Form No. MGT-7

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



Form language

(•) English ( ) Hindi

*All fields marked in * are mandatory*

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN) U40106PB2022PLC055755

ii (a) *Financial year for which the annual return is being filed (From date) (DD/MM/YYYY) 01/04/2024

(b) *Financial year for which the annual return is being filed (To date) (DD/MM/YYYY) 31/03/2025

(c) *Type of Annual filing (•) Original ( ) Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

Particulars	As on filing date	As on the financial year end date
Name of the company	SAEL INDUSTRIES LIMITED	SAEL INDUSTRIES LIMITED
Registered office address	H. No. 44, Model Town,,NA,Guruharsahai,Firozpur,Punjab,India,15 2022	H. No. 44, Model Town,,NA,Guruharsahai,Firozpur,Punjab,India,15 2022
Latitude details	30.707011	30.707011
Longitude details	74.403385	74.403385

(a) *Photograph of the registered office of the Company showing external building and name prominently visible Registered Office Photo.pdf

(b) *Permanent Account Number (PAN) of the company AB******8D

(c) *e-mail ID of the company *****iance@sael.co

(d) *Telephone number with STD code 01*******11

(e) Website

iv *Date of Incorporation (DD/MM/YYYY) 25/04/2022

v (a) *Class of Company (as on the financial year end date) Public company
(Private company/Public Company/One Person Company)

(b) *Category of the Company (as on the financial year end date) Company limited by shares
(Company limited by shares/Company limited by guarantee/Unlimited company)

(c) *Sub-category of the Company (as on the financial year end date) Indian Non-Government company
(Indian Non-Government company/Union Government Company/State Government Company/ Guarantee and association company/Subsidiary of Foreign Company)

vi *Whether company is having share capital (as on the financial year end date) (●) Yes ( ) No

vii (a) Whether shares listed on recognized Stock Exchange(s) ( ) Yes (●) No

(b) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code

viii Number of Registrar and Transfer Agent 1

CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent
U99999MH1994PTC076534	BIGSHARE SERVICES PRIVATE LIMITED	Pinnacle Business Park, Office no S6-2 ,6th floor,, Mahakali Caves Road , Next to Ahura Centre, Andheri East,Mumbai,Mumbai,Maharashtra,India,400093	

ix * (a) Whether Annual General Meeting (AGM) held (●) Yes ( ) No

(b) If yes, date of AGM (DD/MM/YYYY) 19/06/2025

(c) Due date of AGM (DD/MM/YYYY) 30/09/2025

(d) Whether any extension for AGM granted ( ) Yes (●) No

(e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *Number of business activities: 1

S. No.	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	D	Electricity, gas, steam and air condition supply	35	Electric power generation, transmission and distribution	100

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

i *No. of Companies for which information is to be given: 38

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Joint Venture	% of shares held
1	U40101PB1999PLC023197		SAEL LIMITED	Subsidiary	100
2	U40108PB2022PTC055361		SAEL RE POWER PRIVATE LIMITED	Subsidiary	100
3	U31909PB2022PTC055360		SAEL SOLAR MFG.PRIVATE LIMITED	Subsidiary	100
4	U40106PB2022PTC055363		SAEL SOLAR SOLUTIONS PRIVATE LIMITED	Subsidiary	100
5	U40107PB2022PTC055137		SARDARSHAHAR AGRI ENERGY PRIVATE LIMITED	Subsidiary	100
6	U40107DL2018PTC337346		SUNFREE ENERGY PRIVATE LIMITED	Subsidiary	100

7	U40106PB2020PTC051164		SUNFREE NORTH EAST RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
8	U40106PB2020PTC051175		SUNFREE PASCHIM RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
9	U40100DL2020PTC375171		TNA RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
10	U40300PB2017PTC045990		CANAL SOLAR ENERGY PRIVATE LIMITED	Subsidiary	100
11	U40100PB2005PTC028850		UNIVERSAL BIOMASS ENERGY PRIVATE LIMITED.	Subsidiary	100
12	U40106PB2020PTC051884		VCA POWER PRIVATE LIMITED	Subsidiary	100
13	U40200PB2022PTC055150		CHATTARGARH RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
14	U40100PB2022PTC055138		JASRASAR GREEN POWER ENERGY PRIVATE LIMITED	Subsidiary	100
15	U40100DL2020PTC374837		KTA POWERS PRIVATE LIMITED	Subsidiary	100
16	U40300PB2016PTC045339		LAXJEET RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
17	U74999PB2020PTC051112		NATIVE POWER PRIVATE LIMITED	Subsidiary	100
18	U29300PB2021PTC053089		SAEL ENGINEERING PRIVATE LIMITED	Subsidiary	100
19	U40107PB2021PTC053197		SAEL KAITHAL RENEWABLE ENERGY PRIVATE LIMITED	Subsidiary	100
20	U35105PB2023PTC058750		SAEL SOLAR MHP1 PRIVATE LIMITED	Subsidiary	100
21	U35105PB2023PTC058772		SAEL SOLAR MHP2 PRIVATE LIMITED	Subsidiary	100
22	U35105PB2023PTC059266		SAEL SOLAR P4 PRIVATE LIMITED	Subsidiary	100
23	U35105PB2023PTC059270		SAEL SOLAR P5 PRIVATE LIMITED	Subsidiary	100
24	U35105PB2023PTC059269		SAEL SOLAR P6 PRIVATE LIMITED	Subsidiary	100

