FORM NO. MGT-7

[Pursuant to sub-Section(1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11of the Companies (Management and Administration) Rules, 2014]

सत्यमेव जयते

Annual Return

(other than OPCs and Small Companies)

Form language (●) English ( ) Hindi

Refer the instruction kit for filing the form.

I. REGISTRATION AND OTHER DETAILS

(i) * Corporate Identification Number (CIN) of the company: L17100DL1985PLC303047 [Pre-fill]

Global Location Number (GLN) of the company:

* Permanent Account Number (PAN) of the company: AAACH4692J

(ii) (a) Name of the company: SRM ENERGY LIMITED

(b) Registered office address

Room No. 2, Ground Floor, 1A Mall Road Shanti Kunj, Vasant K
unj New Delhi
New Delhi
New Delhi
Delhi
110070

(c) *e-mail ID of the company: CS********GY.IN

(d) *Telephone number with STD code: 01*******83

(e) Website: www.srmenergy.in

(iii) Date of Incorporation: 03/09/1985

(iv)

Type of the Company	Category of the Company	Sub-category of the Company
Public Company	Company limited by shares	Indian Non-Government company

(v) Whether company is having share capital (●) Yes ( ) No

(vi) *Whether shares listed on recognized Stock Exchange(s) (●) Yes ( ) No

(a) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	BOMBAY	1

(b) CIN of the Registrar and Transfer Agent U67120WB2011PLC165872 Pre-fill

Name of the Registrar and Transfer Agent

MCS SHARE TRANSFER AGENT LIMITED

Registered office address of the Registrar and Transfer Agents

383 LAKE GARDENS
1ST FLOOR

(vii) *Financial year From date 01/04/2023 (DD/MM/YYYY) To date 31/03/2024 (DD/MM/YYYY)

(viii) *Whether Annual general meeting (AGM) held ◉ Yes ○ No

(a) If yes, date of AGM 26/09/2024

(b) Due date of AGM 30/09/2024

(c) Whether any extension for AGM granted ○ Yes ◉ No

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

*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	D	Electricity, gas, steam and air condition supply	D1	Electric power generation, transmission and distribution	0

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

*No. of Companies for which information is to be given 2 Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	SRM ENERGY TAMILNADU PRIV	U40105DL2008PTC280425	Subsidiary	100
2	SPICE ENERGY PRIVATE LIMITE	U70200DL2007PTC168066	Holding	71.19

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	11,300,000	9,060,000	9,060,000	9,060,000
Total amount of equity shares (in Rupees)	113,000,000	90,600,000	90,600,000	90,600,000

Number of classes: 1

Class of Shares Equity Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of equity shares	11,300,000	9,060,000	9,060,000	9,060,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	113,000,000	90,600,000	90,600,000	90,600,000

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	0	0	0	0
Total amount of preference shares (in rupees)	0	0	0	0

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

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
Equity shares	Physical	DEMAT	Total			

At the beginning of the year	1,016,350	8,043,650	9060000	90,600,000	90,600,000	
Increase during the year	0	10,100	10100	0	0	0
i. Pubic Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0
iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0
viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify Share Dematerialized		10,100	10100			
Decrease during the year	10,100	0	10100	0	0	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify Share Dematerialised	10,100		10100			
At the end of the year	1,006,250	8,053,750	9060000	90,600,000	90,600,000	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify						
Decrease during the year	0	0	0	0	0	0

i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify						
At the end of the year	0	0	0	0	0	

ISIN of the equity shares of the company: INE173J01018

(ii) Details of stock split/consolidation during the year (for each class of shares): 0

Class of shares		(i)	(ii)	(iii)
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

[Details being provided in a CD/Digital Media] ○ Yes ◉ No ○ Not Applicable

Separate sheet attached for details of transfers ◉ Yes ○ No

Note: In case list of transfer exceeds 10, option for submission as a separate sheet attachment or submission in a CD/Digital Media may be shown.

