

**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)

L74100TG1999PLC031191

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	STEEL EXCHANGE INDIA LIMITED	STEEL EXCHANGE INDIA LIMITED
Registered office address	D.NO:1-65/K/60, Plot No:60 Abhis Hiranya, 1ST Floor, Kavuri Hills,,NA,Hyderabad,Telangana,India,500081	D.NO:1-65/K/60, Plot No:60 Abhis Hiranya, 1ST Floor, Kavuri Hills,,NA,Hyderabad,Telangana,India,500081
Latitude details	17.44166	17.44166
Longitude details	78.39838	78.39838

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

Photos1.pdf

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

AA\*\*\*\*\*2L

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

\*\*\*\*\*INDRA.SEIL@GMAIL.COM

(d) \*Telephone number with STD code

04\*\*\*\*\*25

(e) Website

www.seil.co.in

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

24/02/1999

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
U65993TG1986PTC006936	VENTURE CAPITAL AND CORPORATE INVESTMENTS PRIVATE LTD.	Door No. 4-50/P-II/57/4 & 5th Floors, Plot No. 57,, Jayabheri Enclave, Phase II, Gachibowli,,Seri Lingampally,Hyderabad,Telangan,India,500032	INR00000120

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

Yes

No

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

29/09/2025

(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

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	25	Manufacture of fabricated metal products, except machinery and equipment	91.17
2	G	Wholesale and retail trade; repair of motor vehicles and motorcycles	46	Wholesale trade, except of motor vehicles and motorcycleS	6.8
3	D	Electricity, gas, steam and air condition supply	35	Electric power generation, transmission and distribution	2.03

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

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

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held

**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	2580000000.00	1197633270.00	1197633270.00	1197633270.00
Total amount of equity shares (in rupees)	2580000000.00	1197633270.00	1197633270.00	1197633270.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Eq				
Number of equity shares	2580000000	1197633270	1197633270	1197633270
Nominal value per share (in rupees)	1	1	1	1
Total amount of equity shares (in rupees )	2580000000.00	1197633270.00	1197633270	1197633270

**(b) Preference share capital**

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	74000000.00	18608750.00	18608750.00	18608750.00
Total amount of preference shares (in rupees)	74000000.00	18608750.00	18608750.00	18608750.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Preference				

Number of preference shares	74000000	18608750	18608750	18608750
Nominal value per share (in rupees)	10	10	10	10
Total amount of preference shares (in rupees )	740000000.00	186087500.00	186087500	186087500

**(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>	2523080	1195110190	1197633270.00	1197633270	1197633270	
<b>Increase during the year</b>	0.00	27720.00	27720.00	27720.00	27720.00	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	
x Others, specify						
Conversion of Physical shares in to Demat	0	27720	27720.00	27720	27720	
<b>Decrease during the year</b>	27720.00	0.00	27720.00	27720.00	27720.00	0
i Buy-back of shares	0	0	0.00	0	0	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify Demat Conversion	27720	0	27720.00	27720	27720	
<b>At the end of the year</b>	2495360.00	1195137910.00	1197633270.00	1197633270.00	1197633270.00	
<b>(ii) Preference shares</b>						
<b>At the beginning of the year</b>	18608750	0	18608750.00	186087500	186087500	
<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			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			0			
<b>At the end of the year</b>	18608750.00	0.00	18608750.00	186087500.00	186087500.00	

ISIN of the equity shares of the company

INE503B01021

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

13

**Attachments:**

1. Details of shares/Debentures Transfers

steel Transfer Details-VCC IPL.xlsm

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

**(a) Non-convertible debentures**

\*Number of classes

1

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
1	4828	704769.77	3402628449.56
<b>Total</b>	4828.00	704769.77	3402628449.56

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
1	3739152192	0	336523742.44	3402628449.56
<b>Total</b>	3739152192.00	0.00	336523742.44	3402628449.56

**(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)
<b>Total</b>			

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
<b>Total</b>				

**(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)
<b>Total</b>			

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
<b>Total</b>				

**(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	3739152192.00	0.00	336523742.44	3402628449.56
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>	3739152192.00	0.00	336523742.44	3402628449.56

**v Securities (other than shares and debentures)**

1

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Warrants	111025142	1	111025142	0.25	27756285.5
<b>Total</b>	111025142		111025142		27756285.5

