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]

सत्यमेव जयते

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) — L27100MH1984PLC034003

ii (a) *Financial year for which the annual return is being filed (From date) (DD/MM/YYYY) — 01/04/2025

(b) *Financial year for which the annual return is being filed (To date) (DD/MM/YYYY) — 31/03/2026

(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	SUNFLAG IRON AND STEEL CO LTD	SUNFLAG IRON AND STEEL CO LTD
Registered office address	33/1, Mount Road,Sadar,Sadar Bazar (Nagpur),Nagpur,Nagpur,Maharashtra,India,440 001	33/1, Mount Road,Sadar,Sadar Bazar (Nagpur),Nagpur,Nagpur,Maharashtra,India,440 001
Latitude details	21.160577	21.160577
Longitude details	79.077199	79.077199

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

(b) *Permanent Account Number (PAN) of the company — AA******6C

(c) *e-mail ID of the company — *****tor@sunflagsteel.com

(d) *Telephone number with STD code — 07*******61

(e) Website | www.sunflagsteel.com

iv *Date of Incorporation (DD/MM/YYYY) | 12/09/1984

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)
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
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	INR000001385

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

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

(c) Due date of AGM (DD/MM/YYYY) | 30/09/2026

(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

NA

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	C	Manufacturing	24	Manufacture of basic metals	100

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

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

8

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Joint Venture	% of shares held
1	U31200UR2003PLC027802		SUNFLAG POWER LIMITED	Subsidiary	100
2	U10100MH2009PTC191907		KHAPPA COAL COMPANY PRIVATE LIMITED	Subsidiary	63.27
3	U74999MH2017NPL289961		SUNFLAG FOUNDATION	Subsidiary	100
4	U10100JH2008PTC013329		C T MINING PRIVATE LIMITED	Joint Venture	31.8
5	U10101CT2007PTC020161		MADANPUR (NORTH) COAL BLOCK PRIVATE LIMITED	Joint Venture	11.73
6	U28113HR2015FTC054839		DAIDO D.M.S. INDIA PRIVATE LIMITED	Joint Venture	17.56

7	U28999MH2016PTC287281		RAMESH SUNWIRE PRIVATE LIMITED	Joint Venture	49
8	U40106DL2022PTC400111		RENEW GREEN (MPR THREE) PRIVATE LIMITED	Associate	31.2

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	205000000.00	180219448.00	180219448.00	180219448.00
Total amount of equity shares (in rupees)	2050000000.00	1802194480.00	1802194480.00	1802194480.00

Number of classes: 1

Class of shares Equity Shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	205000000	180219448	180219448	180219448
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	2050000000.00	1802194480.00	1802194480	1802194480

(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	68455454	111763994	180219448.00	1802194480	1802194480	
Increase during the year	0.00	1309182.00	1309182.00	13091820.00	13091820.00	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 Dematerialisation of Physical Shareholding	0	1309182	1309182.00	13091820	13091820	
Decrease during the year	1309182.00	0.00	1309182.00	13091820.00	13091820.00	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 Dematerialisation of Physical Shareholding	1309182	0	1309182.00	13091820	13091820	
At the end of the year	67146272.00	113073176.00	180219448.00	1802194480.00	1802194480.00	
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	
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			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	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company | INE947A01014

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

33823192866

ii * Net worth of the Company

85364794246

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	1612140	0.89	0	0.00
	(ii) Non-resident Indian (NRI)	16807679	9.33	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)	8521425	4.73	0	0.00
10	Others Foreign Body Corpora	65253582	36.21	0	0.00
	Total	92194826.00	51.16	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	60307367	33.46	0	0.00
	(ii) Non-resident Indian (NRI)	464812	0.26	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	560	0.00	0	0.00
5	Financial institutions	40800	0.02	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	32787	0.02	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	21745337	12.07	0	0.00
10	Others IEPF, CM, EA,Trust	5432959	3.01		
	Total	88024622.00	48.84	0.00	0

Total number of shareholders (other than promoters) 57165

Total number of shareholders (Promoters + Public/Other than promoters) 57170.00

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

Sl.No	**Category**	
1	Individual - Female	0
2	Individual - Male	56926
3	Individual - Transgender	0
4	Other than individuals	244
	Total	57170.00

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	5	5
Members (other than promoters)	64616	57165
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	0.89	7.33
B Non-Promoter	1	6	1	4	0.00	0.00
i Non-Independent	1	0	1	0	0	0
ii Independent	0	6	0	4	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	8	2	6	0.89	7.33

*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)**
RAVI BHUSHAN SATYA DEV BHARDWAJ	00054700	Director	0	
MATTEGUNTA GOUTHAM ANJANI VENKATRAMANA	00101447	Director	0	
PRANAV RAVI BHARDWAJ	00054805	Managing Director	1612140	
SUHRIT RAVI BHUSHAN BHARDWAJ	02318190	Director	13217398	
RAMCHANDRA VASANT DALVI	00012065	Whole-time director	0	
ANAND SADASHIV KAPRE	00019530	Director	26	
TIRTHNATH JHA INDRANATH	07593002	Director	0	
VINITA BAHRI	03109454	Director	0	
SRINIVASAN MAHADEVAN IYER	AACPI7334M	CFO	0	
ASHUTOSH MISHRA	AFDPM4265M	Company Secretary	0	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year: 6

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)**
NEELAM NARESH KOTHARI	06709241	Director	20/09/2025	Cessation
SAJIV DHAWAN	00160085	Director	10/08/2025	Cessation
VINITA BAHRI	03109454	Director	21/09/2025	Appointment

