

Form No. MGT-9
EXTRACT OF ANNUAL RETURN

As on the financial year ended on March 31, 2019

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

I. REGISTRATION & OTHER DETAILS:

1	CIN	L27201DL1974PLC007114
2	Registration Date	26.02.1974
3	Name of the Company	Rama Steel Tubes Limited
4	Category/ Sub-Category of the Company	Public Company
5	Address of the Registered office and contact details	A-15, 3 rd Floor, Swasthya Vihar, New Delhi – 110092 Contact No. 011-49446661, 43656667, Fax No.- 011-43656699 Email - info@ramasteel.com; investors@ramasteel.com Website-www.ramasteel.com
6	Whether listed company	Yes
7	Name, Address and Contact details of Registrar and Transfer Agent, if any	Bigshare Services Private Limited 302, Kushal Bazar, 32-33, Nehru Place, New Delhi-110019 Email-bssdelhi@bigshareonline.com Phone No.-011-42425004

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

S. No.	Name and Description of main products / services	NIC Code of the Product/ service	% to total turnover of the company
1	Manufacturing and Trading of Steel Pipes	24311	99.20%

IV. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

S. No	Name & Address of the Company	CIN/ GLN	Holding/ Subsidiary/ Associate	% of Shares held	Applicable Section
1	RST INTERNATIONAL TRADING, FZE DUBAI	--	Wholly owned Subsidiary	100	2(87)(ii)
2	LEPAKSHI TUBES PRIVATE LIMITED	U28990DL2016PTC302210	Wholly owned Subsidiary	100	2(87)(ii)

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

A) Category-wise Share Holding

Category of Shareholders	No. of Shares held on 31-March-2018				No. of Shares held on 31-March-2019				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	10123000	0	10123000	60.28	10143000	0	10143000	60.40	0.12
b) Central Govt	0	0	0	0.00	0	0	0	0.00	0.00
c) State Govt(s)	0	0	0	0.00	0	0	0	0.00	0.00
d) Bodies Corp.	0	0	0	0.00	0	0	0	0.00	0.00
e) Banks / FI	0	0	0	0.00	0	0	0	0.00	0.00
f) Any other	0	0	0	0.00	0	0	0	0.00	0.00
Sub-total (A) (1):-	10123000	0	10123000	60.28	10143000	0	10143000	60.40	0.12



Category of Shareholders	No. of Shares held on 31-March-2018				No. of Shares held on 31-March-2019				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
(2) Foreign									0.00
a) NRIs - Individuals	0	0	0	0.00	0	0	0	0.00	0.00
b) Other – Individuals	0	0	0	0.00	0	0	0	0.00	0.00
c) Bodies Corp.	0	0	0	0.00	0	0	0	0.00	0.00
d) Banks / FI	0	0	0	0.00	0	0	0	0.00	0.00
e) Any Other....	0	0	0	0.00	0	0	0	0.00	0.00
Sub -total (A) (2):-	0	0	0	0.00	0	0	0	0.00	0.00
Total shareholding of Promoter (A) = (A)(1)+(A) (2)	10123000	0	10123000	60.28	10143000	0	10143000	60.40	0.12
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	255000	0	255000	1.52	0	0	0	0.00	-1.52
b) Banks / FI	109941	0	109941	0.65	65	0	65	0.00	-0.65
c) Central Govt	0	0	0	0.00	0	0	0	0.00	0.00
d) State Govt(s)	0	0	0	0.00	0	0	0	0.00	0.00
e) Venture Capital Funds	0	0	0	0.00	0	0	0	0.00	0.00
f) Insurance Companies	0	0	0	0.00	0	0	0	0.00	0.00
g) FIs	0	0	0	0.00	0	0	0	0.00	0.00
h) Foreign Venture Capital Funds	0	0	0	0.00	0	0	0	0.00	0.00
i) Others (specify) Foreign Portfolio Investor	48088	0	48088	0.29	0	0	0	0.00	-0.29
Sub-total (B)(1):-	413029	0	413029	2.46	65	0	65	0.00	-2.46
2. Non-Institutions									
a) Bodies Corp.	688897	0	68897	4.10	735993	0	735993	4.38	0.28
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 2 lakh	2477454	66001	2543455	15.15	2392398	45001	2437399	14.51	-0.64
ii) Individual shareholders holding nominal share capital in excess of Rs 2 lakh	2552493	0	2552493	15.20	3009763	0	3009763	17.92	2.72
c) Others (specify)									
Non Resident Indians	122576	0	122576	0.73	84862	0	84862	0.50	-0.23
Clearing Member	350550	0	350550	2.09	382918	0	382918	2.28	0.19
Sub-total (B)(2):-	6191970	66001	6257971	37.26	6605934	45001	6650935	37.26	-2.52
Total Public Shareholding (B)=(B)(1)+ (B)(2)	6604999	66001	6671000	39.72	6605999	45001	6651000	39.60	-0.12



