 1-KA BONGRAE-DONG CHUNG-KU SEOUL KOREA	SEOUL KOREA	186,596	0.14
INDIA MAX INVESTMENT FUND LIMITED	365 ROYAL ROAD ROSE HILL MAURITIUS	MAURITIUS	60,000	0.04
SPDR S AND P EMERGING MARKETS SMALL CAP ETF	ONE LINCOLN STREET BOSTON MA	UNITED STATES OF AMERICA	55,071	0.04
KOTAK MAHINDRA (INTERNATIONAL) LIMITED	4TH FLOOR LES CASCADES BUILDING EDITH CAVELL STREET PORT LOUIS	MAURITIUS	31,277	0.02
EMERGING MARKETS CORE EQUITY FUND OF DIMENSIONAL FUNDS ICVC	20 TRITON STREET REGENTS PLACE LONDON NW1 3BF U K	UNITED KINGDOM	24,440	0.02
WORLD EX U.S. CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	6300 BEE CAVE ROAD BUILDING ONE AUSTIN TEXAS 78746 USA	UNITED STATES OF AMERICA	23,215	0.02
T.A. WORLD EX U.S. CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	6300 BEE CAVE ROAD BUILDING ONE AUSTIN TEXAS 78746 USA	UNITED STATES OF AMERICA	17,869	0.01

CITY OF LOS ANGELES FIRE AND POLICE PENSION PLAN	360 E SECOND STREET SUITE 600 LOS ANGELES CA	UNITED STATES OF AMERICA	8,047	0.01
ALASKA PERMANENT FUND	801 WEST 10TH STREET JUNEAU ALASKA	UNITED STATES OF AMERICA	6,517	0.00
EMERGING MARKETS SOCIAL CORE EQUITY PORTFOLIO OF DFA INVESTMENT DIMENSIONS GROUP INC.	6300 BEE CAVE ROAD BUILDING ONE AUSTIN TEXAS 78746 USA	UNITED STATES OF AMERICA	6,412	0.00
JOHN HANCOCK FUNDS II EMERGING MARKETS FUND	601 CONGRESS STREET BOSTON MA 02210 2805 USA	UNITED STATES OF AMERICA	6,255	0.00
DFA INTERNATIONAL CORE EQUITY FUND	SUITE 1520 - 1500 WEST GEORGIA STREET VANCOUVER BRITISH COLUMBIA	CANADA	3,402	0.00
DIMENSIONAL FUNDS PLC - MULTI-FACTOR EQUITY FUND	25/28 NORTH WALL QUAY DUBLIN 1	IRELAND	2,940	0.00
UTAH STATE RETIREMENT SYSTEMS	540 EAST 200 SOUTH SALT LAKE CITY UTAH	UNITED STATES OF AMERICA	1,609	0.00
INTEGRATED CORE STRATEGIES ASIA PTE LTD	80 RAFFLES PLACE UOB PLAZA 2 14-20	SINGAPORE	1,390	0.00
TOTAL			7,188,839	5.38

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	1	1
Members (other than promoters)	34,732	31,837
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANGERIAL PERSONNEL

(A) Composition of Board of Directors

Category	Number of Directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-Executive	Executive	Non-Executive	Executive	Non-Executive
A. Promoter	0	0	0	0	0	0
B. Non- Promoter	1	7	1	7	0	1.02
(i) Non- Independent	1	2	1	2	0	0.95
(ii) Independent	0	5	0	5	0	0.07
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	1	7	1	7	0	1.02

Number of Directors and Key Managerial Personnel (who is not director) as on financial year end date: 10

(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)
Arun Kumar Nanda	00010029	Director	1,266,945	-
Sanjeev Aga	00022065	Director	0	-
Cyrus Jamshed Guzder	00080358	Director	-	01/08/2020
Parthasarathy Vankipuram Srinivasa	00125299	Director	0	-
Rohit Khattar	00244040	Director	40,050	-
Sridar Arvamudhan Iyengar	00278512	Director	10,313	-
Sangeeta Talwar	00062478	Additional Director	0	-
Kavinder Singh	06994031	Managing Director	0	-
Akhila Balachandar	ADTPA8685P	CFO	0	-
Dhanraj Narsappa Mulki	ACFPM4577P	Company Secretary	0	-

(ii) Particulars of change in director(s) and Key Managerial Personnel during the year: 2

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)
Radhika Shastri	01787918	Director	26/12/2019	Cessation
Sangeeta Talwar	00062478	Additional Director	01/02/2020	Appointment

IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/ COMMITTEES OF THE BOARD OF DIRECTORS

A. MEMBERS/CLASS/REQUISITIONED/NCLT/COURTCONVENED MEETINGS

Number of Meetings held: 1

Type of Meeting	Date of Meeting	Total Number of Members entitled to attend the Meeting	Attendance	
			Number of members attended	% of Total shareholding
Annual General Meeting	31/07/2019	33,657	634	68.35

