Form No. MGT-7

Form language

(•) English ( ) Hindi

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]

*All fields marked in * are mandatory*

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN) — L28920MH1983PLC029879

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	SULABH ENGINEERS AND SERVICES LIMITED	SULABH ENGINEERS AND SERVICES LIMITED
Registered office address	206, 2ndFloor,Apollo Complex Premises Coop Society RK Singh Marg,Parsi Panchyat Road, Andhe,ri,NA,Mumbai,Mumbai City,Maharashtra,India,400069	206, 2nd Floor, Apollo Complex Premises Coop Society RK Singh Marg,Parsi Panchyat Road, Andhe,ri,NA,Mumbai,Mumbai City,Maharashtra,India,400069
Latitude details	19.126312	19.126312
Longitude details	72.851975	72.851975

(a) *Photograph of the registered office of the Company showing external building and name prominently visible — Registered Office Images_MGT-7.pdf

(b) *Permanent Account Number (PAN) of the company — AA******7M

(c) *e-mail ID of the company — *****HENG22@GMAIL.COM

(d) *Telephone number with STD code — 02**********12

(e) Website | www.sulabh.org.in

iv *Date of Incorporation (DD/MM/YYYY) | 27/04/1983

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
1	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)

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
U74899DL1995PTC071324	SKYLINE FINANCIAL SERVICES PRIVATE LIMITED	D-153A, FIRST FLOOR OKHLA INDUSTRIAL AREA, PHASE-I, NEW DELHI,New Delhi,Delhi,India,110020	INR000003241

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

(b) If yes, date of AGM (DD/MM/YYYY) | 20/09/2025

(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	K	Financial and insurance activities	64	Financial service activities, except insurance and pension funding	100

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

i *No. of Companies for which information is to be given: 1

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Joint Venture	% of shares held
1	U01131DL2012PTC238155		VENKATSWAMY MINING AND ESTATES PRIVATE LIMITED	Subsidiary	51

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	110000000.00	100475000.00	100475000.00	100475000.00
Total amount of equity shares (in rupees)	110000000.00	100475000.00	100475000.00	100475000.00

Number of classes: 1

Class of shares: EQUITY	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	110000000	100475000	100475000	100475000
Nominal value per share (in rupees)	1	1	1	1
Total amount of equity shares (in rupees)	110000000.00	100475000.00	100475000	100475000

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	0.00	0.00	0.00	0.00
Total amount of preference shares (in rupees)	0.00	0.00	0.00	0.00

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

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	335945	100139055	100475000.00	100475000	100475000	
Increase during the year	0.00	75000.00	75000.00	75000.00	75000.00	0.00
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	0	0.00	0	0	
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 DEMAT	0	75000	75000.00	75000	75000	0
Decrease during the year	75000.00	0.00	75000.00	75000.00	75000.00	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 DEMAT	75000	0	75000.00	75000	75000	
At the end of the year	260945.00	100214055.00	100475000.00	100475000.00	100475000.00	
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Issues of shares	0	0	0.00	0	0	
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify NA	0	0	0.00	0	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 NA	0	0	0.00		0	
At the end of the year	0.00	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company: INE673M01029

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

Attachments:

1. Details of shares/Debentures Transfers

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: 16532000

ii * Net worth of the Company: 287437000

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	22683437	22.58	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)	3000000	2.99	0	0.00

10	Others	0	0.00	0	0.00
	Total	25683437.00	25.57	0.00	0

Total number of shareholders (promoters): 9

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	54820210	54.56	0	0.00
	(ii) Non-resident Indian (NRI)	159175	0.16	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	49750	0.05	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	15945	0.02	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)	15382406	15.31	0	0.00

10	Others Firms,Trust,etc	4364077	4.34	0	0.00
	Total	74791563.00	74.44	0.00	0

Total number of shareholders (other than promoters): 19628

Total number of shareholders (Promoters + Public/Other than promoters): 19637.00

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

Sl.No	Category	
1	Individual - Female	0
2	Individual - Male	19321
3	Individual - Transgender	0
4	Other than individuals	316
	Total	19637.00

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	9
Members (other than promoters)	18723	19628
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	0	0	0	0	0
B Non-Promoter	2	3	2	3	0.00	0.00
i Non-Independent	2	0	2	0	0	0
ii Independent	0	3	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	0	0
Total	2	3	2	3	0.00	0.00

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date: 7

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)
VIMAL KUMAR SHARMA	00954083	Managing Director	0	
SEEMA MITTAL .	06948908	Director	0	
SEEMA MITTAL .	CCAPM1399E	CFO	0	
VIJAY KUMAR JAIN	08208856	Director	0	
DEEPAK AGARWAL	02247228	Director	0	

AMIT KUMAR KANAUJIA	CNSPK8778G	Company Secretary	0	13/06/2025
AMAN PREET KAUR	09711954	Director	0	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year 5