25	U35105PB2023PTC059379		SAEL SOLAR P7 PRIVATE LIMITED	Subsidiary	100
26	U35105PB2023PTC059384		SAEL SOLAR P8 PRIVATE LIMITED	Subsidiary	100
27	U35105PB2023PTC059378		SAEL SOLAR P9 PRIVATE LIMITED	Subsidiary	100
28	U35105PB2023PTC059394		SAEL SOLAR P10 PRIVATE LIMITED	Subsidiary	100
29	U35105PB2023PTC058922		SUNFREE ENERGY RJP1 PRIVATE LIMITED	Subsidiary	100
30	U35105DL2024PTC434952		SAEL SOLAR P11 PRIVATE LIMITED	Subsidiary	100
31	U35105DL2024PTC434951		SAEL SOLAR P12 PRIVATE LIMITED	Subsidiary	100
32	U35105DL2024PTC435104		SAEL SOLAR P14 PRIVATE LIMITED	Subsidiary	100
33	U35105DL2024PTC434686		SAEL SOLAR P15 PRIVATE LIMITED	Subsidiary	100
34	U35105DL2025PTC440895		SAEL SOLAR P SIXTEEN PRIVATE LIMITED	Subsidiary	100
35	U35105DL2025PTC441302		SAEL SOLAR P SEVENTEEN PRIVATE LIMITED	Subsidiary	100
36	U35105DL2025PTC444629		SAEL SOLAR P EIGHTEEN PRIVATE LIMITED	Subsidiary	100
37	U35105DL2025PTC444582		SAEL SOLAR P NINETEEN PRIVATE LIMITED	Subsidiary	100
38	U35105DL2025PTC444713		SAEL SOLAR P TWENTY PRIVATE LIMITED	Subsidiary	100

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	66000000.00	49354297.00	49354297.00	49354297.00
Total amount of equity shares (in rupees)	660000000.00	493542970.00	493542970.00	493542970.00

Number of classes 1

Class of shares Equity	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	66000000	49354297	49354297	49354297
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	660000000.00	493542970.00	493542970	493542970

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	31140000.00	30098548.00	30098548.00	30098548.00
Total amount of preference shares (in rupees)	311400000.00	300985480.00	300985480.00	300985480.00

Number of classes 1

Class of shares Preference	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of preference shares	31140000	30098548	30098548	30098548
Nominal value per share (in rupees)	10	10	10	10
Total amount of preference shares (in rupees)	311400000.00	300985480.00	300985480	300985480

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

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

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
(i) Equity shares						
At the beginning of the year	0	46129297	46129297.00	461292970	461292970	
Increase during the year	0.00	3225000.00	3225000.00	32250000.00	32250000.00	1257750000.00
i Public Issues	0	0	0.00	0	0	
ii Rights issue	0	0	0.00	0	0	
iii Bonus issue	0	0	0.00	0	0	
iv Private Placement/ Preferential allotment	0	3225000	3225000.00	32250000	32250000	1257750000
v ESOPs	0	0	0.00	0	0	
vi Sweat equity shares allotted	0	0	0.00	0	0	
vii Conversion of Preference share	0	0	0.00	0	0	
viii Conversion of Debentures	0	0	0.00	0	0	
ix GDRs/ADRs	0	0	0.00	0	0	
x Others, specify						
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Buy-back of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify			0			
At the end of the year	0.00	49354297.00	49354297.00	493542970.00	493542970.00	
(ii) Preference shares						
At the beginning of the year	0	23184798	23184798.00	231847980	231847980	
Increase during the year	0.00	6913750.00	6913750.00	69137500.00	69137500.00	2696362500.00

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
i Issues of shares	0	6913750	6913750.00	69137500	69137500	2696362500
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify			0			
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Redemption of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify			0			
At the end of the year	0.00	30098548.00	30098548.00	300985480.00	300985480.00	

