

**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)

U45300GJ1948PLC001115

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	SINDHU RESETTLEMENT CORPN LIMITED	SINDHU RESETTLEMENT CORPN LIMITED
Registered office address	ADIPUR,NA,KUTCH,Gujarat,India,370201	ADIPUR,NA,KUTCH,Gujarat,India,370201
Latitude details	23.074236	23.074236
Longitude details	70.096031	70.096031

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

PHOTOS.pdf

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

AA\*\*\*\*\*5P

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

\*\*\*\*\*indhu-src.org

(d) \*Telephone number with STD code

02\*\*\*\*\*03

(e) Website

www.sindhu-src.org

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

v (a) \*Class of Company (as on the financial year end date)  
(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 guarantee/Unlimited company)

(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)

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

viii Number of Registrar and Transfer Agent

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
U72400MH2004PLC147094	NSDL DATABASE MANAGEMENT LIMITED	4th Floor, Tower 3, One International Center, Senapati Bapat Marg, Prabhadevi, Mumbai - 400 013, Delisle Road, Mumbai, Mumbai, Maharashtra, India, 400013	

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)

(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

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## II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i \*Number of business activities

2

S. No.	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	L	Real Estate activities	68	Real Estate activities	93.52
2	N	Administrative and support service activities	82	Office administrative, office support and other business support activities	6.48

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

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

0

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	25000	20000	15470	15470
Total amount of equity shares (in rupees)	25000000.00	20000000.00	15470000.00	15470000.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
EQUITY SHARES				
Number of equity shares	25000	20000	15470	15470
Nominal value per share (in rupees)	1000	1000	1000	1000
Total amount of equity shares (in rupees )	25000000.00	20000000.00	15470000.00	15470000.00

**(b) Preference share capital**

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

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			
<b>(i) Equity shares</b>						
<b>At the beginning of the year</b>	14722	747	15469.00	15469000	15469000	
<b>Increase during the year</b>	1.00	233.00	234.00	234000.00	234000.00	
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  AMT RECEIVED ON FORFITED RE-ISSUE & CONVERTED TO DEMAT	1	233	234.00	234000	234000	
<b>Decrease during the year</b>	233.00	0.00	233.00	233000.00	233000.00	
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  Conversion from Physical to Demat	233	0	233.00	233000	233000	
<b>At the end of the year</b>	14490.00	980.00	15470.00	15470000.00	15470000.00	
<b>(ii) Preference shares</b>						

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
<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	
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 <input type="text" value="NA"/>	0	0	0.00	0	0	
<b>Decrease during the year</b>	0.00	0.00	0.00	0.00	0.00	
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 <input type="text" value="NA"/>	0	0	0.00	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

ii Details of stock split/consolidation during the year (for each class of shares)

Class of shares		<input type="text"/>
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

49

**Attachments:**

1. Details of shares/Debentures Transfers

Transfer Details.xlsm

**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)
<b>Total</b>			

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
<b>Total</b>				

**(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				
Partly convertible debentures				
Fully convertible debentures				
<b>Total</b>				

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

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>	0.00		0.00		0.00

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

i \*Turnover

45070607

ii \* Net worth of the Company

813600313

**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	274	1.77	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	5000	32.32	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)	0	0.00	0	0.00

10	Others <input type="text"/>	0	0.00	0	0.00
	<b>Total</b>	5274.00	34.09	0.00	0.00

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	9650	62.38	0	0.00
	(ii) Non-resident Indian (NRI)	70	0.45	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	9	0.06	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)	135	0.87	0	0.00

10	Others Trust,Society ,NTC	332	2.15	0	0.00
	<b>Total</b>	10196.00	65.91	0.00	0.00

Total number of shareholders (other than promoters)

7136

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

7162.00

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

Sl.No	Category	
1	Individual - Female	2044
2	Individual - Male	4869
3	Individual - Transgender	0
4	Other than individuals	249
	<b>Total</b>	7162.00

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	22	26
Members (other than promoters)	7145	7136
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>	0	8	0	5	0	0.65
<b>B Non-Promoter</b>	0	0	0	0	0.00	0.00
i Non-Independent	0	0	0	0	0	0
ii Independent	0	0	0	0	0	0
<b>C Nominee Directors representing</b>	0	2	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	2	0	1	0	0
iv Small share holders	0	0	0	0	0	0
v Others	0	0	0	0	0	0
<b>Total</b>	0	10	0	6	0.00	0.65

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

6

## 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)
NARESH HANSRAJ BULCHANDANI	00938642	Director	20	
SHEWAK NATHURMAL LAKHWANI	06393857	Director	13	
HARISH PERUNMAL KALYANI	02836806	Director	11	
PREM SOBHRAJMAL LALWANI	03152002	Director	6	
VELKURU RAVEENDRA REDDY	10938889	Nominee Director	0	