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)
AMAN PREET KAUR	09711954	Additional Director	14/08/2024	Appointment
AMAN PREET KAUR	09711954	Director	28/09/2024	Change in designation
RAKESH CHAND AGARWAL	03539915	Director	07/03/2025	Cessation
REKHA KEJRIWAL .	AIJPK4487E	Company Secretary	15/04/2024	Cessation
AMIT KUMAR KANAUJIA	CNSPK8778G	Company Secretary	16/04/2024	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 1

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	28/09/2024	19314	51	29.65

B BOARD MEETINGS

*Number of meetings held 8

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	5	5	100
2	28/05/2024	5	5	100
3	02/08/2024	5	5	100
4	14/08/2024	5	5	100
5	30/09/2024	6	6	100
6	14/11/2024	6	6	100
7	08/02/2025	6	6	100
8	08/03/2025	5	5	100

C COMMITTEE MEETINGS

Number of meetings held	11

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	28/05/2024	3	3	100
2	Audit Committee Meeting	02/08/2024	3	3	100
3	Audit Committee Meeting	14/08/2024	3	3	100
4	Audit Committee Meeting	14/11/2024	4	4	100
5	Audit Committee Meeting	08/02/2025	4	4	100
6	Nomination and Remuneration Committee Meeting	16/04/2024	3	3	100
7	Nomination and Remuneration Committee Meeting	14/08/2024	3	3	100
8	Stakeholders Relationship Committee Meeting	28/05/2024	3	3	100
9	Stakeholders Relationship Committee Meeting	14/08/2024	3	3	100

10	Stakeholders Relationship Committee Meeting	14/11/2024	4	4	100
11	Stakeholders Relationship Committee Meeting	08/02/2025	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	20/09/2025 (Y/N/NA)
1	VIJAY KUMAR JAIN	8	8	100	2	2	100	Yes
2	DEEPAK AGARWAL	8	8	100	7	7	100	Yes
3	AMAN PREET KAUR	4	4	100	4	4	100	Yes
4	VIMAL KUMAR SHARMA	8	8	100	9	9	100	Yes
5	SEEMA MITTAL .	8	8	100	4	4	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: 0

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
	Total		0.00	0.00	0.00	0.00	0.00

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	AMIT KUMAR KANAUJIA	Company Secretary	518000	0	0	0	518000.00
2	SEEMA MITTAL	CFO	180000	0	0	0	180000.00
	Total		698000.00	0.00	0.00	0.00	698000.00

C *Number of other directors whose remuneration details to be entered: 0

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
	Total		0.00	0.00	0.00	0.00	0.00

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

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

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	19637

XIV Attachments

(a) List of share holders, debenture holders	Details of Shareholder or Debenture holder.xlsm
(b) Optional Attachment(s), if any	Letter_MGT8_LOT.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 SULABH ENGINEERS AND SERVICES 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

Name: Gopesh Sahu

Date (DD/MM/YYYY): 06/10/2025

Place: KANPUR

Whether associate or fellow:

○ Associate ● Fellow

Certificate of practice number: 7*0*

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

*(a) DIN/PAN/Membership number of Designated Person: 00954083

*(b) Name of the Designated Person: VIMAL KUMAR SHARMA

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 14 dated* (DD/MM/YYYY) 12/08/2025 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**

*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*9*4*8*

***To be digitally signed by**

◉ Company Secretary ○ Company secretary in practice

*Whether associate or fellow:

◉ Associate ○ Fellow

Membership number 7*5*2

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) AB7471862

eForm filing date (DD/MM/YYYY) 08/10/2025

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

SULABH
Engineers And Services Limited
CIN : L28920MH1983PLC029879

Web : www.sulabh.org.in
Email : sulabheng22@gmail.com
sulabhinvestorcell@gmail.com

Date: 20.08.2025

To
Registrar of Companies,
100, Everest, Marine Drive, Mumbai-400002, Maharastra.
All other stakeholders

Sub.: Disclosure under Form MGT-7 – Bifurcation of Shareholding

Dear Sir/Madam,

This is to bring to your kind notice that pursuant to the recent change in the format of *Form MGT-7*, an additional disclosure requirement has been introduced which mandates bifurcation of shareholders under the following heads: *Male, Female, Transgender and Other than Individual*.

In this regard, we had discussions with our Registrar & Transfer Agent ("RTA"), who informed us that they do not receive gender-specific data from the Depository. Thereafter, our Company made further efforts to connect directly with the Depository to ascertain the possibility of obtaining such information. However, we have been informed by the Depository that, as of now, such gender-specific data is not available at their end as well.

Accordingly, at present we are able to provide the bifurcation of shareholders only into the categories of *Individual* and *Non-Individual*. As on 31st March, 2025, our Company has a total of **19,637 shareholders**. It is not feasible for us to manually differentiate and classify them into Male, Female, and Transgender categories in the absence of any authenticated data from the Depository or RTA.

We, therefore, submit the above for your kind information.