ISIN of the equity shares of the company: INE0LRI01014

ii Details of stock split/consolidation during the year (for each class of shares): 0

Class of shares		
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

Number of transfers: 1

Attachments:

1. Details of shares/Debentures Transfers | Transfer Details.xlsm

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

(a) Non-convertible debentures

*Number of classes | 0

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of non-convertible 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
Total				

(b) Partly convertible debentures

*Number of classes | 0

Classes of partly convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of partly convertible 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
Total				

(c) Fully convertible debentures

*Number of classes | 0

Classes of fully convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of fully convertible 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
Total				

(d) Summary of Indebtedness

Particulars	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	0.00	0.00	0.00	0.00
Partly convertible debentures	0.00	0.00	0.00	0.00
Fully convertible debentures	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00

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	46758912940
ii * Net worth of the Company	18987031464

VI SHARE HOLDING PATTERN

A Promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	28359618	57.46	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	0	0.00	0	0.00

10	Others		0		0
	Total	28359618.00	57.46	0.00	0

Total number of shareholders (promoters) 3

B Public/Other than promoters

S. No	Category	Equity		Preference	
		Number of shares	**Percentage**	**Number of shares**	**Percentage**
1	Individual/Hindu Undivided Family				
	(i) Indian	13715023	27.79	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	7279456	14.75	0	0.00

10	Others Financial Inst.	200	0.00	30098548	100.00
	Total	20994679.00	42.54	30098548.00	100

Total number of shareholders (other than promoters) 14

Total number of shareholders (Promoters + Public/Other than promoters) 17.00

Breakup of total number of shareholders (Promoters + Other than promoters)

Sl.No	**Category**	
1	Individual - Female	2
2	Individual - Male	5
3	Individual - Transgender	0
4	Other than individuals	10
	Total	17.00

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

Name of the FII	**Address**	**Date of Incorporation**	**Country of Incorporation**	**Number of shares held**	**% of shares held**

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS
[Details of Promoters, Members (other than promoters), Debenture holders]

Details	**At the beginning of the year**	**At the end of the year**
Promoters	9	3
Members (other than promoters)	9	14
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	1	2	1	2	29.89	27.57
B Non-Promoter	0	3	0	6	0.00	0.00
i Non-Independent	0	1	0	3	0	0
ii Independent	0	2	0	3	0	0
C Nominee Directors representing	0	0	0	0	0.00	0.00
i. Banks and 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		
Total	1	5	1	8	29.89	27.57

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date: 11

B (i) Details of directors and Key managerial personnel as on the closure of financial year

Name	DIN/PAN	Designation	Number of equity shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
JASBIR SINGH	01668231	Managing Director	14753527	
SUKHBIR SINGH	01785240	Director	12179009	
LAXIT AWLA	06976288	Director	1427082	
HARBHAJAN SINGH	02922092	Director	0	
HEMANT SAHAI	00088238	Director	0	

OISTEIN MAGNAR ANDRESEN	00521028	Director	0	
BJORNAR BAUGERUD	10528247	Director	0	
ASHOK LAVASA	07575403	Director	0	
KAINAAT AWLA	10546630	Additional Director	0	26/09/2025
DUSHYANT KUMAR	APNPK8847H	CFO	0	
VISHAL GARG	AFKPG5276K	Company Secretary	0	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year 1

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation (DD/MM/YYYY)	Nature of change (Appointment/ Change in designation/ Cessation)
BJORNAR BAUGERUD	10528247	Additional Director	06/05/2024	Appointment

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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 (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	23/08/2024	18	5	54.04
Extra Ordinary General Meeting	23/01/2025	18	6	54.04

B BOARD MEETINGS

*Number of meetings held 10

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance

			Number of directors attended	% of attendance
1	16/04/2024	6	5	83.33
2	22/05/2024	7	7	100
3	26/06/2024	7	7	100
4	23/08/2024	7	7	100
5	01/10/2024	7	7	100
6	21/11/2024	8	8	100
7	09/12/2024	8	8	100
8	30/12/2024	8	7	87.5
9	23/01/2025	8	8	100
10	19/03/2025	8	7	87.5

