

FORM NO. MGT-7

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



Annual Return (other than OPCs and Small Companies)

Form language ☒ English ☐ Hindi

Refer the instruction kit for filing the form.

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (CIN) of the company

U27310KA2008PTC046042

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AADCK3583C

(ii) (a) Name of the company

KHAYATI STEEL INDUSTRIES PF

(b) Registered office address

No D-33, 4th Main
V V Mohalla
Mysore
Mysore
Karnataka
570002

(c) *e-mail ID of the company

khayatisteel@yahoo.com

(d) *Telephone number with STD code

08214267440

(e) Website

www.apexmysore.com

(iii) Date of Incorporation

15/04/2008

(iv)	Type of the Company	Category of the Company	Sub-category of the Company
	Private Company	Company limited by shares	Indian Non-Government company

(v) Whether company is having share capital

☒ Yes

☐ No

(vi) *Whether shares listed on recognized Stock Exchange(s)

☐ Yes

☒ No

(vii) *Financial year From date (DD/MM/YYYY) To date (DD/MM/YYYY)

(viii) *Whether Annual general meeting (AGM) held ☒ Yes ☐ No

(a) If yes, date of AGM

(b) Due date of AGM

(c) Whether any extension for AGM granted ☐ Yes ☒ No

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*Number of business activities

S.No	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	C	Manufacturing	C7	Metal and metal products	100

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

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

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	13,822,100	13,822,100	13,822,100
Total amount of equity shares (in Rupees)	150,000,000	138,221,000	138,221,000	138,221,000

Number of classes

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity shares				
Number of equity shares	15,000,000	13,822,100	13,822,100	13,822,100

Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	150,000,000	138,221,000	138,221,000	138,221,000

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	0	0	0	0
Total amount of preference shares (in rupees)	0	0	0	0

Number of classes

0

Class of shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)				

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

(d) Break-up of paid-up share capital

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
Equity shares	Physical	DEMAT	Total			
At the beginning of the year	13,822,100	0	13822100	138,221,000	138,221,000	
Increase during the year	0	0	0	0	0	0
i. Public Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0

viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify <div></div>						
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 <div></div>						
At the end of the year	13,822,100	0	13822100	138,221,000	138,221,000	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify <div></div>						
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 <div></div>						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company

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

0

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

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

☒ Nil

[Details being provided in a CD/Digital Media]

☐ Yes ☐ No ☐ Not Applicable

Separate sheet attached for details of transfers

☐ Yes ☐ No

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

Date of the previous annual general meeting			
Date of registration of transfer (Date Month Year)			
Type of transfer		1 - Equity, 2 - Preference Shares, 3 - Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
Ledger Folio of Transferor			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			

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

Date of registration of transfer (Date Month Year)	<input type="text"/>
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Type of transfer	<input type="text"/>	1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock
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Number of Shares/ Debentures/ Units Transferred	<input type="text"/>	Amount per Share/ Debenture/Unit (in Rs.)	<input type="text"/>
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Ledger Folio of Transferor	<input type="text"/>
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Transferor's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

Ledger Folio of Transferee	<input type="text"/>
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Transferee's Name	<input type="text"/>	<input type="text"/>	<input type="text"/>
	Surname	middle name	first name

(iv) *Debentures (Outstanding as at the end of financial year)

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	0	0	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Total			0

Details of debentures

Class of debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

(v) Securities (other than shares and debentures)

0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

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

(i) Turnover

5,676,574,025

(ii) Net worth of the Company

1,613,860,607

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	7,260,000	52.52	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	0	0	0	
10.	Others	0	0	0	
	Total	7,260,000	52.52	0	0

Total number of shareholders (promoters)

2

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

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	6,562,100	47.48	0	
10.	Others	0	0	0	

	Total	6,562,100	47.48	0	0
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Total number of shareholders (other than promoters)

18

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

20

**VII. *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS
(Details, Promoters, Members (other than promoters), Debenture holders)**