NILESH MAHASHANKAR PANDYA	10312936	Director	5	
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**B (ii) \*Particulars of change in director(s) and Key managerial personnel during the year**

8

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)
SURESH RAMCHAND NIHALANI	02836796	Director	30/12/2024	Cessation
SHEWAK NATHURMAL LAKHWANI	06393857	Director	30/12/2024	Appointment
RAMESHWAR KUMAR	08862428	Nominee Director	08/05/2024	Cessation
NANDEESH SHUKLA	08862427	Nominee Director	20/02/2025	Cessation
RAVINDRABHAI PURSHOTTAMBHAI PATEL	00357482	Director	06/11/2024	Cessation
PRITIDEVI KUTCH	02099581	Director	13/11/2024	Cessation
ARUNA SURESH JAGTIANI	01151817	Director	10/02/2025	Cessation
VELKURU RAVEENDRA REDDY	10938889	Nominee Director	28/03/2025	Appointment

**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
AGM	30/12/2024	7165	138	1.61

**B BOARD MEETINGS**

\*Number of meetings held

7

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	23/04/2024	10	6	60.00
2	22/07/2024	9	5	55.56
3	22/08/2024	9	6	66.67
4	27/11/2024	7	6	85.71
5	15/01/2024	7	6	85.71
6	20/02/2025	5	5	100.00
7	10/03/2025	5	4	80.00

#### C COMMITTEE MEETINGS

Number of meetings held

5

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	Executive Committee Meetings	28/05/2024	8	4	50.00
2	Executive Committee Meetings	26/06/2024	8	5	62.50
3	Executive Committee Meetings	30/10/2024	8	7	87.50
4	Executive Committee Meetings	07/02/2024	6	5	83.33
5	Stakeholder Committee Meeting	27/03/2025	3	2	66.67

#### D ATTENDANCE OF DIRECTORS

S. N o	Name of the Director	Board Meetings	Committee Meetings	Whether attended AGM held on
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		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	19/10/2025 (Y/N/NA)
1	NARESH HANSRAJ BULCHANDANI	7	7	100.00	5	4	80.00	Yes
2	SHEWAK NATHURMAL LAKHWANI	3	3	100.00	1	1	100.00	Yes
3	HARISH PERUNMAL KALYANI	7	6	85.71	5	4	80.00	Yes
4	PREM SOBHRAJMAL LALWANI	7	7	100.00	5	4	80.00	Yes
5	VELKURU RAVEENDRA REDDY	0	0	0.00	0	0	0.00	Not applicable
6	NILESH MAHASHANKAR PANDYA	7	7	100.00	4	4	100.00	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

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

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

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

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

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

	<b>Total</b>						

**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

OBSERVATION AND RESPONSE ARE ATTACHED IN OPTIONAL ATTACHMENT.

**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

**XIV Attachments**

(a) List of share holders, debenture holders

Details of Shareholder or  
Debenture holder.xlsm

(b) Optional Attachment(s), if any

LIST OF DIRECTOR AND  
CLARIFICATION LETTER.pdf  
AUDITOR OBSERVATION.pdf  
UDIN\_MGT-7\_SRC.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  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)

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

Date (DD/MM/YYYY)

Place

Whether associate or fellow:

- Associate       Fellow

Certificate of practice number

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

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

06393857

\* (b) Name of the Designated Person

SHEWAK NATHURMAL LAKHWANI

**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))*

**\*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator**

**\*To be digitally signed by**

Company Secretary       Company secretary in practice

**\*Whether associate or fellow:**

Associate       Fellow

Membership number

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)

eForm filing date (DD/MM/YYYY)

**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**



# THE SINDHU RESETTLEMENT CORPORATION LTD.

Regd. Office: ADIPUR (KUTCH) GUJARAT.