Date of the previous annual general meeting	28/09/2023
Date of registration of transfer (Date Month Year)	

Type of transfer		1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock

Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
Ledger Folio of Transferor			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			
Transferee's Name			
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)		
Type of transfer		1 - Equity, 2- Preference Shares,3 - Debentures, 4 - Stock

Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)	
Ledger Folio of Transferor			
Transferor's Name			
	Surname	middle name	first name
Ledger Folio of Transferee			
Transferee's Name			
	Surname	middle name	first name

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

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	0	0	0

Particulars	Number of units	Nominal value per unit	Total value
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Total			0

Details of debentures

Class of 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
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

(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 0

(ii) Net worth of the Company -37,199,319

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	0	0	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	

	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	
6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	6,450,000	71.19	0	
10.	Others	0	0	0	
	Total	6,450,000	71.19	0	0

Total number of shareholders (promoters) 1

(b) *SHARE HOLDING PATTERN - Public/Other than promoters

S. No.	Category	Equity		Preference	
		Number of shares	**Percentage**	**Number of shares**	**Percentage**
1.	Individual/Hindu Undivided Family				
	(i) Indian	2,094,261	23.12	0	
	(ii) Non-resident Indian (NRI)	23,045	0.25	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	305,495	3.37	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	186,605	2.06	0	
10.	Others Clearing Members	594	0.01	0	
	Total	2,610,000	28.81	0	0

Total number of shareholders (other than promoters) 7,012

Total number of shareholders (Promoters+Public/ Other than promoters) 7,013

VII. *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS
(Details, Promoters, Members (other than promoters), Debenture holders)

Details	At the beginning of the year	At the end of the year
Promoters	1	1
Members (other than promoters)	5,837	7,012
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. **Promoter**	0	0	0	0	0	0
B. Non-Promoter	1	3	1	3	0	0
(i) Non-Independent	1	1	1	1	0	0
(ii) Independent	0	2	0	2	0	0
C. Nominee Directors representing	0	0	0	0	0	0
(i) Banks & 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	1	3	1	3	0	0

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 share(s) held	Date of cessation (after closure of financial year : If any)
Sharad Rastogi	09828931	Whole-time directo	0	
Vijay Kumar Sharma	03272034	Director	0	
Tanu Agarwal	07134266	Additional director	0	
PARSHANT CHOHAN	09577754	Director	0	
RAMAN KUMAR MALL	ARPPM1214Q	CFO	7	
PANKAJ GUPTA	BXXPG6069A	Company Secretar	0	

(ii) Particulars of change in director(s) and Key managerial personnel during the year 2

Name	DIN/PAN	Designation at the beginning / during the financial year	Date of appointment/ change in designation/ cessation	Nature of change (Appointment/ Change in designation/ Cessation)
Tanu Agarwal	07134266	Director	28/02/2024	Cessation
Tanu Agarwal	07134266	Additional director	28/03/2024	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	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	28/09/2023	5,848	36	71.23

B. BOARD MEETINGS

*Number of meetings held 8

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	23/05/2023	4	4	100
2	13/06/2023	4	4	100
3	27/06/2023	4	4	100
4	14/08/2023	4	4	100
5	28/09/2023	4	3	75
6	07/11/2023	4	3	75
7	06/02/2024	4	3	75
8	28/03/2024	4	2	50

C. COMMITTEE MEETINGS

Number of meetings held 10

S. No.	Type of meeting	Date of meeting	Total Number of Members as on the date of the meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committ	23/05/2023	3	3	100
2	Audit Committ	13/06/2023	3	2	66.67
3	Audit Committ	27/06/2023	3	2	66.67
4	Audit Committ	14/08/2023	3	3	100
5	Audit Committ	07/11/2023	3	2	66.67
6	Audit Committ	06/02/2023	3	2	66.67
7	NRC	23/05/2023	3	3	100
8	NRC	14/08/2023	3	3	100
9	NRC	07/11/2023	3	2	66.67
10	SRC	23/05/2023	3	3	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	26/09/2024 (Y/N/NA)
1	Sharad Rasto(	8	8	100	1	1	100	Yes
2	Vijay Kumar S	8	6	75	10	5	50	Yes
3	Tanu Agarwal	8	6	75	9	9	100	Yes
4	PARSHANT C	8	7	87.5	10	10	100	No

