

**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)

L99999GJ1987PLC009768

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	20 MICRONS LIMITED	20 MICRONS LIMITED
Registered office address	9-10, G.I.D.C. INDUSTRIAL ESTATE, WAGHODIA,,NA,BARODA,Gujarat,India,391760	9-10, G.I.D.C. INDUSTRIAL ESTATE, WAGHODIA,,NA,BARODA,Gujarat,India,391760
Latitude details	22.297023	22.297023
Longitude details	73.391842	73.391842

(a) \*Photograph of the registered office of the Company showing external building and name prominently visible

Reg\_office\_photo.jpg

(b) \*Permanent Account Number (PAN) of the company

AA\*\*\*\*\*0B

(c) \*e-mail ID of the company

\*\*\*\*\*cretary@20microns.com

(d) \*Telephone number with STD code

+91\*\*\*\*\*50

(e) Website

www.20microns.com

iv \*Date of Incorporation (DD/MM/YYYY)

29/06/1987

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

Public company

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

Company limited by shares

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

Indian Non-Government 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)
2	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)

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
U67120TN1998PLC041613	CAMEO CORPORATE SERVICES LIMITED	SUBRAMANIANBUILDINGNo.1 CLUBHOUSE ROAD, CHENNAI, Tamil Nadu, India, 600002	INR000003753

ix \* (a) Whether Annual General Meeting (AGM) held

☒ Yes

☐ No

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

08/08/2025

(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	B	Mining and quarrying	8	Other Mining & Quarrying Activities	100

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

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

9

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1	U15543GJ1993PLC020540		20 MICRONS NANO MINERALS LIMITED	Subsidiary	97.21
2	U25200GJ1992PTC018109		20 MCC PRIVATE LIMITED	Subsidiary	100
3		807569H	20 MICRONS SDN BHD	Subsidiary	99.99
4		0107904093	20 MICRONS FZE	Subsidiary	100
5		01-01-09022	20 MICRONS VIETNAM COMPANY LIMITED	Subsidiary	100
6	U26952GJ2021FTC126229		DORFNER-20 MICRONS PRIVATE LIMITED	Joint Venture	45
7	U46909GJ2024FTC156406		SIEVERT 20 MICRONS BUILDING MATERIALS PRIVATE LIMITED	Joint Venture	40

8		199401025288	GOH TEIK LIM QUARRY SDN BHD	Subsidiary	90
9		198501012695	IQ MARBLE SDN BHD	Subsidiary	86.68

#### 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	60000000.00	35286502.00	35286502.00	35286502.00
Total amount of equity shares (in rupees)	300000000.00	176432510.00	176432510.00	176432510.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
EQUITY				
Number of equity shares	60000000	35286502	35286502	35286502
Nominal value per share (in rupees)	5	5	5	5
Total amount of equity shares (in rupees )	300000000.00	176432510.00	176432510	176432510

###### (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
<div></div>				
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			
<b>(i) Equity shares</b>						
<b>At the beginning of the year</b>	8275	35278227	35286502.00	176432510	176432510	
<b>Increase during the year</b>	0.00	402.00	402.00	2010.00	2010.00	0
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	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
x Others, specify <div>Dematerialised</div>		402		2010	2010	
<b>Decrease during the year</b>	402.00	0.00	402.00	2010.00	2010.00	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 <div>0</div>	402	0	402.00	2010	2010	
<b>At the end of the year</b>	7873.00	35278629.00	35286502.00	176432510.00	176432510.00	
<b>(ii) Preference shares</b>						
<b>At the beginning of the year</b>	0	0	0.00	0	0	
<b>Increase during the year</b>	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 <div>0</div>	0	0	0.00	0	0	
<b>Decrease during the year</b>	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 <div>0</div>			0		0	
<b>At the end of the year</b>	0.00	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company

INE144J01027

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
<b>Total</b>	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
<b>Total</b>					

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

i \*Turnover

7949197996

ii \* Net worth of the Company

3811303656

**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	7227183	20.48	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)	8666181	24.56	0	0.00
10	Others <div></div>	0	0.00	0	0.00
	<b>Total</b>	15893364.00	45.04	0.00	0

Total number of shareholders (promoters)

5

## 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	14809595	41.97	0	0.00
	(ii) Non-resident Indian (NRI)	680511	1.93	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	202	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	297225	0.84	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	53648	0.15	0	0.00
9	Body corporate (not mentioned above)	3167367	8.98	0	0.00
10	Others	384590	1.09	0	0.00
	IEPF and LLP				
	<b>Total</b>	19393138.00	54.96	0.00	0

Total number of shareholders (other than promoters)

37088

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

37093.00

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

Sl.No	Category	
1	Individual - Female	10205
2	Individual - Male	26131
3	Individual - Transgender	0
4	Other than individuals	757
	<b>Total</b>	37093.00