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

i \*Turnover

11440226000

ii \* Net worth of the Company

7059769000

**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	142605380	11.91	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)	490990170	41.00	18608750	100.00
10	Others <input type="text"/>	0	0.00	0	0.00
	<b>Total</b>	633595550.00	52.91	18608750.00	100

Total number of shareholders (promoters)

**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	379578715	31.69	0	0.00
	(ii) Non-resident Indian (NRI)	6605761	0.55	0	0.00
	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	3093420	0.26	0	0.00
	(ii) State Government	60	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	510	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	35370	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	147153541	12.29	0	0.00
10	Others	27570343	2.30	0	0.00
	AIF, FPI, Trust				
	<b>Total</b>	564037720.00	47.09	0.00	0

Total number of shareholders (other than promoters)

315103

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

315119.00

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

Sl.No	Category	
1	Individual - Female	57555
2	Individual - Male	257101
3	Individual - Transgender	0
4	Other than individuals	463
	<b>Total</b>	315119.00

**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	16	16
Members (other than promoters)	270125	315103
Debenture holders	30	31

## 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	2	3	0	3.98	0
<b>B Non-Promoter</b>	0	7	0	4	0.00	0.00
i Non-Independent	0	0	0	0	0	0
ii Independent	0	7	0	4	0	0
<b>C Nominee Directors representing</b>	0	1	0	1	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	1	0	1	0	0
<b>Total</b>	3	10	3	5	3.98	0.00

\*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)
SATISH KUMAR BANDI	00163676	Managing Director	6459440	
SURESH KUMAR BANDI	00206473	Whole-time director	40040520	
BANDI MOHIT SAI KUMAR	07410118	Whole-time director	0	
NAGOJI RAM MOHAN	02895361	Nominee Director	0	
SIVA SAGAR RAO YENDAMURI	00210188	Director	0	
VEERA BRAHMA RAO AREKAPUDI	07540040	Director	0	
SUBBARAO MUNNANG	06495576	Director	0	
BHAGYAM RAMANI	00107097	Director	0	
BRAHMAIAH TELAPROLU	ABFPT1854K	CFO	0	
RAVEENDRA BABU MANNEM	BJTPM5881Q	Company Secretary	0	

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

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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)
SHYAM JAGETIYA	02581262	Nominee Director	01/04/2024	Cessation
NAGOJI RAM MOHAN	02895361	Nominee Director	03/05/2024	Appointment
MALLIKARJUNA RAO MEDIBOINA	ASVPM3348Q	CFO	03/05/2024	Appointment
VEERAMACHANENI VENKATA KRISHNA RAO	00206884	Director	15/10/2024	Cessation
SURESH BAVINENI	00181832	Director	15/10/2024	Cessation
SUBBARAO MUNNANG	06495576	Director	18/12/2024	Appointment
MALLIKARJUNA RAO MEDIBOINA	ASVPM3348Q	CFO	18/12/2024	Cessation
BRAHMAIAH TELAPROLU	ABFPT1854K	CFO	18/12/2024	Appointment

RAMINENI RAMACHANDRA RAO	00226945	Director	31/12/2024	Cessation
KODALI KRISHNARAO	00382726	Director	31/12/2024	Cessation
SIVAPRASAD CHIVUKULA	01904785	Director	31/12/2024	Cessation
SUJATA CHATTOPADHYAY	02336683	Director	27/03/2025	Cessation

## IX MEETINGS OF MEMBERS/CLASS OF MEMBERS/ BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

### A MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS

\*Number of meetings held

2

Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
25th Annual General Meeting	27/09/2024	298055	65	40.1
Extraordinary General Meeting	10/01/2025	308729	61	30.61

### B BOARD MEETINGS

\*Number of meetings held

6

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	03/05/2024	13	11	84.62
2	31/07/2024	13	12	92.31
3	29/08/2024	13	13	100
4	17/10/2024	11	11	100
5	18/12/2024	11	11	100
6	24/01/2025	9	8	88.89

**C COMMITTEE MEETINGS**

Number of meetings held

14

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	03/05/2024	3	3	100
2	Audit Committee	31/07/2024	3	3	100
3	Audit Committee	29/08/2024	3	3	100
4	Audit Committee	17/10/2024	3	3	100
5	Audit Committee	18/12/2024	3	2	66.67
6	Audit Committee	24/01/2025	3	2	66.67
7	Audit Committee	26/03/2025	3	2	66.67
8	Nomination and Remuneration Committee	03/05/2024	3	2	66.67
9	Nomination and Remuneration Committee	18/12/2024	3	2	66.67
10	Nomination and Remuneration Committee	24/01/2025	3	2	66.67
11	Stakeholders Relationship Committee	26/03/2025	3	3	100
12	Corporate Social Responsibility Committee	26/03/2025	3	3	100
13	Risk Management Committee	08/07/2024	3	2	66.67
14	Risk Management Committee	24/01/2025	3	2	66.67