Category of Shareholders	No. of Shares held on 31-March-2018				No. of Shares held on 31-March-2019				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
C. Shares held by Custodian for GDRs & ADRs									
Promoter and promoter group	0	0	0	0.00	0	0	0	0.00	0.00
Public	0	0	0	0.00	0	0	0	0.00	0.00
Sub-total (C)	0	0	0	0.00	0	0	0	0.00	0.00
Grand Total (A+B+C)	16727999	66001	16794000	100.00	16748999	45001	16794000	100.00	0.00

B) Shareholding of Promoter-

S. 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	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Naresh Kumar Bansal	6088000	36.25	0.00	6108000	36.37	0.00	0.12
2	Kumud Bansal	690000	4.11	0.00	690000	4.11	0.00	0.00
3	Richi Bansal	1443000	8.59	0.00	1443000	8.59	0.00	0.00
4	Krati Bansal	450000	2.68	0.00	450000	2.68	0.00	0.00
5	Nikhil Naresh Bansal	1341000	7.99	0.00	1341000	7.99	0.00	0.00
6	Kanika Bansal	111000	0.66	0.00	111000	0.66	0.00	0.00

C) Change in Promoters' Shareholding

S. No.	Name of Shareholder	Shareholding of the promoters		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	Naresh Kumar Bansal				
	At the beginning of the year	6088000	36.25		
	Change during the Year	20000			
	At the end of the year			6108000	36.37
2	Kumud Bansal				
	At the beginning of the year	690000	4.11		
	Change during the Year	0			
	At the end of the year			690000	4.11
3	Richi Bansal				
	At the beginning of the year	1443000	8.59		
	Change during the Year	0			
	At the end of the year			1443000	8.59
4	Krati Bansal				
	At the beginning of the year	450000	2.68		
	Change during the Year	0			



S. No.	Name of Shareholder	Shareholding of the promoters		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 end of the year			450000	2.68
5	Nikhil Naresh Bansal				
	At the beginning of the year	1341000	7.99		
	Change during the Year	0			
	At the end of the year			1341000	7.99
6	Kanika Bansal				
	At the beginning of the year	111000	0.66		
	Change during the Year	0			
	At the end of the year			111000	0.66

D) Shareholding Pattern of top ten Shareholders (Other than Directors and Promoters):

S. No.	Name of Shareholders (Top 10 Shareholders)	Shareholding at the beginning of the year		Shareholding at the end of the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1	TARUN DHIR	954821	5.69	954821	5.69
2	MADHUKAR SHETH	465828	2.77	753670	4.49
3	PUNE E STOCK BROKING PVT LTD - COLLATERAL ACCOUNT	72838	0.43	399239	2.38
4	RITA DHAWAN	274602	1.64	297602	1.77
5	SIDDHARTH IYER	275927	1.64	0	0.00
6	PRAFULCHANDRA ANANTRAI DESAI	41900	0.25	192980	1.15
7	PRINCIPAL TRUSTEE COMPANY PVT LTD A/C PRINCIPAL MUTUAL FUND - PRINCIPAL FOCUSED MULTICAP FUND	144000	0.86	0	0.00
8	DESAI NIRAL NEERAV	7000	0.04	141572	0.84
9	BHARTI AXA LIFE INSURANCE COMPANY LTD	118000	0.70	0	0.00
10	AXIS BANK LIMITED	109941	0.65	65	0.00
11	SUMIT P DESAI (HUF)	100000	0.60	100000	0.60
12	KAMAL VISARIA	100000	0.60	100000	0.60
13	PANTOMATH STOCK BROKERS PRIVATE LIMITED	99150	0.59	14000	0.08
14	JYOTIVARDHAN JAIPURIA	71551	0.43	90623	0.54
15	INKAM FINVEST PVT LTD	26944	0.16	85300	0.51

S. No.	Name of Shareholder	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
1	TARUN DHIR				
	At the beginning of the year	954821	5.69		
	Change during the Year	0	0.00		
	At the end of the year			954821	5.69
2	MADHUKAR SHETH				
	At the beginning of the year	465828	2.77		
	Change during the Year				