Details	At the beginning of the year	At the end of the year
Promoters	2	2
Members (other than promoters)	18	18
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	0	2	0	2	0	52.52
B. Non-Promoter	0	1	0	1	0	0
(i) Non-Independent	0	1	0	1	0	0
(ii) Independent	0	0	0	0	0	0
C. Nominee Directors representing	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0
(v) Others	0	0	0	0	0	0
Total	0	3	0	3	0	52.52

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

4

(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)
NAVIN KUMAR GUPTA	02090777	Director	4,760,000	
ANITA GUPTA	02090800	Director	2,500,000	
SRINIVAS DAYAL	07021497	Director	0	
VASANTH KUMAR	BPSPK1536H	Company Secretar	0	

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

0

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)

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

2

Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	30/09/2022	20	2	52.52
Extra ordinary General Mee	20/01/2023	20	2	52.52

B. BOARD MEETINGS

*Number of meetings held

13

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	22/04/2022	3	3	100
2	21/06/2022	3	3	100
3	30/06/2022	3	3	100
4	18/08/2022	3	3	100

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
5	19/09/2022	3	3	100
6	20/09/2022	3	3	100
7	26/09/2022	3	3	100
8	16/11/2022	3	3	100
9	12/12/2022	3	3	100
10	29/12/2022	3	3	100
11	13/02/2023	3	3	100
12	28/02/2023	3	3	100

C. COMMITTEE MEETINGS

Number of meetings held

3

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	CSR committee	20/09/2022	3	3	100
2	CSR committee	12/12/2022	3	3	100
3	CSR committee	28/02/2023	3	3	100

D. *ATTENDANCE OF DIRECTORS

S. No.	Name of the director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	30/09/2023
								(Y/N/NA)
1	NAVIN KUMA	13	13	100	3	3	100	Yes
2	ANITA GUPTA	13	13	100	3	3	100	Yes
3	SRINIVAS DA	13	13	100	3	3	100	Not Applicable

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

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

0

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

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

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	VASANTH KUMAR	COMPANY SEC	508,200	0	0	0	508,200
	Total		508,200	0	0	0	508,200

Number of other directors whose remuneration details to be entered

1

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	SRINIVAS DAYAL	Director	600,000	0	0	0	600,000
	Total		600,000	0	0	0	600,000

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

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

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

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

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

(B) DETAILS OF COMPOUNDING OF OFFENCES ☒ Nil

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

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

☒ Yes ☐ No

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

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

Name

Vasuki Sheshadri

Whether associate or fellow

☐ Associate ☒ Fellow

Certificate of practice number

13381

I/We certify that:

(a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.

(b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.

(c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of the incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.

(d) Where the annual return discloses the fact that the number of members, (except in case of a one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

Declaration

I am Authorised by the Board of Directors of the company vide resolution no. ..

05

dated

25/09/2023

(DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

- 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.
- 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

NAVIN
KUMAR
GUPTA

Digitally signed by
NAVIN KUMAR
GUPTA
Date: 2024.04.06
18:51:28 +05'30'

DIN of the director

02090777

To be digitally signed by

VASANTH
KUMAR

Digitally signed by
VASANTH KUMAR
Date: 2024.04.06
18:55:14 +05'30'

- ☒ Company Secretary
☐ Company secretary in practice

Membership number

Certificate of practice number

Attachments

1. List of share holders, debenture holders
2. Approval letter for extension of AGM;
3. Copy of MGT-8;
4. Optional Attachement(s), if any

Attach

Attach

Attach

Attach

List of attachments

List of Shareholders.pdf
MGT 8.pdf

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

List of Shareholders as on March 31, 2023

Authorised Share Capital: Rs. 15, 00,00,000/- (1,50,00,000 Equity shares of Rs. 10/- each)

Issued, Subscribed and Paid up Capital: Rs.13,82,21,000/- (1,38,22,100 Equity Shares of Rs. 10/- each)