B. BOARD MEETINGS

Number of Meetings Held: 5

Sr. No.	Date of Meeting	Total Number of Directors associated as on the date of meeting	Attendance	
			Number of Directors Attended	% of attendance
1	15/05/2019	8	8	100
2	31/07/2019	8	8	100
3	04/11/2019	8	6	75
4	01/02/2020	7	7	100
5	19/03/2020	8	8	100

C. COMMITTEE MEETINGS

Number of meetings held: 16

Sr. No.	Type of Meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1.	Audit Committee	15/05/2019	6	6	100
2.	Audit Committee	31/07/2019	6	6	100
3.	Audit Committee	04/11/2019	6	5	83.33
4.	Audit Committee	01/02/2020	5	4	80
5.	Nomination & Remuneration Committee	15/05/2019	4	4	100
6.	Nomination & Remuneration Committee	31/07/2019	4	4	100
7.	Nomination & Remuneration Committee	04/11/2019	4	3	75
8.	Nomination & Remuneration Committee	01/02/2020	4	4	100
9.	Stakeholders Relationship Committee	15/05/2019	4	4	100
10.	Stakeholders Relationship Committee	04/11/2019	4	3	75
11.	Corporate Social Responsibility Committee	15/05/2019	4	4	100
12.	Risk Management Committee	01/02/2020	4	4	100
13.	Independent Directors Meeting	15/05/2019	5	5	100
14.	Independent Directors Meeting	31/07/2019	5	5	100
15.	Independent Directors Meeting	04/11/2019	5	4	80
16.	Independent Directors Meeting	01/02/2020	4	4	100

D. ATTENDANCE OF DIRECTORS

Sr. No	Name of the director	Board Meetings			Committee Meetings		
		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
1	Arun Kumar Nanda	5	5	100	7	7	100
2	Sanjeev Aga	5	5	100	9	9	100
3	Cyrus Jamshed Guzder	5	4	80	16	12	75
4	Parthasarathy Vankipuram Srinivasa	5	4	80	7	6	85.71
5	Rohit Khattar	5	5	100	12	12	100
6	Sridar Arvamudhan Iyengar	5	5	100	13	13	100
7	Radhika Shastry	3	3	100	6	6	100
8	Sangeeta Talwar	1	1	100	0	0	0
9	Kavinder Singh	5	5	100	4	4	100

Note: The AGM of the Company is scheduled to be held on August 31, 2020.

X. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered: 1

Sr. No	Name	Designation	Gross Salary	Commission	Stock Option/Sweat Equity	Others	Total Amount
1	Kavinder Singh	Managing Director & CEO	46,467,391	0	0	0	46,467,391
Total			46,467,391	0	0	0	46,467,391

Number of CEO, CFO and Company Secretary whose remuneration details to be entered: 2

Sr. No.	Name	Designation	Gross Salary	Commission	Stock Option/Sweat Equity	Others	Total Amount
1	Akhila Balachandar	CFO	13,282,783	0	0	0	13,282,783
3	Dhanraj Narsappa Mulki	Company Secretary	7,209,527	0	0	0	7,209,527
Total			20,492,310	0	0	0	20,492,310

Number of other directors whose remuneration details to be entered: 8

Sr. No.	Name	Designation	Gross Salary	Commission #	Stock Option / Sweat Equity	Others (Sitting fees for Board and Committee meetings)	Total Amount
1	Arun Kumar Nanda	Director	0	5,000,000	0	680,000	5,680,000
2	Cyrus Jamshed Guzder	Director	0	1,650,000	0	640,000	2,290,000
3	Rohit Khattar	Director	0	1,600,000	0	740,000	2,340,000
4	Sanjeev Aga	Director	0	1,600,000	0	650,000	2,250,000
5	Sridar Arvamudhan Iyengar	Director	0	1,650,000		770,000	2,420,000
6	Radhika Shastry	Director	0	1,100,000		390,000	1,490,000
7	Sangeeta Talwar	Director		300,000		100,000	400,000
8	Parthasarathy Vankipuram Srinivasa	Director	0	0	0	0	0
			0	12,900,000	0	3,970,000	16,870,000

The Commission for the financial year ended March 31, 2020 will be paid to the Non-Executive Directors, subject to deduction of tax, after adoption of financial statements by the Members at the AGM to be held on August 31, 2020

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

- A. Whether the Company has made compliances and disclosure in respect of applicable provisions of the Companies Act, 2013 during the year: **YES**
- B. If No, give reasons/observations- **NA**

XII. PENALTY AND PUNISHMENT- DETAILS THEREOF

- A. DETAILS OF PENALTIES/ PUNISHMENT IMPOSED ON COMPANY/ DIRECTORS/OFFICERS: **NIL**
- B. DETAILS OF COMPOUNDING OF OFFENCES: **NIL**

XIII. WHETHER COMPLETE LIST OF SHAREHOLDERS, DEBENTURE HOLDERS HAS BEEN ENCLOSED AS AN ATTACHMENT:

The details are available with the Company and can be obtained by members upon request.

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

In case of a listed company or 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:

Form MGT-8 will be obtained from a Practicing Company Secretary for FY 2019-20.

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 his Return, the Company has complied with all the provisions of the Act during the financial year.
