

# ANNEXURE E

## Form No. MGT - 9

### EXTRACT OF ANNUAL RETURN

As on the financial year ended on 31<sup>st</sup> March, 2020

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

#### I. REGISTRATION AND OTHER DETAILS:

(i)	CIN	L26100GJ1907000033
(ii)	Registration Date	30/07/1907
(iii)	Name of the Company	Alembic Limited
(iv)	Category/Sub-Category of the Company	Company Limited by Shares
(v)	Address of the Registered Office and Contact Details	Alembic Road, Vadodara - 390 003. Tel: +91 265 2280550 Fax: +91 265 2282506 Website: www.alembiclimited.com Email Id: alembic.investors@alembic.co.in
(vi)	Whether listed company	Yes
(vii)	Name, Address and Contact Details of Registrar and Share Transfer Agent, if any:	Link Intime India Pvt. Limited B - 102 & 103 Shangrila Complex, First Floor, Opp. HDFC Bank, Near Radhakrishna Char Rasta, Akota, Vadodara - 390 020. Tel: +91 265 2356573   6136000 Email Id: vadodara@linkintime.co.in

#### II. PRINCIPAL BUSINESS ACTIVITY OF THE COMPANY:

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

Sl. No.	Name and Description of main products/ services	NIC Code of the Product/ Service	% to total turnover of the company
(i)	API	210*	69.33
(ii)	Real Estate	681*	30.67

\* As per National Industrial Classification (NIC) 2008

#### III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES:

S. No	Name and Address of the Company	CIN/GLN	Holding / Subsidiary / Associate	% of shares held	Applicable Section
(i)	Nirayu Limited C4/22-23, Baroda Industrial Estate, Gorwa, Vadodara - 390 016	U28100GJ1971PLC098778	Holding	59.80	2(46)
(ii)	Alembic City Limited Alembic Road, Vadodara – 390 003	U70100GJ1994PLC021552	Subsidiary	100.00	2(87)(ii)
(iii)	Alembic Pharmaceuticals Limited Alembic Road, Vadodara – 390 003	L24230GJ2010PLC061123	Associate	29.47	2(6)

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### IV. SHAREHOLDING PATTERN (Equity share Capital Break up as percentage of Total Equity):

#### (i) Category-wise Share Holding:

Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% change during the year
	Demat	Physical	Total	% of total Shares	Demat	Physical	Total	% of total Shares	
<b>A. Promoters</b>									
<b>(1) Indian</b>									
a) Individual/HUF	1,81,64,285	-	7.07	7.07	2,00,91,500	-	2,00,91,500	7.82	0.75
b) Central Govt.	-	-	-	-	-	-	-	-	-
c) State Govt. (s)	-	-	-	-	-	-	-	-	-
d) Bodies Corp.	14,32,19,535	-	55.77	55.77	15,35,51,103	-	15,35,51,103	59.80	4.03
e) Banks/FI	-	-	-	-	-	-	-	-	-
f) Any Other:									
i) Trust	24,86,244	-	24,86,244	0.97	800	-	800	-	(0.97)
ii) LLP	1,800	-	1,800	-*	1,800	-	1,800	-*	-
<b>Sub-total (A)(1):-</b>	<b>16,38,71,864</b>	<b>-</b>	<b>16,38,71,864</b>	<b>63.82</b>	<b>17,36,45,203</b>	<b>-</b>	<b>17,36,45,203</b>	<b>67.62</b>	<b>3.81</b>
<b>(2) Foreign</b>									
NRIs, Bodies Corporate, Banks, FIs, others	19,27,015	-	19,27,015	0.75	-	-	-	-	(0.75)
<b>Sub-total (A) (2):-</b>	<b>19,27,015</b>	<b>-</b>	<b>19,27,015</b>	<b>0.75</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>(0.75)</b>
<b>Total Shareholding of Promoter (A) = (A) (1)+(A)(2)</b>	<b>16,57,98,879</b>	<b>-</b>	<b>16,57,98,879</b>	<b>64.57</b>	<b>17,36,45,203</b>	<b>-</b>	<b>17,36,45,203</b>	<b>67.62</b>	<b>3.05</b>
<b>B. Public</b>									
<b>Shareholding</b>									
<b>I. Institutions</b>									
a) Mutual Funds	1,46,05,408	-	1,46,05,408	5.69	1,49,86,052	-	1,49,86,052	5.84	0.15
b) Banks/FI	2,89,645	17,450	3,07,095	0.12	2,34,610	17,450	2,52,060	0.10	(0.02)
c) Central Govt.	-	-	-	-	-	-	-	-	-
d) State Govt.	-	-	-	-	-	-	-	-	-
e) Venture Capital Funds	-	-	-	-	-	-	-	-	-
f) Insurance Companies	-	-	-	-	-	-	-	-	-
g) FIs / FPI	26,76,542	-	26,76,542	1.04	46,33,445	-	46,33,445	1.80	0.76
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others:									
i) Foreign Bank	6,500	-	6,500	-*	6,500	-	6,500	-*	-
<b>Sub-total (B) (1):-</b>	<b>1,75,78,095</b>	<b>17,450</b>	<b>1,75,95,545</b>	<b>6.85</b>	<b>1,98,60,607</b>	<b>17,450</b>	<b>1,98,78,057</b>	<b>7.74</b>	<b>0.89</b>
<b>2. Non-Institutions</b>									
<b>a) Bodies Corp.</b>									
(i) Indian	35,02,218	18,600	35,20,818	1.37	22,57,760	18,600	22,76,360	0.89	(0.48)
(ii) Overseas	-	-	-	-	-	-	-	-	-