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

6

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held
ACADIAN EMERGING MARKETS MICROCAP EQUITY MASTER FUND	STANDARD CHARTERED BANK, SECURITIES SERVICES, 3RD FLOOR 23-25 MAHATMA GANDHI ROAD FORT, MUMBAI 400001	15/04/2021	India	254604	0.72
ACADIAN EMERGING MARKETS SMALL CAP EQUITY FUND, LLC	STANDARD CHARTERED BANK, SECURITIES SERVICES, 3RD FLOOR 23-25 MAHATMA GANDHI ROAD FORT, MUMBAI 400001	28/06/2011	India	18563	0.05
QUADRATURE CAPITAL VECTOR SP LIMITED	C/O A.R.C. Directors Ltd, Suite #7, Grand Pavilion Commercial Centre, P.O. Box 10250, 802 West Bay Road, George Town, KY1-1003, Cayman Islands	22/07/2020	Cayman Islands	6657	0.02
AMERICAN CENTURY ETF TRUST - AVANTIS EMERGING MARKETS EQUITY FUND	DEUTSCHE BANK AG, DB HOUSE, HAZARIMAL SOMANI MARG, P.O.BOX NO. 1142, FORT MUMBAI 400001	17/09/2019	India	5667	0.01
RED BAY LTD	c/o Venture Corporate Services (Mauritius) Limited, Level 3, Tower 1, Nexteracom Towers, Ebene, 72201, Mauritius	13/04/2022	Mauritius	11724	0.03
CITADEL SECURITIES SINGAPORE PTE. LIMITED	12 Marina View, #22-01/02, Asia Square Tower 2, Singapore 018961	15/10/2020	Singapore	10	0.01

**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	5	5
Members (other than promoters)	22904	37088
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
<b>A Promoter</b>	3	0	3	0	11.46	0
<b>B Non-Promoter</b>	0	5	0	4	0.00	0.69
i Non-Independent	0	0	0	0	0	0
ii Independent	0	5	0	4	0	0.69
<b>C Nominee Directors representing</b>	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						
<b>Total</b>	3	5	3	4	11.46	0.69

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

10

### 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)
RAJESH CHANDRESH PARIKH	00041610	Managing Director	2022636	
NARENDRAKUMAR RATILAL PATEL	ADBPP0549B	CFO	2000	
ATIL CHANDRESH PARIKH	AMFPP1595E	CEO	2021661	
ATIL CHANDRESH PARIKH	00041712	Managing Director	2021661	

JAIDEEP BHANUSHANKAR VERMA	00323385	Director	0	
SEJAL RAJESH PARIKH	00140489	Whole-time director	0	
AJAY ISHWARLAL RANKA	01676073	Director	244875	
SIVARAM SWAMINATHAN	00009900	Director	0	
DUKHABANDHU RATH	08965826	Director	0	
KOMAL PANDEY	AJNPT8116A	Company Secretary	0	

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

3

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)
RAMKISAN AMIRCHAND DEVIDAYAL	00238853	Director	12/08/2024	Cessation
ATUL HARIBHAI PATEL	00009587	Director	12/08/2024	Cessation
DUKHABANDHU RATH	08965826	Director	19/07/2024	Change in designation

## 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	19/07/2024	26991	48	47.26

### B BOARD MEETINGS

\*Number of meetings held

5

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	17/05/2024	8	7	87.5
2	26/06/2024	9	8	88.89
3	26/07/2024	9	8	88.89
4	25/10/2024	7	7	100
5	22/01/2025	7	6	85.71

#### C COMMITTEE MEETINGS

Number of meetings held

10

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	17/05/2024	4	3	75
2	Audit Committee	26/06/2024	4	4	100
3	Nomination and remuneration committee	15/05/2024	4	4	100
4	Corporate Social Responsibility Committee	15/05/2024	3	3	100
5	Audit Committee	26/07/2024	4	4	100
6	Audit Committee	25/10/2024	4	4	100
7	Audit Committee	22/01/2025	4	3	75
8	Stakeholders Relationship Committee	25/10/2024	3	3	100
9	Nomination and remuneration committee	20/01/2025	4	3	75
10	Independent Directors Committee Meeting	22/01/2025	4	3	75

#### 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	08/08/2025 (Y/N/NA)
1	SEJAL RAJESH PARIKH	5	5	100	1	1	100	Yes
2	AJAY ISHWARLAL RANKA	5	5	100	6	6	100	Yes
3	RAJESH CHANDRESH PARIKH	5	5	100	9	9	100	Yes
4	ATIL CHANDRESH PARIKH	5	5	100	1	1	100	Yes
5	JAIDEEP BHANUSHANKAR VERMA	5	4	80	4	2	50	Yes
6	SIVARAM SWAMINATHAN	5	4	80	0	0	0	Yes
7	DUKHABANDHU RATH	5	4	80	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

3

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	RAJESH CHANDRESH PARIKH	Managing Director	28596624			4116945	32713569.00
2	ATIL CHANDRESH PARIKH	Managing Director	23308812			3587263	26896075.00
3	SEJAL RAJESH PARIKH	Whole-time director	4484508			422400	4906908.00
	<b>Total</b>		56389944.00	0.00	0.00	8126608.00	64516552.00