S. No.	Name of Shareholder	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
	27-07-2018	25000		490828	2.92
	14-09-2018	77500		568328	3.38
	21-09-2018	-12422		555906	3.31
	26-09-2018	-2236		553670	3.30
	19-10-2018	100000		653670	3.89
	29-03-2019	100000		753670	4.49
	At the end of the year			753670	4.49
3	PUNE E STOCK BROKING PVT LTD - COLLATERAL ACCOUNT				
	At the beginning of the year	72838	0.43		
	Change during the Year				
	6-Apr-18	-965		71873	0.43
	13-Apr-18	1121		72994	0.43
	20-Apr-18	15973		88967	0.53
	27-Apr-18	167		89134	0.53
	4-May-18	-70565		18569	0.11
	11-May-18	20562		39131	0.23
	18-May-18	17149		56280	0.34
	25-May-18	13951		70,231	0.42
	1-Jun-18	8751		78,982	0.47
	8-Jun-18	-10776		68,206	0.41
	15-Jun-18	-57180		11,026	0.07
	22-Jun-18	19480		30,506	0.18
	29-Jun-18	3657		34,163	0.20
	6-Jul-18	-21618		12,545	0.07
	13-Jul-18	-8879		3,666	0.02
	20-Jul-18	7378		11,044	0.07
	27-Jul-18	30466		41,510	0.25
	3-Aug-18	-8621		32,889	0.20
	10-Aug-18	-20130		12,759	0.08
	17-Aug-18	-3920		8,839	0.05
	24-Aug-18	-414		8,425	0.05
	31-Aug-18	-6115		2,310	0.01
	7-Sep-18	164834		1,67,144	1.00
	14-Sep-18	-145441		21,703	0.13
	21-Sep-18	32691		54,394	0.32
	24-Sep-18	-54394		0	0.00
	26-Sep-18	38587		38,587	0.23
	28-Sep-18	-31170		7,417	0.04
	5-Oct-18	72062		79,479	0.47
	12-Oct-18	8245		87,724	0.52
	19-Oct-18	20632		1,08,356	0.65
	26-Oct-18	6271		1,14,627	0.68
	2-Nov-18	-26748		87,879	0.52
	9-Nov-18	8835		96,714	0.58
	16-Nov-18	-69948		26,766	0.16
	23-Nov-18	-20573		6,193	0.04
	30-Nov-18	341508		3,47,701	2.07



S. No.	Name of Shareholder	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
	7-Dec-18	12139		3,59,840	2.14
	14-Dec-18	73327		4,33,167	2.58
	21-Dec-18	-108634		3,24,533	1.93
	28-Dec-18	-37003		2,87,530	1.71
	31-Dec-18	-28193		2,59,337	1.54
	4-Jan-19	61848		3,21,185	1.91
	11-Jan-19	-54924		2,66,261	1.59
	18-Jan-19	-36717		2,29,544	1.37
	25-Jan-19	62761		2,92,305	1.74
	1-Feb-19	48897		3,41,202	2.03
	8-Feb-19	12033		3,53,235	2.10
	15-Feb-19	44040		3,97,275	2.37
	22-Feb-19	-31189		3,66,086	2.18
	1-Mar-19	-215112		1,50,974	0.90
	8-Mar-19	35546		1,86,520	1.11
	15-Mar-19	17645		2,04,165	1.22
	22-Mar-19	-57866		1,46,299	0.87
	29-Mar-19	252940		3,99,239	2.38
	At the end of the year			399239	2.38
4	RITA DHAWAN				
	At the beginning of the year	274602	1.64		
	Change during the Year				
	2-Nov-18	23000		297602	1.77
	At the end of the year			297602	1.77
5	SIDDHARTH IYER				
	At the beginning of the year	275927	1.64	0	0.00
	Change during the Year				
	8-Jun-18	-66000		2,09,927	1.25
	6-Jul-18	-200000		9,927	0.06
	20-Jul-18	-9927		0	0.00
	At the end of the year			0	0.00
6	PRAFULCHANDRA ANANTRAI DESAI				
	At the beginning of the year	41900	0.25		
	Change during the Year				
	10-Aug-18	-1000		40,900	0.24
	21-Sep-18	40000		80,900	0.48
	26-Oct-18	112080		1,92,980	1.15
	At the end of the year			192980	1.15
7	PRINCIPAL TRUSTEE COMPANY PVT LTD A/C PRINCIPAL MUTUAL FUND - PRINCIPAL FOCUSED MULTICAP FUND				
	At the beginning of the year	144000	0.86		
	Change during the Year				
	11-May-18	-6915		1,37,085	0.82
	18-May-18	-44847		92,238	0.55