**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	29/09/2025 (Y/N/NA)
1	SATISH KUMAR BANDI	6	6	100	4	4	100	Yes
2	SURESH KUMAR BANDI	6	6	100	4	4	100	Yes
3	BANDI MOHIT SAI KUMAR	6	6	100	0	0	0	Yes
4	NAGOJI RAM MOHAN	4	4	100	0	0	0	Yes
5	SIVA SAGAR RAO YENDAMURI	6	6	100	2	1	50	Yes
6	VEERA BRAHMA RAO AREKAPUDI	6	6	100	3	3	100	Yes
7	SUBBARAO MUNNANG	1	1	100	3	3	100	Yes
8	BHAGYAM RAMANI	6	5	83	3	1	33	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	Bandi Satish Kumar	Managing Director	9075000	0	0	1320062	10395062.00
2	Bandi Suresh Kumar	Whole-time director	8400000	0	0	840000	9240000.00
3	Bandi Mohit Sai Kumar	Whole-time director	6000000	0	0	0	6000000.00
	<b>Total</b>		23475000.00	0.00	0.00	2160062.00	25635062.00

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

3

S. No.	Name	Designation	Gross salary	Commission	Stock Option/Sweat equity	Others	Total amount
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1	M.Mallikarjuna Rao	CFO	1780000	0	0	0	1780000.00
2	Brahmaiah Telaprolu	CFO	1288524	0	0	0	1288524.00
3	Raveendra Babu Mannem	Company Secretary	2482452	0	0	0	2482452.00
	<b>Total</b>		5550976.00	0.00	0.00	0.00	5550976.00

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

9

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	R Ramachandra Rao	Director	200000	0	0	0	200000.00
2	K Krishna Rao	Director	250000	0	0	0	250000.00
3	CH.Siva Prasad	Director	250000	0	0	0	250000.00
4	Sujatha Chattopadhyay	Director	300000	0	0	0	300000.00
5	Y.Siva Sagar Rao	Director	300000	0	0	0	300000.00
6	A.Veera Brahma Rao	Director	300000	0	0	0	300000.00
7	Bhagyam Ramani	Director	250000	0	0	0	250000.00
8	Ram Mohan Nagoji	Nominee Director	150000	0	0	0	150000.00
9	M.V.Subba Rao	Director	50000	0	0	0	50000.00
	<b>Total</b>		2050000.00	0.00	0.00	0.00	2050000.00

#### 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

315119

### XIV Attachments

(a) List of share holders, debenture holders

STEEL EXCHANGE INDIA LIMITED  
Details of Shareholder or  
Debenture holder  
31032025B.xlsm  
STEEL EXCHANGE INDIA LIMITED  
Details of Shareholder or  
Debenture holder  
31032025A.xlsm  
STEEL EXCHANGE INDIA LIMITED  
Details of Shareholder or  
Debenture holder  
31032025C.xlsm  
Details of Shareholder or  
Debenture holder.xlsm

(b) Optional Attachment(s), if any

SEIL - List of Debenture Holders  
31.03.2025.xlsx  
SEIL-MGT-8-2025.pdf  
Clarification Letter-signed.pdf

## XV COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

### I/We certify that:

- (a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
- (b) Unless otherwise expressly stated to the contrary elsewhere in this return, the Company has complied with applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of 

STEEL EXCHANGE INDIA LIMITED
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 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
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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

S SRIKANTH

Date (DD/MM/YYYY)

19/12/2025

Place

Hyderabad

Whether associate or fellow:

Associate  Fellow

Certificate of practice number

7\*9\*

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

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

BJTPM5881Q

\*(b) Name of the Designated Person

RAVEENDRA BABU MANNEM

**Declaration**

I am authorised by the Board of Directors of the Company vide resolution number\*  dated\*

(DD/MM/YYYY)  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\*1\*3\*7\*

**\*To be digitally signed by**

Company Secretary       Company secretary in practice

**\*Whether associate or fellow:**

Associate       Fellow

Membership number

3\*4\*9

Certificate of practice number

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**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)

AC0061999

eForm filing date (DD/MM/YYYY)

29/12/2025

**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**