CIN # U45300GJ1948PLC001115

Phone: (02836) 260403 -- Email: src@sindhu-src.org Web Site: www.sindhu-src.org

## Observation of Independent Auditor's Report:

SR NO.	Observation of Independent Auditor's Report:	SRC Response:
1.	<p>I. Non-compliance of Head Lease Deed conditions:</p> <p>SRC has allotted 18.41 acres of land for commercial purpose out of a total of 100 acres without obtaining specific prior approval from Deendayal port authority/ Government for allotting the land on leave and license basis or on joint venture basis or on Development agreement basis.</p> <p>Moreover, there are three instances where plots were allotted without allotment of shares which is violation of clause 5 (ii) on page no. 4 and 5 of the head lease deed.</p>	<p>SRC had allotted 18,41 acres of land out of 100 Acres of Land retained by the Corporation before the year 2017. A special Audit was conducted in the year 2017 for Financial Year 1948 to 2017 wherein the Auditors had recommended that SRC not to allow use of land on JV or Development Agreement basis in future without prior approval of the Government. It is pertinent to note that since 2017, SRC has not allowed use of any piece of land out of the hundred acres under Joint Venture or Development Agreement. Moreover, the proposal has now been forwarded to DPA for its approval of Development Agreement Scheme on behalf of Government of India.</p> <p>The Board clarifies that appropriate Action is being taken by the Corporation to issue shares and regularize the allotment of plot as per the Policy decision.</p>
2.	<p>II. Non - compliance of Sub lease deed conditions:</p> <p>i) As per clause 1(ii) of the sub lease deed entered into between the SRC and sub leaseholder "the lessee shall build upon the said plot within a period of 2/3/5/7 or 10 years from the date of execution of the sub lease deed. Out of total 15,015 plots, 3116 plots representing 20.63% remain unconstructed despite the expiration of the permitted construction period.</p>	<p>The Board clarifies that taking into consideration the numerous requests from leaseholders and various factors, the Board of Directors of SRC has recommended to DPA to grant further extension for the period of 3 years to the lessees of unconstructed plots in the interest of the leaseholders of the township.</p> <p>But the required approval from DPA is still awaited. Further, the matter is being coordinated with the concerned authorities of Deendayal Port Authority (DPA) to frame suitable scheme to resolve the issue</p>
3.	<p>III. Non - compliance of Sub lease deed conditions:</p> <p>ii) As per the clause 1(xii) of the sub lease deed entered into between the SRC and sub-leaseholder "Lessee shall use the said land and building that may be erected thereon during the said term, only for the purpose for which the same is allotted. In case of any change in the use thereof previous approval in writing of the lessor and Government shall be obtained. In this context, it is noted that several properties/plots are being used for commercial purposes which was originally allotted for residential purposes. However, SRC has not carried out a detailed review of such deviations as well as not taken any action to regularize the same. Hence, we are unable to comment on the quantum of the same.</p>	<p>The Board clarifies that looking to the representations received from the various Plot holders requesting for change in use of their plots from Residential to Commercial, a proposal was considered by the Board of Directors of the SRC in its meeting held on 08/07/2025 wherein it was decided to forward a proposal to DPA for amending the Master Plan of Adipur - Gandhidham Township by converting Residential Plots along the three roads viz. Tagore Road, Rampath Road and Aerodrome Road into Commercial Plots. Approval from DPA is still awaited. However, the DPA assured that the proposal will be reviewed and processed expeditiously.</p>





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4.	<p>IV. Virgin share transmission: Out of total of 15,467 shares of SRC, 189 shares remain "Virgin" means against which plots yet not allotted. Further to that, extract of special audit report related to non-alignment of share transfer and plot transfer activities are as under:</p> <p>"We have observed that the share transfer and plot transfer activities at SRC are not aligned with each other. Since original purpose of share allotment was to allot plot to shareholders, plot transfer and share transfer should occur simultaneously. As a result of nonalignment of plots and shares, a situation has arisen where a plot holder may no longer be a shareholder of SRC, and conversely, a shareholder may not necessarily be a plot holder of SRC. We have not found any specific regulation, granting the company the power to conduct isolated transfer of shares and plots.</p> <p>The issue may lead to certain abnormalities, one of which is that, there is a possibility that individuals or groups with vested interest in the affairs of SRC could corner shares of the Corporation. In fact, we have doubt that such a situation might already be occurring.</p> <p>Since this practice has been in place for a long time, finding a solution to this issue is challenging and will require thorough deliberation."</p>	<p>The Board clarifies that the issue of non-alignment of share and plot is decades old and as such continued. Further direction of DPA/ Govt. of India will be followed.</p>
5.	<p>V. In case of Allotment of land in DC-2 for cinema purpose, after completion of 5 years i.e. 31.08.2011 the license fees were due for upward revaluation of 20% w.e.f. 01.09.2011. The executive committee of directors vide resolution no.8536 held on 16.05.2011 resolved and approved the recommendations of sub-committee to accept license fees in lump sum amount of Rs. 2,34,12,514/- for residue period of time for 25 years violating letter of allotment of lease and license for a period of 5 year subject to further extensions of 5 years. Further to that, we would like to report that the management has adopted such kind of approaches and methodology for computation of lump sum license fees for other 7 plots</p>	<p>The Board clarifies that it was felt by the Corporation that acceptance of license fee in lump-sum from the Licensees for the residue period on one hand would enhance revenue resources of the Corporation by way of interest accrued and on the other hand would relieve Corporation to keep watch on recovery of monthly leave and license fees as well as reduce the chances of litigation in case of defaulters. Hence, the Licensees are allowed to use such plots on Leave &amp; License basis after collecting lump-sum license fees, so that interest accrued thereon is an income towards license fee for SRC. The lump-sum license fees collected will not be refunded to the Licensees which is in the best interest and beneficial to the SRC. The SRC has calculated interest @ 7% p.a. and normal contractual rate of interest is 6% as per CPC 1908.</p>
6.	<p>VI. The company has allotted four plots against Non virgin shares.</p>	<p>SRC Response: The Board clarifies that appropriate Action is being taken by the Corporation to issue shares and regularize the allotment of plot as per the Policy decision.</p>
7.	<p>VII. The company has allotted 268 Plots/House for which sub lease deed has not been executed between SRC and allottees.</p>	<p>The Board clarifies that appropriate decision has been taken by the Board for execution of Sub-Lease Deed which are not yet executed.</p>