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Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% change during the year
	Demat	Physical	Total	% of total Shares	Demat	Physical	Total	% of total Shares	
<b>b) Individuals</b>									
(i) Individual Shareholders holding nominal share capital upto ₹ 1 lakh	4,39,33,751	43,26,341	4,82,60,092	18.79	3,63,71,377	39,36,311	4,03,07,688	15.70	(3.09)
(ii) Individual shareholders holding nominal share capital in excess of ₹ 1 Lakh	1,40,06,485	1,40,100	1,41,46,585	5.51	1,43,88,557	1,40,100	1,45,28,657	5.66	0.15
<b>c) NBFCs registered with RBI</b>	1,11,312	-	1,11,312	0.04	36,500	-	36,500	0.01	(0.03)
<b>d) Others (specify)</b>									
(i) Unclaimed Shares	8,06,251	-	8,06,251	0.31	8,01,301	-	8,01,301	0.31	-*
(ii) Clearing Member	5,38,501	-	5,38,501	0.21	1,97,966	-	1,97,966	0.08	(0.13)
(iii) Non Resident Indians (NRI)- Repat	7,40,129	-	7,40,129	0.29	5,14,414	-	7,40,129	0.20	(0.09)
(iv) Non Resident Indians (NRI)- Non- Repat	8,27,154	2,550	8,29,704	0.32	7,00,113	2,550	7,02,663	0.27	(0.05)
(v) Trusts	1,86,910	-	1,86,910	0.07	1,86,910	-	1,86,910	0.07	-
(vi) Foreign Nationals	-	-	-	-	-	-	-	-	-
(vii) HUF	24,54,188	-	24,54,188	0.96	19,13,495	-	19,13,495	0.75	(0.21)
(viii) IEPF	17,92,914	-	17,92,914	0.70	17,92,614	-	17,92,614	0.70	-*
<b>Sub-total (B)(2):-</b>	<b>6,88,99,813</b>	<b>44,87,591</b>	<b>7,33,87,404</b>	<b>28.58</b>	<b>5,91,61,007</b>	<b>40,97,561</b>	<b>6,32,58,568</b>	<b>24.64</b>	<b>(3.94)</b>
<b>Total Public Shareholding (B)=(B)(1)+(B)(2)</b>	<b>8,64,77,908</b>	<b>45,05,041</b>	<b>9,09,82,949</b>	<b>35.43</b>	<b>7,90,21,614</b>	<b>41,15,011</b>	<b>8,31,36,625</b>	<b>32.38</b>	<b>(3.05)</b>
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>	-	-	-	-	-	-	-	-	-
<b>Grand Total (A+B+C)</b>	<b>25,22,76,787</b>	<b>45,05,041</b>	<b>25,67,81,828</b>	<b>100.00</b>	<b>25,26,66,817</b>	<b>41,15,011</b>	<b>25,67,81,828</b>	<b>100.00</b>	<b>-</b>

\* Less than 0.005%.