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered: 0

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

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	Pankaj Gupta	Company Secre	474,000	0	0	0	474,000
2	Raman Kumar Malli	Chief Financial (	1,812,000	0	0	0	1,812,000
	Total		2,286,000	0	0	0	2,286,000

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

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

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	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	Name of the Act and section under which offence committed	Particulars of offence	Amount of compounding (in Rupees)

XIII. Whether complete list of shareholders, debenture holders has been enclosed as an attachment

○ Yes ◉ No

(In case of 'No', submit the details separately through the method specified in instruction kit)

XIV. 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.

Name: SATISH KUMAR NIRANKAR

Whether associate or fellow: ○ Associate ◉ Fellow

Certificate of practice number: 19993

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 all the provisions of the Act during the financial year.

Declaration

I am Authorised by the Board of Directors of the company vide resolution no. .. 32 dated 13/08/2024 (DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been compiled 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.

Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.

To be digitally signed by

Director

SHARAD RASTOGI Digitally signed by SHARAD RASTOGI Date: 2024.11.21 16:22:18 +05'30'

DIN of the director 0*8*8*3*

To be digitally signed by

PANKAJ GUPTA Digitally signed by PANKAJ GUPTA Date: 2024.11.21 16:22:44 +05'30'

- (●) Company Secretary
- ( ) Company secretary in practice

Membership number 6*0*8

Certificate of practice number

Attachments

1. List of share holders, debenture holders — Attach
2. Approval letter for extension of AGM; — Attach
3. Copy of MGT-8; — Attach
4. Optional Attachement(s), if any — Attach

List of attachments

Clarification on number of Shareholders.pd
MGT_8_SRM.pdf
Share Transfer.pdf
Clarification for Designated Person_SRM E

Remove attachment

Modify | Check Form | Prescrutiny | Submit

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

SRM ENERGY LIMITED

REGD. OFFICE: ROOM NO. 2, GROUND FLOOR, 1A MALL ROAD, SHANTI KUNJ, VASANT KUNJ, NEW DELHI - 110070

CIN L17100DL1985PLC303047 **website: www.srmenergy.in**
TEL. NO. +91-011-4576 8283 email: info@srmenergy.in

The Registrar of Companies, **Date: 21.11.2024**
NCT of Delhi & Haryana
4th Floor, IFCI Tower, 61,
Nehru Place, New Delhi – 110019, India

Sub: Clarification in submission of Form MGT-7 for financial year 2023-24 in light of the amendment made in Rule 9 of the Companies (Management and Administration) Second Amendment Rules, 2023 dated 27.10.2023 ("Rules").

Dear Sir/Madam,

With reference to the subject, we wish to submit the following clarification:

(a) The Ministry of Corporate Affairs ('**MCA**') has amended Rule 9 of the Companies (Management and Administration) Second Amendment Rules, 2023 on 27.10.2023 ("**Rule/s**") wherein sub-rule 4 to 6 have been introduced as part of Rule 9. As per the rules, every company shall designate a person who shall be responsible for furnishing and extending co-operation for providing information to the Registrar or any other authorized officer with respect to beneficial interest in shares of the company and the details of such a designated person shall be mentioned in Annual Return (i.e. Form MGT-7).

Given above, we submit that by virtue of Board resolution dated February 06, 2024 (copy annexed), **Mr. Pankaj Gupta, Company Secretary of the Company (ISCI M. No. A63088),** has been designated by the Board of Directors of the Company as the Designated Person for the purpose aforesaid.

We request you to take the same on record.