Folio Number	Shareholder Name	Equity/ Preference	No. Of Shares Held	Nominal Value
01	Navin Kumar Gupta	Equity	47,60,000	4,76,00,000
02	Anita Gupta	Equity	25,00,000	2,50,00,000
10	Ellenbarrie Commercial Ltd	Equity	13,800	1,38,000
30	Nirbhay Plastics Pvt Ltd	Equity	3,000	30,000
37	Venkatesh Barter Private Limited	Equity	20,000	2,00,000
46	Matajwala Investments And Infrastructure Private Limited	Equity	63,79,500	6,37,95,000
47	Arion Suppliers Private Limited	Equity	10,000	1,00,000
48	Aroma Barter Private Limited	Equity	10,000	1,00,000
49	Giriraj Housing Private Limited	Equity	7,500	75,000
50	Nector Business Solutions Private Limited	Equity	10,000	1,00,000
51	Nexus Barter Private Limited	Equity	15,000	1,50,000
52	Overall Realtors Private Limited	Equity	11,600	1,16,000
53	Suncity Niketan Private Limited	Equity	7,500	75,000
54	Swarnarekha Dealcom Private Limited	Equity	10,000	1,00,000
55	Zenom Vinimay Pvt.Ltd	Equity	3,500	35,000
56	Orchidtrixim Pvt Ltd	Equity	15,000	1,50,000
57	Nawalsons Holding Pvt Ltd	Equity	29,700	297,000
58	Dhanwanti Projects Private Limited	Equity	4,000	40,000
59	Eklavya Tradecom Private Limited	Equity	5,000	50,000
60	Complete Softech Private Limited	Equity	7,000	70,000

For and behalf of the Board of Directors

Navin Kumar Gupta

Navin Kumar Gupta
 Director
 DIN: 02090777

Khayati Steel Industries Private Limited

Gulzaar, No D-33, 4th Main, V V Mohalla,
 Mysore KA 570002

Tel : 0821 4088 888 . Fax : 0821 4088 899.

CIN : U27310KA2008PTC046042 . GST NO : 29AADCK3583C221

WORKS

12P-II/12P-III, Thandya Industrial
 Area, Thandavapura Nanjangud
 Taluk, Mysore District KA 571301.

UNIT 2

Plot No : 182-A, Vasanthanarasapura
 Industrial Area Phase 1, Survey Nos. 34 & 40,
 Nagenhalli Village Kora Hobbli, Tumakuru Taluk,
 Tumakuru District KA 572138.

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

I have examined the registers, records and books and papers of **KHAYATI STEEL INDUSTRIES PRIVATE LIMITED** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the Financial Year ended 31st March, 2023. In my opinion and to the best of my information and according to the examinations carried out by me and the information and explanations furnished to me 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 complied with provisions of the Act & Rules made there under in respect of followings subject to the reporting made hereunder:

1. its status under the Act;
2. as per the information and explanations provided to me for my verification the Company has maintained all the registers, records & as per the management representation obtained the company has made all the entries therein within the time prescribed therein;
3. as per the information and explanation provided to me for my verification the Company has duly filed the forms and returns with the Registrar of Companies and in the event of any delay in filing, the Company has paid necessary additional fees in this regard *except the company has not filed cost audit report in E form CRA 4 and E form CSR 2 for the Financial year 2022-23 till the date of the issuance of this certificate.* Further the Company was not required to file any forms or returns with Regional director, Central Government, Company Law Board or other authorities;
4. calling/convening/holding meetings of Board of Directors or its Committees and the meetings of the members of the Company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings have been properly recorded in the Minute books/registers maintained for the purpose and the same have been signed;