### (ii) Shareholding of Promoters:

#### Details of Shareholding of Promoters:

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total shares of the company	% shares pledged/encumbered to total shares	No. of Shares	% of total shares of the company	% shares pledged/encumbered to total shares	
1.	Mr. Chirayu Amin <sup>1</sup>	83,17,644	3.24	-	83,17,644	3.24	-	-
2.	Mrs. Malika Amin <sup>2</sup>	57,51,939	2.24	-	76,78,954	2.99	-	0.75
3.	Mr. Udit Amin <sup>2</sup>	19,27,015	0.75	-	-	-	-	(0.75)

<sup>1</sup> 20,53,833 Equity Shares held in the name of Chirayu Amin in representative capacity of Karta of Chirayu Ramanbhai Amin HUF.

<sup>2</sup> Mrs. Malika Chirayu Amin received shares from his son, Mr. Udit Chirayu Amin, by way of Interse Promoter transfer (gift), without consideration, through off market transaction.

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### Details of Shareholding of persons and entities of promoter group:

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% change in shareholding during the year
		No. of Shares	% of total shares of the company	% shares pledged/ encumbered to total shares	No. of Shares	% of total shares of the company	% shares pledged / encumbered to total shares	
1.	Nirayu Limited <sup>1</sup>	10,80,66,469	42.08	-	15,35,49,378	59.80	-	17.72
2.	Shreno Limited <sup>1</sup>	3,51,51,541	13.69	-	100	0.00	-	(13.69)
3.	Paushak Limited	1,525	0.00	-	1,525	0.00	-	-
4.	Alembic Pharmaceuticals Limited <sup>2</sup>	-	-	-	-	-	-	-
5.	Alembic City Limited <sup>2</sup>	-	-	-	-	-	-	-
6.	Shreno Publications Limited	-	-	-	100	0.00	-	-
7.	Mr. Pranav Amin	19,32,411	0.75	-	19,32,411	0.75	-	-
8.	Mr. Shaunak Amin	19,32,651	0.75	-	19,32,651	0.75	-	-
9.	Ms. Samira Pranav Amin	57,410	0.02	-	57,410	0.02	-	-
10.	Mr. Ranvir Pranav Amin	57,410	0.02	-	57,410	0.02	-	-
11.	Ms. Inaaya Shaunak Amin	57,410	0.02	-	57,410	0.02	-	-
12.	Ms. Naintara Shaunak Amin	57,410	0.02	-	57,410	0.02	-	-
13.	Mrs. Barkha Pranav Amin	-	-	-	100	0.00	-	-
14.	Mrs. Krupa Shaunak Amin	-	-	-	100	0.00	-	-
15.	Mrs. Tishya Udit Amin <sup>2</sup>	-	-	-	-	-	-	-
16.	Vidyanidhi Trust <sup>3</sup>	15,49,202	0.60	-	-	-	-	(0.60)
17.	Arogyavardhini Society <sup>3</sup>	5,37,643	0.21	-	-	-	-	(0.21)
18.	Utkarsh Vidyakendra <sup>3</sup>	2,79,873	0.11	-	-	-	-	(0.11)
19.	Ujjwal Vidyalaya <sup>3</sup>	1,19,126	0.05	-	-	-	-	(0.05)
20.	Laburnum Family Trust <sup>4</sup>	200	0.00	-	200	0.00	-	-
21.	Virsad Family Trust <sup>4</sup>	200	0.00	-	200	0.00	-	-
22.	Uday Education Society <sup>2</sup>	-	-	-	-	-	-	-
23.	Bhailal Amin General Hospital <sup>2</sup>	-	-	-	-	-	-	-
24.	Laksh Trust <sup>4</sup>	-	-	-	100	0.00	-	-
25.	Gallup Trust <sup>4</sup>	-	-	-	100	0.00	-	-
26.	Grace Star Trust <sup>4</sup>	-	-	-	100	0.00	-	-
27.	Satori Trust <sup>4</sup>	-	-	-	100	0.00	-	-
28.	Viramya Packlight LLP	1,800	0.00	-	1,800	0.00	-	-