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8.	VIII. There are non compliance of various provisions of Companies Act, 2013 including non maintains of statutory registers.	The Board clarifies that the compliances of various Provisions of the Companies Act, 2013 are being strictly adhered to. The Company has maintained all the Statutory Registers as per the Provisions of the Companies Act, 2013 except register showing details of full particulars, including quantitative details and the situation of property and equipment, as mandated under sub - rule 3(i)(a) of the Companies (Auditor's Report) order, 2020. Further, the matter is being reviewed in consultation with our Company Secretary as required under the Act.																																																																																								
9.	IX. Non declaration of interest in MBP-1 about transaction with M/s. Trust core, a partnership firm in which relative of Shri Naresh Bulchandani (one of the director), relative of director is one of the Partner which is stipulated under Companies Act, 2013	The Corporation has got legally confirmed that the engagement of Trust Core Financial Services for investment Advisory Services related to the Companies Debt Fund Investments does not attract the Section 188 of the Companies Act, 2013 as it is a transaction done at an Arm's Length and in ordinary course of business, and thus the requirements for prior approval and disclosure under Section 188 do not apply to this transaction.																																																																																								
10.	<p>Delayed Collection of Overdue Receivables: The amount receivable towards lease rent is gradually increasing in comparison to lease rent income during last three years as under:</p> <table border="1"> <thead> <tr> <th>Sr. no.</th> <th>Particulars</th> <th>F.Y. 2022-23</th> <th>F.Y. 2023-24</th> </tr> </thead> <tbody> <tr> <td>1.</td> <td>Lease income</td> <td>2,50,94,262</td> <td>2,45,93,403</td> </tr> <tr> <td></td> <td>2,53,88,998</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Increase in lease rent as compared to previous year</td> <td>-10,81,349 (-4.13%)</td> <td>-5,00,859 (-2.00%)</td> </tr> <tr> <td></td> <td>7,95,595 (3.24%)</td> <td></td> <td></td> </tr> <tr> <td>2.</td> <td>Debtors:</td> <td></td> <td></td> </tr> <tr> <td>2.1</td> <td>Debtors (without litigation)</td> <td>63,90,142</td> <td>71,14,482</td> </tr> <tr> <td></td> <td>80,93,320</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Increase in Debtors ( without litigation) as compared to previous year</td> <td>-17,49,812 (-19.74%)</td> <td>17,03,178 (26.65%)</td> </tr> <tr> <td></td> <td>-7,24,340 (-10.18%)</td> <td></td> <td></td> </tr> <tr> <td>2.2</td> <td>Debtors ( with litigation)</td> <td>4,87,07,657</td> <td></td> </tr> <tr> <td></td> <td>5,23,01,435</td> <td></td> <td>5,53,45,758</td> </tr> <tr> <td></td> <td>Increase in Debtors (with litigation) as compared to previous year</td> <td>53,35,784 (12.30%)</td> <td></td> </tr> <tr> <td></td> <td>35,93,778 (7.38%)</td> <td></td> <td>30,44,323 (5.82%)</td> </tr> <tr> <td>2 (2.1+2.2)</td> <td>Total debtors</td> <td>5,58,22,139</td> <td></td> </tr> <tr> <td></td> <td>5,86,91,577</td> <td></td> <td>6,34,39,078</td> </tr> <tr> <td></td> <td>Increase in total debtors as compared to previous year</td> <td>35,85,972 (6.86%)</td> <td>47,47,501 (8.09%)</td> </tr> <tr> <td></td> <td>28,69,438 (5.14%)</td> <td></td> <td></td> </tr> <tr> <td>3.</td> <td>Provision for Doubtful debt</td> <td>1,70,34,890</td> <td>1,52,64,261</td> </tr> <tr> <td></td> <td>2,76,72,879</td> <td></td> <td></td> </tr> <tr> <td></td> <td>Increase in Provision for Doubtful debt as compared to previous year</td> <td>15,89,358 (11.62%)</td> <td></td> </tr> <tr> <td></td> <td>17,70,629 (11.60%)</td> <td></td> <td>1,06,37,989 (62.45%)</td> </tr> </tbody> </table>	Sr. no.	Particulars	F.Y. 2022-23	F.Y. 2023-24	1.	Lease income	2,50,94,262	2,45,93,403		2,53,88,998				Increase in lease rent as compared to previous year	-10,81,349 (-4.13%)	-5,00,859 (-2.00%)		7,95,595 (3.24%)			2.	Debtors:			2.1	Debtors (without litigation)	63,90,142	71,14,482		80,93,320				Increase in Debtors ( without litigation) as compared to previous year	-17,49,812 (-19.74%)	17,03,178 (26.65%)		-7,24,340 (-10.18%)			2.2	Debtors ( with litigation)	4,87,07,657			5,23,01,435		5,53,45,758		Increase in Debtors (with litigation) as compared to previous year	53,35,784 (12.30%)			35,93,778 (7.38%)		30,44,323 (5.82%)	2 (2.1+2.2)	Total debtors	5,58,22,139			5,86,91,577		6,34,39,078		Increase in total debtors as compared to previous year	35,85,972 (6.86%)	47,47,501 (8.09%)		28,69,438 (5.14%)			3.	Provision for Doubtful debt	1,70,34,890	1,52,64,261		2,76,72,879				Increase in Provision for Doubtful debt as compared to previous year	15,89,358 (11.62%)			17,70,629 (11.60%)		1,06,37,989 (62.45%)	The Board clarifies that as the Civil Suits/Arbitration proceedings are pending against the Licensees for recovery of outstanding dues, the said outstanding dues receivable has been shown as "Trade Receivables" in the books of Accounts. Recently there have been four instances where the possession of premises has been successfully reclaimed from the Licensee after the receipt of Court Orders. Even if there are disputes or pending legal proceedings, we believe that the Corporation will recover the outstanding dues as well as peaceful and vacant possession from the defaulters. Further, we are in the process of hiring the services of a professional for giving his learned opinion on the above mentioned subject keeping in mind Legal Aspects, Accounting Standards, Income Tax Act, GST Act and any other prevailing Act.
Sr. no.	Particulars	F.Y. 2022-23	F.Y. 2023-24																																																																																							
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	<p>Considering the above fact, it is noticed that The Company has failed to recover a sum of Rs. 6.34 crores and filed court cases for recovery of outstanding dues for a sum of Rs.5.53 crores as well as recovery of possession from allottees. Moreover, Interest due on the said outstanding amount for a sum of Rs. 3.55 crores (including suit filed cases for Rs.3.45 crores) is also recoverable which has not been considered in books of accounts "as income". It is conveyed that the said interest will be considered as income when it will be received. It clearly indicates that there is lack of efforts in collection, reconciliation, taking effective actions and follow-up of recovery of the dues from Allottees of the respective plots.</p>															
11.	<p>XI. Moreover, the company has failed to recover amount towards development charges from the allottees of the plots along with interest due thereon which is due since long as under:</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>Debtors (DC A/c)- Housing</td> <td>5,517</td> </tr> <tr> <td>Debtors (House Sale) - Commercial</td> <td>3,12,771</td> </tr> <tr> <td>Debtors (House Sale) - Housing</td> <td>4,61,272</td> </tr> <tr> <td>Plot Allottees A/c (DC)(UNS) - Land</td> <td>16,34,272</td> </tr> <tr> <td>Plot Allottees (Interest Accrued) (UNS) - Land</td> <td>3,07,799</td> </tr> <tr> <td><b>Total</b></td> <td><b>27,21,631</b></td> </tr> </tbody> </table>	Particulars	Amount	Debtors (DC A/c)- Housing	5,517	Debtors (House Sale) - Commercial	3,12,771	Debtors (House Sale) - Housing	4,61,272	Plot Allottees A/c (DC)(UNS) - Land	16,34,272	Plot Allottees (Interest Accrued) (UNS) - Land	3,07,799	<b>Total</b>	<b>27,21,631</b>	<p>The Board clarifies that as per the terms of allotment, the allottees of plots are required to make the payment of development charges in lump-sum or in four equated instalments with 15% built-in interest thereon. In case of failure to make the timely payment, the allottee is liable to make the payment with penal interest @ 15% p.a. The Sub-lease deed are being executed only after full and final payment of the development charges alongwith interest on account of delayed period received from the concerned allottee.</p>
Particulars	Amount															
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12.	<p>XII. Moreover, there is no procedure/system to verify/review credit worthiness, paying capacity of lease rent and verification of credentials before allotment of plots on leave and license basis.</p>	<p>The Board of Directors assures the Member that the corrective and preventive measures will be initiated to address the issue highlighted by the Auditor.</p>														
13.	<p>XIII. The cost of the houses for a sum of Rs. 15,16,203 has wrongly been considered into "Opening Stock" in books of account of the company which shall be considered into "Fixed Asset". Moreover, compliance with AS 10 with regards to depreciation has not been ensured resulting into under booking of depreciation of Rs. 14,40,392/-.</p>	<p>The Board of Directors assures the Member that the corrective and preventive measures will be initiated to address the issue highlighted by the Auditor.</p>														
14.	<p>XIV. Government of India has granted lease of 2600 Acres of land by executing Head lease deed on 28th Nov, 1955. However, the value of such land parcel is not included in lease hold land of the company. Further it is noted that a sum of Rs. 4,95,326/- has been considered as "Lease hold Land" in fixed asset for which no documentary evidence is available nor management is able to identify the amount belongs to which lease hold property.</p>	<p>The Board of Directors have noted the observation raised by the Auditors and efforts are being made to identify the nature of capital expenditure incurred linked to this amount.</p>														
15.	<p>XV. The company has incurred expenditure for a sum of Rs.7,48,504/- for development of project(s) like architectural services, structural design, approval fees paid to GDA, Labor Cess and related permission for three plots Bering Com. Building 218, 218-A, comm. Building Plot 11/6 (Comm) and Old Court Building long back. The</p>	<p>The matter is under consideration of the Board of Directors and appropriate action as suggested by Auditors will be taken.</p>														