Yours faithfully
For SRM Energy Limited
SHARAD RASTOGI
Digitally signed by SHARAD RASTOGI
Date: 2024.11.21 12:49:57 +05'30'

(Sharad Rastogi)
Whole-time Director
DIN: 09828931
Add: B-15/19, DLF Phase-1
Sikanderpur Ghosi (68)
Haryana - 122002

SRM Energy

SRM ENERGY LIMITED

REGD. OFFICE: ROOM NO. 2, GROUND FLOOR, 1A MALL ROAD, SHANTI KUNJ, VASANT KUNJ, NEW DELHI - 110070

CIN L17100DL1985PLC303047 **website:** www.srmenergy.in
TEL. NO. +91-011-4576 8283 email: info@srmenergy.in

CERTIFIED TRUE COPY OF THE RESOLUTION PASSED AT THE (07/2023-24) MEETING OF THE BOARD OF DIRECTORS OF SRM ENERGY LIMITED HELD ON TUESDAY, THE 06TH DAY OF FEBRUARY, 2024 AT 02:00 P.M. THROUGH VIDEO CONFERENCING HOSTED FROM 21, BASANT LOK COMPLEX, VASANT VIHAR, NEW DELHI - 110057.

TO DESIGNATE THE RESPONSIBLE PERSONS FOR FURNISHING INFORMATION ON BENEFICIAL INTEREST IN SHARES TO THE REGISTRAR OF COMPANIES.

"RESOLVED THAT pursuant to Section 89 of the Companies Act, 2013 read with the Companies (Management and Administration) (Second Amendment) Rules, 2023, dated October 27, 2023, 'the Company Secretary' of the Company of the relevant time period, is designated as the responsible person for furnishing, and extending cooperation for providing, information to the Registrar or any other authorized officer with respect to the beneficial interest in shares of the company.

RESOLVED FURTHER THAT the Company Secretary shall undertake the necessary steps to ensure compliance with all the relevant regulations and laws pertaining to the disclosure of beneficial interest in shares.

RESOLVED FURTHER THAT any Director of the Company be and is hereby severally authorized to do all such acts, deeds, and things as may be necessary or expedient to give effect to the above resolution."

Certified True Copy
For **SRM Energy Limited**

SHARAD RASTOGI Digitally signed by SHARAD RASTOGI Date: 2024.11.21 12:50:17 +05'30'

(Sharad Rastogi)
Director
DIN: 09828931
Add: B-15/19, DLF Phase-1
Sikanderpur Ghosi (68)
Haryana - 122002

cs@srmenergy.in

From:	umesh@mcsregistrars.com
Sent:	19 November 2024 11:44
To:	cs@srmenergy.in; narender.negi@mcsregistrars.com
Cc:	ajay@mcsregistrars.com; 'MCSSTA REPORTS'
Subject:	RE: Request for List of Shareholders of the Company as on March 31, 2024 for the purpose of MGT-7 of the Company | SRM Energy Limited

Dear Sir,

With refer to trail mail, Please be inform that the share holding pattern (Regulation 31)provide to you is with PAN clubbed and MGT 7 which provide to you is without PAN Clubbed.

Regards

U K Gupta

MCS Share Transfer Agent Ltd.
CIN No. U67120WB2011PLC165872
F-65, 1st, Floor, Okhla Industrial Area, Phase-I
New Delhi-110 020
Ph: +91 11 41406149 - 52.

From: cs@srmenergy.in [mailto:cs@srmenergy.in]
Sent: Tuesday, November 19, 2024 10:55 AM
To: umesh@mcsregistrars.com; narender.negi@mcsregistrars.com
Cc: ajay@mcsregistrars.com; 'MCSSTA REPORTS'
Subject: RE: Request for List of Shareholders of the Company as on March 31, 2024 for the purpose of MGT-7 of the Company | SRM Energy Limited

Dear Sir,

There is a mismatch in total No. of Shareholders in the List of Shareholders as on March 31, 2024 and in the Shareholding pattern for the Quarter ended March 31, 2024 provided by you earlier.