<sup>1</sup> Pursuant to the Order passed by the Hon'ble National Company Law Tribunal, Ahmedabad Bench dated 26<sup>th</sup> July, 2019 in the matter of Composite Scheme of Arrangement between Alembic Limited, Shreno Limited and Nirayu Private Limited, the equity shares held by Shreno Limited in the Company are transferred to Nirayu Private Limited. Further, Nirayu Private Limited has been converted into a Public Limited company and its name has been changed to Nirayu Limited pursuant to the Certificate of Incorporation dated 3<sup>rd</sup> October, 2019 issued by the Registrar of Companies, Gujarat in this regard. Subsequently, Shreno Limited acquired 100 equity shares of the Company from the open market.

<sup>2</sup> As per the disclosures under the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011, furnished by the Promoters.

<sup>3</sup> Transfer of equity shares of the Company by and between the members of Promoter Group by way of donation, without consideration, through off market transaction.

<sup>4</sup> Equity shares held in the name of the Trustees on behalf of the trust.

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

Particulars		Shareholding at the beginning of the year		Cumulative shareholding during the year	
		No. of Shares	% of total shares of the Company	No. of Shares	% of total shares of the Company
At the beginning of the year		16,57,98,879	64.57	16,57,98,879	64.57
Transfer by Vidyanidhi Trust <sup>1</sup>	03.04.2019	(15,49,202)	(0.60)	16,42,49,677	63.96
Transfer by Utkarsh Vidyakendra <sup>1</sup>	03.04.2019	(2,79,873)	(0.11)	16,39,69,804	63.86
Transfer by Ujjwal Vidyalaya <sup>1</sup>	03.04.2019	(1,19,126)	(0.05)	16,38,50,678	63.81
Transfer by Arogyavardhini Society <sup>1</sup>	03.04.2019	(5,37,643)	(0.21)	16,33,13,035	63.60
Acquired / Received by Uday Education Society <sup>1</sup>	03.04.2019	19,48,201	0.76	16,52,61,236	64.36
Acquired / Received by Bhailal Amin General Hospital <sup>1</sup>	03.04.2019	5,37,643	0.21	16,57,98,879	64.57
Market Sale by Uday Education Society	17.06.2019	(19,48,201)	(0.76)	16,38,50,678	63.81
Market Sale by Bhailal Amin General Hospital	17.06.2019	(5,37,643)	(0.21)	16,33,13,035	63.60
Transfer by Shreno Limited <sup>2</sup>	26.07.2019	(3,51,51,541)	(13.69)	12,81,61,494	49.91
Acquired/Received by Nirayu Limited <sup>2</sup>	26.07.2019	3,51,51,541	13.69	16,33,13,035	63.60
Transfer by Mr. Udit Amin <sup>3</sup>	14.08.2019	(19,27,015)	(0.75)	16,13,86,020	62.85
Acquired/Received by Mrs. Malika Amin <sup>3</sup>	14.08.2019	19,27,015	0.75	16,33,13,035	63.60
Market Purchase by Shreno Publications Limited	25.09.2019	100	0.00	16,33,13,135	63.60
Market Purchase by Laksh Trust	25.09.2019	100	0.00	16,33,13,235	63.60
Market Purchase by Gallup Trust	25.09.2019	100	0.00	16,33,13,335	63.60
Market Purchase by Grace Star Trust	25.09.2019	100	0.00	16,33,13,435	63.60
Market Purchase by Satori Trust	25.09.2019	100	0.00	16,33,13,535	63.60
Market Purchase by Shreno Limited	24.12.2019	100	0.00	16,33,13,635	63.60
Market Purchase by Mrs. Barkha Pranav Amin	24.12.2019	100	0.00	16,33,13,735	63.60
Market Purchase by Mrs. Krupa Shaunak Amin	24.12.2019	100	0.00	16,33,13,835	63.60
Market Purchase by Nirayu Limited during the year	During the year <sup>4</sup>	1,03,31,368	4.02	17,36,45,203	67.62
At the end of the year		17,36,45,203	67.62	17,36,45,203	67.62

<sup>1</sup> Transfer of equity shares of the Company by and between the members of Promoter Group by way of donation, without consideration, through off market transaction.