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	said amount is currently reflected in Capital work in progress which should have been ideally written off in profit and loss account because the project is declared as cancelled/will not be executed.									
16.	<p>XVI. Following amounts have been shown as payable which is carried forward since long and it is conveyed that it will not be payable in future:</p> <table border="1"><thead><tr><th>Particulars</th><th>Amount</th></tr></thead><tbody><tr><td>Deposit (Guest house) Central</td><td>38,900/-</td></tr><tr><td>Security deposit refundable</td><td>10,02,165/-</td></tr><tr><td>Total</td><td>Rs. 10,41,065/-</td></tr></tbody></table>	Particulars	Amount	Deposit (Guest house) Central	38,900/-	Security deposit refundable	10,02,165/-	Total	Rs. 10,41,065/-	The matter is under consideration of the Board of Directors and appropriate action as suggested by Auditors will be taken.
Particulars	Amount									
Deposit (Guest house) Central	38,900/-									
Security deposit refundable	10,02,165/-									
Total	Rs. 10,41,065/-									
17.	The company has transferred Rs. 3,32,580/- in unclaimed dividend account for the FY. 2016-17 to Investor Education and Protection Fund on 09.06.2025 which is due to be paid in FY. 2024-25. However, respective shares have not been transferred to Investor Education and Protection Fund.	The Board has noted the observation of the Audit and further clarifies that the Corporation has initiated the process of transferring the shares to the Investor Education and Protection Fund (IEPF) pursuant to the resolution passed at the Meeting of the Board of Directors held on 10.03.2025. The process is presently underway, as the data compilation is extensive and time-consuming.								
18.	<p>The Company has recognized revenue amounting to ₹ 25.79 Lacs excluding GST from lease rent from customers during the year ended March 31, 2025. The corresponding amount is outstanding and has been included in Trade Receivables. Based on our audit evidence, there exists significant uncertainty regarding the ultimate collection of this receivable due to the customers severe financial difficulties / lack of intention to pay.</p> <p>This accounting treatment does not comply with Accounting Standard (AS) 9 which in para 10 provides as under: "Revenue from sales or service transactions should be recognized when the requirements as to performance set out in paragraphs 11 and 12 are satisfied, provided that at the time of performance it is not unreasonable to expect ultimate collection. If at the time of raising of any claim it is unreasonable to expect ultimate collection, revenue recognition should be postponed."</p> <p>Furthermore, Paragraph 11 of AS 9 clarifies that In a transaction involving the sale of goods, performance should be regarded as being achieved when the following conditions have been fulfilled: (ii) no significant uncertainty exists regarding the amount of the consideration that will be derived from the sale of the goods.</p> <p>Given the lack of reasonable certainty of collection, the recognition of revenue from this transaction should have been postponed. By recognizing the revenue, the Company has not complied with AS 9. Consequently,</p>	The Board clarifies that the Corporation is reviewing its policies to ensure proper disclosure and in the process of hiring the services of a professional for giving his learned opinion on the above mentioned subject keeping in mind Legal Aspects, Accounting Standards, Income Tax Act, GST Act and any other prevailing Act.								