C COMMITTEE MEETINGS

Number of meetings held: 6

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee Meeting	22/05/2024	3	3	100
2	Audit Committee Meeting	23/08/2024	3	3	100
3	Audit Committee Meeting	21/11/2024	3	3	100
4	Audit Committee Meeting	19/03/2025	3	3	100
5	Nomination and Remuneration Committee Meeting	22/05/2024	4	4	100
6	Nomination and Remuneration Committee Meeting	23/08/2024	4	4	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	19/06/2025 (Y/N/NA)
1	ASHOK LAVASA	5	5	100	0	0	0	Yes
2	KAINAAT AWLA	0	0	0	0	0	0	Yes
3	JASBIR SINGH	10	10	100	0	0	0	Yes
4	SUKHBIR SINGH	10	8	80	0	0	0	Yes
5	LAXIT AWLA	10	10	100	2	2	100	No
6	HARBHAJAN SINGH	10	10	100	6	6	100	No
7	HEMANT SAHAI	10	10	100	6	6	100	No
8	OISTEIN MAGNAR ANDRESEN	7	7	100	0	0	0	No
9	BJORNAR BAUGERUD	9	9	100	6	6	100	Yes

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

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

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Jasbir Singh	Managing Director	20750000	0	0	0	20750000.00
	Total		20750000.00	0.00	0.00	0.00	20750000.00

B *Number of CEO, CFO and Company secretary whose remuneration details to be entered: 2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount

1	Vishal Garg	Company Secretary	2463476	0	0	0	2463476.00
2	Dushyant Kumar	CFO	10484463	0	0	0	10484463.00
	Total		12947939.00	0.00	0.00	0.00	12947939.00

C *Number of other directors whose remuneration details to be entered | 4

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Sukhbir Singh	Director	20260000	0	0	0	20260000.00
2	Harbhajan Singh	Director	1000000	0	0	0	1000000.00
3	Hemant Sahai	Director	1000000	0	0	0	1000000.00
4	Ashok Lavasa	Director	500000	0	0	0	500000.00
	Total		22760000.00	0.00	0.00	0.00	22760000.00

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 | 3

Name of the company/ directors/ officers	Name of the court/ concerned Authority	Date of Order (DD/MM/YYYY)	Name of the Act and section under which penalised / punished	Details of penalty/ punishment	Details of appeal (if any) including present status
Jasbir Singh	Registrar of Companies, Punjab & Chandigarh	20/11/2024	Section 165 of the Companies Act, 2013	2,00,000	NA

Sukhbir Singh	Registrar of Companies, Punjab & Chandigarh	20/11/2024	Section 165 of the Companies Act, 2013	2,00,000	NA
Laxit Awla	Registrar of Companies, Punjab & Chandigarh	20/11/2024	Section 165 of the Companies Act, 2013	2,00,000	NA

B *DETAILS OF COMPOUNDING OF OFFENCES ☑ Nil

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

XIII Details of Shareholder / Debenture holder

Number of shareholder/ debenture holder: 17

XIV Attachments

(a) List of share holders, debenture holders: Details of Shareholder or Debenture holder.xlsm.xlsm

(b) Optional Attachment(s), if any: Revised Clarification letter_ SIL 03.11.2025.pdf
MGT-8_SAEL_signed.pdf

XV 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.

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 applicable 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 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 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.

I/ We have examined the registers, records and books and papers of SAEL INDUSTRIES LIMITED as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we 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:

1 its status under the Act;
2 maintenance of registers/records & making entries therein within the time prescribed therefor;
3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal , Court or other authorities within/beyond the prescribed time;
4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, 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 including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
5 closure of Register of Members / Security holders, as the case may be.
6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
7 contracts/arrangements with related parties as specified in section 188 of the Act;
8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act
10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;
12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
15 acceptance/ renewal/ repayment of deposits;
16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;
17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act ;
18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Manish Gupta
Digitally signed by Manish Gupta
Date: 2025.11.03 20:55:11 +05'30'

Name	MANISH GUPTA
Date (DD/MM/YYYY)	03/11/2025
Place	New Delhi

Whether associate or fellow:

○ Associate ◉ Fellow

Certificate of practice number: 4*9*

XVI Declaration under Rule 9(4) of the Companies (Management and Administration) Rules, 2014

*(a) DIN/PAN/Membership number of Designated Person: AFKPG5276K

*(b) Name of the Designated Person: VISHAL GARG

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 07 dated* (DD/MM/YYYY) 26/04/2022 to sign this form and declare that all the requirements of 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:

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.

***To be digitally signed by**

JASBIR SINGH Digitally signed by JASBIR SINGH Date: 2025.11.03 17:52:20 +05'30'

*Designation

(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))

Director

*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator: 0*6*8*3*

***To be digitally signed by**

VISHAL GARG Digitally signed by VISHAL GARG Date: 2025.11.03 20:38:59 +05'30'

◉ Company Secretary ○ Company secretary in practice

*Whether associate or fellow:

○ Associate ◉ Fellow

Membership number: 6*6*

Certificate of practice number	

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

For office use only:

eForm Service request number (SRN)	AB8748396
eForm filing date (DD/MM/YYYY)	03/11/2025

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