Thanking you,

For Sulabh Engineers and Services Limited

Tauheed Ahmad

Sulabh Engineers and Services Ltd
Kanpur
208001
Padam Tower II 14/113 Civil Lines

Tauheed Ahmad
Company Secretary and Compliance Officer
(Membership No. A74592)

CS *Gopesh Sahu*

Practicing Company Secretary
F.C.S., SOCIAL AUDITOR (ICSI-ISA), L.L.B.

Ref. ....

Dated.........................

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 **SULABH ENGINEERS AND SERVICES LIMITED (CIN: L28920MH1983PLC029879)** (the Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on **31/03/2025.** In my opinion and to the best of my information and according to the examinations carried out by me by the documents provided by the company 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:

1. its status under the Act;
2. maintenance of registers/records & making entries therein within the time prescribed thereof, however, the Company has **changed the place of keeping its books of accounts** *to its Corporate Office situated at Cabin No. 365 and 366 Padam Tower II, 3rd Floor 14/113 Civil Lines, Kanpur, Uttar Pradesh- 208001 by duly filing the Form AOC-5 ;*
3. filing of forms and returns with the Registrar of Companies, Stock Exchanges and R.B.I., there were no instance of filing to Regional Director, Central Government, the Tribunal, Court or other authorities, the forms/returns were filed within the prescribed time and in case of delay in filing with the prescribed additional fees;
4. calling/ convening/ holding meetings of Board of Directors 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 Book/registers maintained for the purpose and the same have been signed;
5. Closure of Register of Members was made from **21.09.2024 to 28.09.2024 (both the days inclusive).**
6. Not made advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act, except balances of outstanding loan and advances as on **31.03.2025** amounting to Rs. 269.28 Lakhs advanced to its subsidiary company M/s Venkatswamy Mining and Estates Private Limited (previously known as Roddic Coffee Estates Private Limited;
7. There were contracts/arrangements with related parties in respect of which compliance of section 188 of the Act were made accordingly;

GOPESH SAHU ★ PRACTICING COMPANY SECRETARY C.P. No. 7800

8. has not made any issue or allotment, transfer or transmission or buy back of securities / alteration or reduction of share capital/ conversion of shares/ securities hence was not require to issue share certificates as prescribed;

9. There were no instances of 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. Has not made any declaration/ payment of dividend; thus was not required to transfer unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;

11 The audited financial statement have been signed 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 The Company has complied with the disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them; There were no changes in composition of Board of Directors of the Company during the reporting period *except that :*

a) Ms. Rekha Kejriwal (FCS 5978), Company Secretary and Compliance officer resigned from the Company as on 15.04.2024 and Mr. Amit Kumar Kanaujia, (ACS- 60196) was appointed as the Company Secretary and Compliance Officer w.e.f. 16.04.2024, in her place.

b) Company has re-appointed Mr. Vijay Kumar Jain (DIN: 08208856) as an Independent Director for a term of five consecutive years at its Annual General Meeting held on 28.09.2024.

c) Company has appointed Ms. Aman Preet Kaur (DIN: 09711954) as the Independent Director of the company for a term of five consecutive years at its Annual General Meeting held on 28.09.2024.

d) Mr. Rakesh Chand Agarwal (DIN: 03539915), Independent Director has resigned from the Company as on 07.03.2025. Furthermore, the company has reconstituted its Committees accordingly.

13 The Appointment of auditors was made as per the provisions of section 139 of the Act to the company.
During the reported period on 2nd August, 2024 Satish Soni & Co. resigned from the post of Statutory Auditor of the Company. The Company had appointed Ranjit Jain & Co., Chartered Accountants as the Statutory Auditor on the same date and his appointment was confirmed by the Shareholders of the Company for term of 5 years at the AGM held on 28th September, 2024.

GOPESH SAHU
C.P. No. 7800
PRACTICING COMPANY SECRETARY

14 There were no instances requiring to obtain approvals from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Companies Act, 2013.

15 There was no acceptance/ renewal/ repayment of deposits during the reporting period;

16 The borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, were not applicable during the reported period

17 As informed company being NBFC hence the provisions of section 186 of the Act were not applicable ;

18 There were no alteration of the provisions of Memorandum of Association and Articles of Association of the Company;

Place: Kanpur

Signature:

Date: 06.10.2025

UDIN: **F007100G001462103**

CS GOPESH SAHU
FCS: 7100
C.P. : 7800
PRU Certificate No.: 1515/2021

SULABH ENGINEERS AND SERVICES LTD (List of Transfer for the period 01/04/2024 to 31/03/2025)								
Sr.No	Date of Registration of Transfer	Type of Transfer	Number of Shares Transfered	Amount per Share (in Rs.)	Ledger Folio of Transferor	Transferor's Name	Ledger Folio of Transferee	Transferee's Name
		1 - Equity, 2 - Preference Shares, 3- Debentures, 4 - Stock						
Nil								

AS PROVIDED BY THE RTA