S. No.	Name of Shareholder	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
	25-May-18	-16580		75,658	0.45
	1-Jun-18	-15900		59,758	0.36
	8-Jun-18	-6000		53,758	0.32
	22-Jun-18	-21776		31,982	0.19
	29-Jun-18	-31982		0	0.00
	At the end of the year			0	0.00
8	DESAI NIRAL NEERAV				
	At the beginning of the year	7000	0.04		
	Change during the Year				
	3-Aug-18	134572		141572	0.84
	At the end of the year			141572	0.84
9	BHARTI AXA LIFE INSURANCE COMPANY LTD				
	At the beginning of the year	118000	0.70		
	Change during the Year				
	24-Aug-18	-5000		1,13,000	0.67
	31-Aug-18	-4000		1,09,000	0.65
	9-Nov-18	-5000		1,04,000	0.62
	23-Nov-18	-10000		94,000	0.56
	30-Nov-18	-5000		89,000	0.53
	1-Feb-19	-4000		85,000	0.51
	8-Feb-19	-85000		0	0.00
	At the end of the year			0	0.00
10	AXIS BANK LIMITED				
	At the beginning of the year	109941	0.65		
	Change during the Year				
	13-Apr-18	24500		1,34,441	0.80
	27-Apr-18	-68074		66,367	0.40
	4-May-18	-24565		41,802	0.25
	11-May-18	5800		47,602	0.28
	18-May-18	-5780		41,822	0.25
	25-May-18	15250		57,072	0.34
	1-Jun-18	-25219		31,853	0.19
	8-Jun-18	-51		31,802	0.19
	15-Jun-18	77		31,879	0.19
	22-Jun-18	199		32,078	0.19
	29-Jun-18	-617		31,461	0.19
	6-Jul-18	-11396		20,065	0.12
	20-Jul-18	1245		21,310	0.13
	27-Jul-18	-1087		20,223	0.12
	3-Aug-18	-158		20,065	0.12
	17-Aug-18	-19396		669	0.00
	24-Aug-18	8709		9,378	0.06
	31-Aug-18	-8077		1,301	0.01
	7-Sep-18	4396		5,697	0.03
	14-Sep-18	-5114		583	0.00
	21-Sep-18	9546		10,129	0.06



S. No.	Name of Shareholder	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
	26-Sep-18	15520		25,649	0.15
	28-Sep-18	144989		1,70,638	1.02
	5-Oct-18	-169792		846	0.01
	12-Oct-18	-528		318	0.00
	19-Oct-18	-253		65	0.00
	30-Nov-18	1976		2,041	0.01
	7-Dec-18	-1836		205	0.00
	14-Dec-18	-140		65	0.00
	8-Mar-19	100		165	0.00
	22-Mar-19	-100		65	0.00
	At the end of the year			65	0.00
11	SUMIT P DESAI (HUF)				
	At the beginning of the year	100000	0.60		
	Change during the Year				
	8-Jun-18	-50000		50,000	0.30
	15-Jun-18	50000		1,00,000	0.60
	At the end of the year			100000	0.60
12	KAMAL VISARIA				
	At the beginning of the year	100000	0.60		
	Change during the Year	0	0.00		
	At the end of the year			100000	0.60
13	PANTOMATH STOCK BROKERS PRIVATE LIMITED				
	At the beginning of the year	99150	0.59		
	Change during the Year				
	6-Apr-18	33		99,183	0.59
	8-Jun-18	850		1,00,033	0.60
	31-Aug-18	-1		1,00,032	0.60
	29-Sep-18	-13927		86,105	0.51
	5-Oct-18	-4		86,101	0.51
	12-Oct-18	-47425		38,676	0.23
	19-Oct-18	-5461		33,215	0.20
	26-Oct-18	32		33,247	0.20
	23-Nov-18	500		33,747	0.20
	7-Dec-18	4		33,751	0.20
	14-Dec-18	-8501		25,250	0.15
	28-Dec-18	-15000		10,250	0.06
	31-Dec-18	-8571		1,679	0.01
	18-Jan-19	-1679		0	0.00
	29-Mar-19	14000		14,000	0.08
	At the end of the year			14000	0.08
14	JYOTIVARDHAN JAIPURIA				
	At the beginning of the year	71551	0.43		
	Change during the Year				
	21-Dec-18	19072		90623	0.54
	At the end of the year			90623	0.54