5. the Company being a private limited company during the year, was not required to close its Register of Members.
6. As per the information and explanation provided to me for my verification the company has not advanced any loans in the nature of loans to its directors or persons or firms or companies referred in section 185 of the;
7. The Company has entered into contracts/arrangements with related parties and as per the information, documents and explanation provided to me for my verification the Company has complied with provisions of section 188 of the Act;
8. The Company has not issued or allotted or bought back any shares or security or there was no transfer of shares or other securities during the financial year and hence the Company was not required to issue any share certificate or security certificates as such;
9. The Company has not declared any dividend during the financial year hence reporting under this clause is not applicable for the Company.
10. As per the information and explanations provided to me for my verification the Company was not required to transfer any amount to Investor Education Protection Fund as there was no amount pending in the unpaid dividend account;
11. The Company has complied with the provisions of section 134 of the Act with regard to signing of audited financial statement and report of directors and it is as per sub - sections (3), (4) and (5) thereof;
12. The Board of Directors of the Company is duly constituted and there was no change in the board of directors during the year. There were no re-appointment/ retirement /filling up of casual vacancies during the year and the company has paid remuneration to its director amounting to Rs 6,00,000/-during the financial year;
13. The Company has appointed the Statutory auditors of the company and has complied with the provisions of section 139 of the Act;
14. As per the information and explanations provided to me for my verification the Company was not required to obtain any approvals from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;

15. As per the information and explanations provided to me for my verification the Company has not accepted any deposits for which the provisions of Sections 73 to 76 or any other relevant provisions of the Act and the rules framed thereunder are applicable;
16. As per the information and explanations provided to me for my verification the company was generally regular in filing the documents required for Creation modification/ satisfaction of charges in respect of loans borrowed from bank and other financial institutions.
17. As per the information and explanations provided to me for my verification the Company has not granted any loans and but has made investments in the equity shares of an a company (as per annexure 1) and other company and has complied with the provisions of section 186 of the Companies Act 2013, or has not given any guarantee or not provided any securities to other bodies corporate or persons falling under the provisions of section 186 of the Act during the financial year;
18. The Company has not altered the provisions of the Memorandum of Association and the Articles of Association during the Financial Year.



(Vasuki S)

Company Secretary in practice
M No 10230
C.P. No: 13381
PR: 5474/2024
UDIN: **F010230F000035090**

Place: Mysuru
Date: 05.04.2024

ANNEXURE 1

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS UNDER SECTION 186:

The Company has not given any loans, guarantees, but has made investments in securities and complied with the provisions of section 186 of the Companies Act, 2013 during the Financial Year 2022-23. The Details of Investment is as follows:

Particulars of Investment made	Amount in Lakhs
Investment in Equity shares of Atria Wind Power (Basavana Bagewadi) Private Limited [26000 equity shares of Rs 100 Each & 6,01,474 shares of Rs 193.29 (Face value Rs.100+Rs 93.29 Premium)]	1188.59
Investment in Equity shares of Atria Wind Power (Chitradurga) Private Limited (15 Equity shares of Rs 100 Each)	0.02
Investment in Equity shares of Atria Wind Power (Bijapur - 1) Private Limited [11898 Equity shares of Rs 100 Each & 1,97,025 shares of Rs 221.48]	448.27
O2 Renewable Energy Private Limited [Equity shares: 14,80,000 shares of Rs 10 each]	148.00
O2 Renewable Energy Private Limited [CCD 1,33,200@ Rs 1000 each]	1332.00
Total Investment made	3116.88

These investments are made for supply of renewable wind power at a lower cost and in compliance with the provisions of CERC ACT for gross captive consumption and avoidance of cross subsidy levy on the units purchased.

ANNEXURE 2

To
Khayati Steel Industries Private Limited
Mysore

My certificate in form MGT 8 on the Annual return (MGT 7) as on Financial Year ended on March 31, 2023, of even date is to be read with this letter / Annexure:

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my verification.
2. I have followed the verification practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in the form MGT 7. I believe that the process and practices, I followed provide a reasonable basis for my opinion.
3. The compliance of the provisions of the Companies Act, 2013, rules, regulations, standards is the responsibility of the Management. My examination was limited to the verification of records on test basis.
4. The certificate is issued based on the verification of secretarial records furnished by / obtained from the company and also the information provided by the company electronically.



(Vasuki S)

Company Secretary in practice
M No 10230
C.P. No: 13381
PR: 5474/2024
UDIN: **F010230F000035090**

Place: Mysuru
Date: 05.04.2024