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	<p>below effects are arose in Books of account for the year ended March 31, 2025:</p> <ul style="list-style-type: none"><li>• Revenue from Operations, Profit Before Tax, and Trade Receivables are overstated by ₹25.79 Lacs, ₹10.57 lacs and ₹15.22 lacs respectively.</li><li>• The tax expense is overstated by ₹ 2.66 lacs, and Profit after tax for the year is overstated by ₹10.57 Lacs.</li></ul> <p>This also results in an overstatement of Retained Earnings as at March 31, 2025.</p>	
19.	<p>We have been informed that there is an ongoing dispute among the partners of "Spark Hospitality &amp; Events". There is an overdue amount on account of force majeure claimed by the "Spark Hospitality &amp; Events" with respect to breakdown of Covid-19 and also due to the said dispute. The management of the company has already obtained legal advice for the same from Sr. Advocate, High Court, Ahmedabad and the matter is under arbitration proceedings as per the terms of the agreement.</p> <p>Under these circumstances, nothing can be commented till the final outcome. Also, the company has received Rs.30,00,000/- on 06.04.2022 in connection with the said matter which has been classified under the head "Other Current Liability" in the financial statements of the company.</p>	<p>The management of the company has already obtained legal advice for the same from Sr. Advocate - High Court, Ahmedabad and the matter is under Arbitration Proceedings as per the terms of the Agreement. Under these circumstances nothing can be commented till the final outcome.</p>
20.	<p>Amount of Rs. 11,90,263/- pertains to unpaid PF Dues of Gandhidham Service trust, recovered/debited from SBI Account of SRC Ltd on order of PF Trust to SBI.</p> <p>Whereas office letter GJ/26213/ENF-V/1203 dated 12.12.1996 while providing separate PF Code GJ26213 to Gandhidham service Trust, it was clearly stated by PF department that both units are not separate and independent units. SRC has filed case against Regional PF commissioner- II in Hon'ble High court against the order passed by PF department and the said matter is sub-judice with Hon'ble Gujarat High court.</p>	<p>The Board clarifies that the observation of the Auditor has been noted and legal opinion is being obtained from the Sr. Advocate of Gujarat High Court.</p>
21.	<p>XXI. The company has transferred Rs. 3,32,580/- in unclaimed dividend account for the F.Y. 2016-17 to Investor Education and Protection Fund on 09.06.2025 which is due to be paid in F.Y. 2024-25. However, respective shares have not been transferred to Investor Education and Protection Fund.</p>	<p>The Board has noted the observation of the Audit and further clarifies that the Corporation has initiated the process of transferring the shares to the Investor Education and Protection Fund (IEPF) pursuant to the resolution passed at the Meeting of the Board of Directors held on 10.03.2025. The process is presently underway, as the data compilation is extensive and time-consuming.</p>
22.	<p>XXII. The company has charged Rs. 100 towards issue of each Duplicate share certificate. As per rule 6(2)(a) read with section 46 of the Companies act, 2013 company cannot charge more than Rs. 50 for issuing each Duplicate share certificate. Hence, the company has over charged Rs.1700 from share holders.</p>	<p>The Board of Directors assures the Member that the corrective and preventive measures will be initiated to address the issue highlighted by the Auditor.</p>
23.	<p>XXIII. Based on our examination which included test checks, the company has used an accounting software ("Tally Prime Edit Log") for maintaining its books of</p>	<p>The Board clarifies that the observation of the Auditor is noted and appropriate action has been</p>