<sup>2</sup> Share transferred to Nirayu Limited pursuant to the Order dated 26<sup>th</sup> July, 2019 passed by the Hon'ble National Company Law Tribunal, Ahmedabad Bench in the matter of Composite Scheme of Arrangement between Alembic Limited, Shreno Limited and Nirayu Private Limited.

<sup>3</sup> Mrs. Malika Chirayu Amin received shares from his son, Mr. Udit Chirayu Amin, by way of Interse Promoter transfer (gift), without consideration, through off market transaction.

<sup>4</sup> The date wise increase/decrease in shareholding of Nirayu Limited is available on the website of the Company.

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**(iv) Shareholding Pattern of Top Ten Shareholders (other than Directors, Promoters, Promoter Group and Holders of GDRs and ADRs):**

SI No.	Name	Shareholding at the beginning (01.04.2019)		Date	Increase/ Decrease in shareholding	Reason	Cumulative Shareholding during the year	
		No. of Shares	% of total shares of the Company				No. of Shares	% of total shares of the Company
1	SBI Small Cap Fund	1,46,05,408	5.69	During the financial year	3,80,644	Increase	1,49,86,052	5.84
					-	Decrease		
2	Ms. Yera Amin	14,94,404	0.58	During the financial year	-	Increase	14,94,404	0.58
					-	Decrease		
3	Mrs. Shreya Mukherji	13,04,569	0.51	During the financial year	-	Increase	13,04,569	0.51
					-	Decrease		
4	Elara India Opportunities Fund Limited	-	-	During the financial year	17,53,798	Increase	12,42,192	0.48
					(5,11,606)	Decrease		
5	Mrs. Jyoti Suresh Patel	9,68,897	0.38	During the financial year	-	Increase	9,68,897	0.38
					-	Decrease		
6	Emerging Markets Core Equity Portfolio (The Portfolio) of DFA Investment Dimensions Group Inc. (DFAIDG)	10,03,056	0.39	During the financial year	-	Increase	8,98,422	0.35
					(1,04,634)	Decrease		
7	Mr. Utkarsh Kothari	8,62,365	0.34	During the financial year	-	Increase	8,62,365	0.34
					-	Decrease		
8	Mrs. Ninochaka A Kothari	7,53,916	0.29	During the financial year	-	Increase	7,53,916	0.29
					-	Decrease		
9	The Emerging Markets Small Cap Series Of The DFA Investment Trust Company	6,25,263	0.24	During the financial year	21,202	Increase	6,18,680	0.24
					(27,785)	Decrease		
10	Mr. Mohan Kapoorchand Jain	5,49,058	0.21	During the financial year	-	Increase	5,39,985	0.21
					(9,073)	Decrease		

<sup>1</sup> The date wise increase/decrease in shareholding of the top ten shareholders is available on the website of the Company.

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

Sr. No.	For each of the Directors and KMP	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of Shares	% of total shares of the company	No. of Shares	% of total shares of the company
	At the beginning/ end of the year				
1.	Mr. Chirayu Amin, Chairman <sup>1</sup>	83,17,644	3.24	83,17,644	3.24
2.	Mrs. Malika Amin, Managing Director & CEO <sup>2</sup>	57,51,939	2.24	76,78,954	2.99
3.	Mr. Udit Amin, Director <sup>2</sup>	19,27,015	0.75	-	-
4.	Mr. Sameer Khera, Independent Director	2,000	0.00	-	-
5.	Mr. Mayank Amin, Independent Director <sup>3</sup>	-	-	18,000	0.00
6.	Mr. Rasesh Shah, CFO (jointly with immediate relative)	-	-	10	0.00

<sup>1</sup> 20,53,833 Equity Shares held in the name of Chirayu Amin in representative capacity of Karta of Chirayu Ramanbhai Amin HUF at the beginning of the year and at the end of the financial year 2019-20.