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	KOMAL PANDEY	Company Secretary	1116160			89004	1205164.00
2	NARENDRAKUMAR RATILAL PATEL	CFO	3844667			300696	4145363.00
	<b>Total</b>		4960827.00	0.00	0.00	389700.00	5350527.00

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

6

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	RAMKISAN AMIRCHAND DEVIDAYAL	Director	0	700000		165000	865000.00
2	ATUL HARIBHAI PATEL	Director	0	350000		105000	455000.00
3	AJAY ISHWARLAL RANKA	Director	0	350000		240000	590000.00
4	JAIDEEP BHANUSHANKAR VERMA	Director	0	300000		120000	420000.00
5	SIVARAM SWAMINATHAN	Director	0	300000		80000	380000.00
6	DUKHABANDHU RATH	Director	0	0		160000	160000.00
	<b>Total</b>		0.00	2000000.00	0.00	870000.00	2870000.00

#### 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

2

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
20 Microns Limited	NSE	28/11/2023	Regulation 17 (1A) of SEBI (LODR) Regulations, 2015	Fine of Rs. 92,000/- plus GST imposed by each stock exchange (ii) Fine of Rs. 80,000/- plus GST imposed by each stock exchange Fine of Rs. 80,000/- plus GST imposed by each stock exchange	SAT passed the order in the favour of the company. Appeal filed by NSE in Honourable Supreme Court challenging the same on 25/01/2024
20 Microns Limited	The Superintendent of Stamps under The Gujarat Stamp Act, 1958	29/03/2025	Articles 20 and 57 of The Gujarat Stamp Act, 1958	The order mandates payment of Rs. 5,88,680/- comprising stamp duty of Rs. 3,28,680/- and a fine of Rs. 2,60,000/- relating to the transfer of various assets under the Amalgamation and Merger took place in the past.	The management, considering the prolonged pendency of the matter, deemed it advisable not to contest the order. Accordingly, the Company has paid the stamp duty as directed and resolved the matter.

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

37093

#### XIV Attachments

(a) List of share holders, debenture holders

Copy of Details of Shareholder or  
Debenture holder (3).xism

(b) Optional Attachment(s), if any

MGT-8.pdf  
MCA Clarification Letter.pdf  
LOS Part 1.pdf  
LOS Part 2.pdf  
LOS Part 3.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 20 MICRONS 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

UMESH  
GOVINDPRA  
SAD PARIKH

Digitally signed by  
UMESH  
GOVINDPRA  
SAD PARIKH  
Date: 2025.09.26  
17:28:21 +05'30'

Name

Umesh Parikh

Date (DD/MM/YYYY)

26/09/2025

Place

Ahmedabad

Whether associate or fellow:

☐ Associate

☒ Fellow

Certificate of practice number

2\*1\*

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

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

37092

\*(b) Name of the Designated Person

KOMAL PANDEY

#### Declaration

I am authorised by the Board of Directors of the Company vide resolution number\* 9 & 10 dated\* (DD/MM/YYYY) 23/05/2025 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

Atul  
Chandresh  
Parikh

Digitally signed by  
Atul Chandresh  
Parikh  
Date: 2025.09.26  
17:42:39 +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\*0\*1\*1\*

**\*To be digitally signed by**

KOMAL PANDEY  
PANDEY  
Digitally signed by  
KOMAL PANDEY  
Date: 2025.09.26  
17:44:08 +05'30'

☒ Company Secretary ☐ Company secretary in practice

**\*Whether associate or fellow:**

☒ Associate ☐ Fellow

Membership number

3\*0\*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)

AB7402386

eForm filing date (DD/MM/YYYY)

26/09/2025

**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**

**MINISTRY OF CORPORATE AFFAIRS  
RECEIPT  
G.A.R.7**

**SRN:** AB7402386/ BharatKoshOrderId :1-21287708208  
**SRN Date:** 26/09/2025 10:11:49

**Service Request Date:**  
27/09/2025

**RECEIVED FROM:**

**Name:** KOMAL PANDEY

**Address:** Manibhai Park Society, Sayaji Park Society Kamla Nagar, Vadodara, Vadodara, Gujarat, 390019

**ENTITY ON WHOSE BEHALF MONEY IS PAID**

**LLPIN/CIN/DIN:** L99999GJ1987PLC009768

**Name:** 20 MICRONS LIMITED

**Address:** 9-10, G.I.D.C. INDUSTRIAL ESTATE, WAGHODIA,, , BARODA, , Gujarat, 391760

**FULL PARTICULARS OF REMITTANCE**

**Service Type:** eFiling

Service Description	Type of Fee	Amount (Rs.)
Fee for MGT-7	Normal	600
	Additional	0
<b>Total</b>		<b>600</b>

**Mode of Payment:** Online

**Received Payment Rupees:** Six Hundred Rupees Only.

Note: The defects or incompleteness in any respect in this application as noticed shall be placed on the Ministry's website(www.mca.gov.in). In case the application is marked as RSUB, please resubmit the application within the due date. Please track the status of your transaction at all times till it is finally disposed off. (please refer Rule 10 of the Companies (Registration offices and Fees) Rules, 2014)