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<p>account which has a feature of recording audit trail (edit log) facility and the said facility was active only from 14-02-2025. Further it is noted that no audit trail is enabled at database level, hence any changes made directly to the data base cannot be tracked. The company is having 4 different users to record tally transactions however there is no maker checker control enabled, hence a single person can modify entire leg of transaction and can go unnoticed.</p> <p>As the audit trail was enabled only from 14-02-2025, it can be ascertained that the feature was not operated effectively throughout the year. Further due to lack of database logs, we are unable to comment if the edit logs have been tampered with or not.</p> <p>Based on information provided to us, the company has retained its edit log since inception i.e., from 14-02-2025</p>	<p>initiated as suggested and in accordance with the mandatory requirements.</p>
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For Sindhu Resettlement Corporation Limited.,

*S. Lakhwani*  
23/12/2025  
Shewak N. Lakhwani  
Director  
(DIN: 06393857)





# THE SINDHU RESETTLEMENT CORPORATION LTD.

Regd. Office: ADIPUR (KUTCH) GUJARAT.  
CIN # U45300GJ1948PLC001115

Phone: (02836) 260403 ~ Email: src@sindhu-src.org Web Site: www.sindhu-src.org

Date: 24<sup>th</sup> December, 2025

To,  
The Registrar of Companies,  
Ahmedabad, Gujarat.