MATTEGUNTA GOUTHAM ANJANI VENKATRAMANA	00101447	Director	12/08/2025	Appointment
TIRTHNATH JHA INDRANATH	07593002	Director	03/09/2025	Appointment
PRANAV RAVI BHARDWAJ	00054805	Managing Director	17/01/2026	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	26/09/2025	64777	57	74.69

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	27/05/2025	10	10	100
2	21/07/2025	10	8	80
3	11/08/2025	9	8	88.89
4	13/11/2025	8	7	87.5
5	13/02/2026	8	7	87.5

C COMMITTEE MEETINGS

Number of meetings held: 34

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	27/05/2025	4	3	75
2	Audit Committee	21/07/2025	4	3	75
3	Audit Committee	11/08/2025	3	3	100
4	Audit Committee	13/11/2025	4	4	100
5	Audit Committee	13/02/2026	4	4	100
6	Nomination and Remuneration Committee	27/05/2025	4	4	100
7	Nomination and Remuneration Committee	21/07/2025	4	4	100
8	Nomination and Remuneration Committee	11/08/2025	4	4	100
9	Nomination and Remuneration Committee	13/02/2026	4	3	75
10	Corporate Social Responsibility Committee	27/05/2025	5	4	80
11	Corporate Social Responsibility Committee	11/08/2025	4	3	75
12	Corporate Social Responsibility Committee	13/11/2025	5	4	80
13	Corporate Social Responsibility Committee	13/02/2026	5	5	100
14	Corporate Social Responsibility Committee	14/03/2026	5	4	80
15	Risk Management Committee	11/08/2025	3	3	100
16	Risk Management Committee	13/02/2026	4	4	100
17	Project Monitoring Committee	13/11/2025	4	3	75
18	Project Monitoring Committee	13/03/2026	4	4	100

19	Share Transfer Committee	27/05/2025	4	4	100
20	Share Transfer Committee	11/08/2025	4	4	100
21	Share Transfer Committee	13/11/2025	4	4	100
22	Share Transfer Committee	13/02/2026	4	4	100
23	Stakeholders Relationship Committee	27/05/2025	4	4	100
24	Stakeholders Relationship Committee	11/08/2025	4	4	100
25	Stakeholders Relationship Committee	13/11/2025	4	3	75
26	Stakeholders Relationship Committee	13/02/2026	4	4	100
27	Sub-committee of Board	24/04/2025	4	4	100
28	Sub-committee of Board	06/06/2025	4	4	100
29	Sub-committee of Board	11/07/2025	4	4	100
30	Sub-committee of Board	04/08/2025	4	3	75
31	Sub-committee of Board	19/08/2025	4	3	75
32	Sub-committee of Board	10/09/2025	4	3	75
33	Sub-committee of Board	17/10/2025	4	3	75
34	Sub-committee of Board	08/12/2025	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**	(Y/N/NA)
1	MATTEGUNTA GOUTHAM ANJANI VENKATRAMANA	5	5	100	20	16	80	
2	PRANAV RAVI BHARDWAJ	5	5	100	18	16	88	
3	SUHRIT RAVI BHUSHAN BHARDWAJ	5	2	40	0	0	0	

4	RAMCHANDRA VASANT DALVI	5	5	100	25	25	100	
5	ANAND SADASHIV KAPRE	5	5	100	16	16	100	
6	TIRTHNATH JHA INDRANATH	5	5	100	2	2	100	
7	VINITA BAHRI	5	4	80	28	25	89	
8	RAVI BHUSHAN SATYA DEV BHARDWAJ	5	5	100	17	15	88	

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

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	PRANAV RAVI BHARDWAJ	Managing Director	32893522	28332789	0	0	61226311.00
2	RAMCHANDRA VASANT DALVI	Whole-time director	19622670	0	0	0	19622670.00
	Total		52516192.00	28332789.00	0.00	0.00	80848981.00

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	SRINIVASAN MAHADEVAN IYER	CFO	10715756	0	0	0	10715756.00
2	ASHUTOSH MISHRA	Company Secretary	7231495	0	0	0	7231495.00
	Total		17947251.00	0.00	0.00	0.00	17947251.00

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

7

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	RAVI BHUSHAN SATYA DEV BHARDWAJ	Director	0	11131824	0	0	11131824.00

2	ANAND SADASHIV KAPRE	Director	0	350000	0	174000	524000.00
3	MATTEGUNTA ANJANI VENKATRAMANA GOUTHAM	Director	0	350000	0	174000	524000.00
4	SAJIV DHAWAN	Director	0	350000	0	22000	372000.00
5	VINITA BAHRI	Director	0	350000	0	187000	537000.00
6	NEELAM NARESH KOTHARI	Director	0	350000	0	94000	444000.00
7	TIRTHNATH JHA INDRANATH	Director	0	350000	0	104000	454000.00
	Total		0.00	13231824.00	0.00	755000.00	13986824.00

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: 57170

XIV Attachments

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

(b) Optional Attachment(s), if any:

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 SUNFLAG IRON AND STEEL CO LTD 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) 31/03/2026

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	CS Rachana Daga
Date (DD/MM/YYYY)	21/08/2026
Place	Nagpur

Whether associate or fellow:

○ Associate ● Fellow

Certificate of practice number	5*7*

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

*(a) DIN/PAN/Membership number of Designated Person	AFDPM4265M
*(b) Name of the Designated Person	ASHUTOSH MISHRA

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 18(B)(xiv) dated*

(DD/MM/YYYY) | 09/02/2024 | 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*0*2*6*

***To be digitally signed by**

(●) Company Secretary ( ) Company secretary in practice

*Whether associate or fellow:

(●) Associate ( ) Fellow

Membership number | 2*0*1

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) | AC5441119

eForm filing date (DD/MM/YYYY) | 21/08/2026

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