S. No.	Name of Shareholder	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
15	INKAM FINVEST PVT LTD				
	At the beginning of the year	26944	0.16		
	Change during the Year				
	6-Apr-18	5004		31,948	0.19
	13-Apr-18	2055		34,003	0.20
	20-Apr-18	3130		37,133	0.22
	27-Apr-18	9328		46,461	0.28
	4-May-18	-1461		45,000	0.27
	25-May-18	-25000		20,000	0.12
	29-Jun-18	5750		25,750	0.15
	3-Aug-18	25000		50,750	0.30
	14-Sep-18	-5000		45,750	0.27
	21-Sep-18	6250		52,000	0.31
	26-Sep-18	3000		55,000	0.33
	23-Nov-18	24000		79,000	0.47
	21-Dec-18	10000		89,000	0.53
	25-Jan-19	-700		88,300	0.53
	1-Feb-19	-3000		85,300	0.51
	At the end of the year			85300	0.51

E) **Shareholding of Directors and Key Managerial Personnel:**

SN	Shareholding of each Directors and each Key Managerial Personnel	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
1	Naresh Kumar Bansal				
	At the beginning of the year	6088000	36.25		
	Change during the Year	20000			
	At the end of the year			6108000	36.37
2	Richi Bansal				
	At the beginning of the year	1443000	8.59		
	Change during the Year	0			
	At the end of the year			1443000	8.59



V) **INDEBTEDNESS** -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(₹ in Lakhs)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	4925.38	107.47	NIL	5032.85
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
Total (i+ii+iii)	4925.38	107.47	NIL	5032.85
Change in Indebtedness during the financial year				
* Addition	60065.18	56.67	NIL	60121.85
* Reduction	58095.13	42.96	NIL	58138.09
Net Change	1970.05	13.71	NIL	1983.76
Indebtedness at the end of the financial year				
i) Principal Amount	6895.43	121.18	NIL	7016.61
ii) Interest due but not paid	-	-	NIL	-
iii) Interest accrued but not due	-	-	NIL	-
Total (i+ii+iii)	6895.43	121.18	NIL	7016.61

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

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

(₹ in Lakhs)

S. No.	Particulars of Remuneration	Name of MD/WTD/ Manager	Name of Other Executive Director		Total Amount
		Mr. Naresh Kumar Bansal, MD	Mr. Richi Bansal, Director	Mr. Surender Kumar Sharma	
1	Gross salary				
	(a) Salary as per provisions contained in Section 17(1) of the Income-tax Act, 1961	39.60	33.60	3.03	76.23
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	0.40	0.40	0.17	0.97
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-	-	-
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission - as % of profit - others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-
	Total (A)	40.00	34.00	3.20	77.20
	Ceiling as per the Act	The Managerial Remuneration is within the limit, as prescribed under the Companies Act, 2013.			



B. Remuneration to other directors

(₹ in Lakhs)

S. N.	Particulars of Remuneration	Name of Directors			Total Amount
		Mr. Bharat Bhushan Sahny	Mr. Rajendra Prasad Khanna	Mrs. Anju Gupta	
1	Independent Directors				
	Fee for attending board committee meetings	0.30	0.10	0.30	0.70
	Remuneration by way of Commission	-	-	-	-
	Others, please specify	-	-	-	-
	Total (1)	0.30	0.10	0.30	0.70
2	Other Non-Executive Directors				
	Fee for attending board committee meetings	-	-	-	-
	Commission	-	-	-	-
	Others, please specify	-	-	-	-
	Total (2)	-	-	-	-
	Total (B)=(1+2)				0.70
	Total Managerial Remuneration Total=(A+B)				77.90

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

SN	Particulars of Remuneration	Key Managerial Personnel		
		Company Secretary	Chief Financial Officer	Total
1	Gross salary			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	4.64	18.54	23.18
	(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			
2	Stock Option	-	-	-
3	Sweat Equity	-	-	-
4	Commission - as % of profit -others, specify...	-	-	-
5	Others, please specify	-	-	-
	Total	4.64	18.54	23.18

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty					
Punishment					
Compounding					
B. DIRECTORS					
Penalty					
Punishment					
Compounding					
C. OTHER OFFICERS IN DEFAULT					
Penalty					
Punishment					
Compounding					