## Subject: Details of Director as on 31.03.2025

Respected Sir,

With reference to above mentioned subject. This is to bring to your kind notice that following are the directors of the company as on 31.03.2025.

Sr.No	Name of Director	Address	Designation
1.	Naresh Hansraj Bulchandani	Plot No.7/8, S.D.B Adipur – 370205	Director
2.	Harish perunmal Kalyani	Plot No. 376, Ward -2/B, Adipur 370205	Director
3.	Prem Sobhrajmal Lalwani	Plot No.254, Ward -2/B, Near Santoshi Maa Mandir, Adipur -370205	Director
4.	Nilesh M. Pandya	SDB149/150, Adipur, Kac- hchh, Gandhidham,370205 ,Gujarat,India	Director
5.	Shewak N. Lakhwani	A-2-202, Bageshree Appartment, Opp. Gulmahor Park Mall, Satellite, Ahmedabad City, Ahmedabad, Gujarat – 380015.	Director
6.	Dy Chairman Kandla Port Trust – Velkuru Raveendra Reddy	C- 71, K.P.T Colony, Gopalpuri, Gandhidham, Kutch, Gujarat -370240.	Nominee Director
7.	Under Secretary Ministry of Shipping.	New Delhi	Nominee Director
8.	Dy Secretary Revenue Department	Govt. of Gujarat, Sachivalaya, Gandhinagar	Nominee Director

The Signatory details of the Company on the MCA Portal contains the details of only Six Director as on 31.03.2025, whereas the directors associated with the Company as on 31.03.2025 are Eight as mentioned above. The detail of Dy. Secretary Revenue Department, Government of Gujarat, Gandhinagar and Under Secretary Ministry of Shipping is unavailable as the post is reserved by Designation and no Director has been nominated on the post. So, in the Form MGT - 7 we have filed details of only 6 directors to match the details with data of signatory details on MCA portal as on 31.03.2025.

Further we would like to clarify that in E-form MGT -7, Point VII wherein particulars regarding total number of promoters are required to be filled and we have considered nominee directors as non-promoter and hence total number of promoters are mentioned as 26 (excluding nominee Director).

Further we would like to clarify that the company has three category of Equity shares, and the during the year the equity share of the company have been converted from physical to dematerialized form in two categories. Whereas the details for ISIN in point IV(i)(d) of E-form MGT-7 only single ISIN of the equity shares of the company is allowed. Thus, to clarify the details the ISIN of the company have been mentioned here.

1. INEOBPB01014
2. INEOBPB01022
3. INEOBPB01030

All the stakeholders are requested to take note of the same.

Certified Copy,

For Sindhu Resettlement Corporation Limited,

Shewak N. Lakhwani  
Director  
(DIN: 06393857)





**THE INSTITUTE OF  
Company Secretaries of India**  
**भारतीय कम्पनी सचिव संस्थान**  
**IN PURSUIT OF PROFESSIONAL EXCELLENCE**  
Statutory body under an Act of Parliament  
(Under the jurisdiction of Ministry of Corporate Affairs)

For Any Query : [UDIN@icsi.edu](mailto:UDIN@icsi.edu)

To change / update the email and mobile number, please [Click Here](#)

### Document details

UDIN Created Date:	24-12-2025
Unique Document Identification Number(UDIN):	F007147G002752824
Members Details:	DIPAK RENUKUMARF7147
Name of the Company:	SINDHU RESETTLEMENT CORPN LIMITED
Type of Certificate/Report:	Certificate
Document Type:	Certification of Annual Return in Form MGT-7 under Section 92(1) of Companies Act, 2013
Date of signing / Effective date	24-12-2025
Document Description:	Certification of Annual Return in Form MGT-7 under Section 92(1) of Companies Act, 2013
Status:	Active



Latitude: 23.074226  
Longitude: 70.096034  
Elevation: 35.02±1.08 m  
Accuracy: 3.79 m  
Time: 12-23-2025 12:59  
Note: src

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Latitude: 23.074236  
Longitude: 70.096031  
Elevation: 35.22±1.1 m  
Accuracy: 21.91 m  
Time: 12-23-2025 12:59  
Note: src

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