<sup>2</sup> Mr. Udit Amin transferred the equity shares of Alembic Limited held by him to his mother, Mrs. Malika Chirayu Amin, by way of Interse Promoter transfer (gift), without consideration, through off market transaction.

<sup>3</sup> Mr. Mayank Amin was appointed as an Independent Director of the Company w.e.f. 15<sup>th</sup> May, 2019.

Mr. Abhijit Joshi, Non-Executive Professional Director and Mr. Drigesh Mittal, Company Secretary of the Company do not hold any shares in the Company. None of the Independent Directors except Mr. Mayank Amin hold any shares in the Company.

**V. INDEBTEDNESS:**

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

**VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:**

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

(₹ in Lacs)

Sl. No.	Particulars of Remuneration	Name of MD	
		Mrs. Malika Amin	
1.	Gross Salary (a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961 (b) Value of Perquisites u/s 17(2) Income Tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income Tax Act, 1961	131.30	0.40
2.	Stock Option	-	-
3.	Sweat Equity	-	-
4.	Commission - as % of profit	-	-
5.	Others (Retiral Benefits)	12.03	-
	<b>Total (A)</b>	<b>143.73</b>	
	Ceiling as per the Act	1,038.77	

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### B. Remuneration to other Directors:

(₹ in Lacs)

Sl. No.	Particulars of Remuneration	Name of Directors								Total Amount
		Mr. C. P. Buch	Mr. Sameer Khera	Mr. R. C. Saxena	Mr. Mayank Amin	Mrs. Rati Desai	Mr. Chirayu Amin	Mr. Udit Amin	Mr. Abhijit Joshi	
1.	Independent Directors - Fee for attending board/committee - Commission - Others, Please specify	3.40	2.55	0.75	2.30	0.80	-	-	-	9.80
	<b>Total (1)</b>	<b>3.40</b>	<b>2.55</b>	<b>0.75</b>	<b>2.30</b>	<b>0.80</b>	-	-	-	<b>9.80</b>
2.	Other Non-Executive Directors - Fee for attending board/committee - Commission - Others, Please specify						1.30	1.90	1.50	4.70
	<b>Total (2)</b>						<b>1.30</b>	<b>126.90</b>	<b>1.50</b>	<b>129.70</b>
	<b>Total Managerial Remuneration (1+2)</b>	<b>3.40</b>	<b>2.55</b>	<b>0.75</b>	<b>2.30</b>	<b>0.80</b>	<b>1.30</b>	<b>126.90</b>	<b>1.50</b>	<b>139.50</b>
	Overall Ceiling as per the Act									1,038.77

<sup>1</sup> Mr. Udit Amin, Non-Executive Director, has been paid commission of ₹125.00 Lacs for the financial year 2019-20 which is within the limit approved by the members of the company at the 111<sup>th</sup> Annual General Meeting of the Company held on 7<sup>th</sup> August, 2018. Further, the same is subject to approval of the members at the Annual General Meeting for the financial year 2019-20.

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

(₹ in Lacs)

Sl. No.	Particulars of Remuneration	Key Managerial Personnel			
		Mrs. Malika Amin CEO	Mr. Drigesh Mittal Company Secretary	Mr. Rasesh Shah CFO	Total
1.	Gross Salary (a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961 (b) Value of Perquisites u/s 17(2) Income Tax Act, 1961 (c) Profits in lieu of salary under section 17(3) Income Tax Act, 1961	Covered at point VI – A above	12.70	60.12	72.82
2.	Stock Option	-	-	-	-
3.	Sweat Equity	-	-	-	-
4.	Commission - as % of profit	-	-	-	-
5.	Others - Retiral Benefits - Withdrawal of Accrued benefits	-	1.47	4.36	5.83
	<b>Total</b>	-	<b>14.17</b>	<b>68.57</b>	<b>82.31</b>

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

There has been no penalty or punishment or compounding of offences against/by the Company, Directors and Other Officers in default under the provisions of the Companies Act, 2013 during the financial year 2019-20.

For and on behalf of the Board of Directors,

Sd/-  
**Chirayu Amin**  
Chairman  
(DIN: 00242549)

Date: 25<sup>th</sup> May, 2020  
Place: Vadodara