As per the shareholding pattern provided by you for the purpose of Regulation 31, the total no. of shareholders in the Company as on March 31, 2024 were 7013, however as per the list of shareholders for the purpose of MGT-7 provided by you in the trailing email, total no. of shareholders as on March 31, 2024 were 7060.

Request you to please provide the reason for the same.

Thanks and Regards
SRM Energy Limited

From: umesh@mcsregistrars.com <umesh@mcsregistrars.com>
Sent: 19 November 2024 09:38
To: cs@srmenergy.in; narender.negi@mcsregistrars.com
Cc: ajay@mcsregistrars.com; 'MCSSTA REPORTS' <mcsstareports@gmail.com>
Subject: RE: Request for List of Shareholders of the Company as on March 31, 2024 for the purpose of MGT-7 of the Company | SRM Energy Limited

Dear Sir,

PFA MGT 7 2024 data.

Regards

U K Gupta

MCS Share Transfer Agent Ltd.
CIN No. U67120WB2011PLC165872
F-65, 1st, Floor, Okhla Industrial Area, Phase-I
New Delhi-110 020
Ph: +91 11 41406149 - 52.

From: cs@srmenergy.in [mailto:cs@srmenergy.in]
Sent: Monday, November 18, 2024 6:34 PM
To: umesh@mcsregistrars.com; narender.negi@mcsregistrars.com
Cc: ajay@mcsregistrars.com
Subject: Request for List of Shareholders of the Company as on March 31, 2024 for the purpose of MGT-7 of the Company | SRM Energy Limited

Dear Sir,

You are requested to please provide list of shareholders of the Company as on March 31, 2024 for the purpose of MGT-7 of the Company.

Thanks and Regards
SRM Energy Limited

S K Nirankar & Associates
Company Secretaries
+91 9711151652
+91 120-5178033
satishniranka r@gmail.com
satish@forecoreprofessionals.com

Form No. MGT-8

[Pursuant to Section 92(2) of the Companies Act, 2013 and Rule 11(2) of Companies (Management and Administration) Rules, 2014]

CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

We, S.K. Nirankar & Associates, Company Secretary in Practice, have examined the registers, records and books and papers of **SRM Energy Limited** (CIN - L17100DL1985PLC303047) (**"the Company"**) as required to be maintained under the Companies Act, 2013 (**"the Act"**) and the rules made thereunder for the financial year ended on March 31, 2024 ("**financial year**" or "**review period**"). In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the Company, its officers and agents, 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. The Company has filed the forms and returns as stated in the Annual Return, with the Registrar of Companies, ~~Regional Director, Central Government, the Tribunal, Court~~ or other Authorities, wherever applicable, within the prescribed time;

4. Calling /convening /holding meetings of Board of Directors or its committees and the meetings of the members of the Company on due dates as stated in the annual return in respect of such meetings, proper notices were given and the proceedings including the circular resolutions have been properly recorded in the Minute Book/Registers maintained for the purpose and the same have been signed. Further, the Company is generally regular in complying provisions of the Act and the Secretarial Standards;

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; *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

7. Contracts/arrangements with related parties as specified in Section 188 of the Act *(Not applicable as no such event took place during the financial year ended on March 31, 2024)*;

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; *(Not applicable as no such event took place during the financial year ended on March 31,*

2024).

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; *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

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 remuneration paid to them, wherever applicable;

13. Appointment /re-appointment /filling up casual vacancy of auditors as per the provisions of Section 139 of the Act, *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

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; *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

15. Acceptance /renewal /repayment of deposits; *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

16. Borrowings from ~~its directors, members, public financial institutions, banks and~~ others and creation / modification/ satisfaction of charges in that respect, as applicable;

17. Loans and investments or guarantee given or providing of securities to other bodies corporate or persons falling under the provisions of Section 186 of the Act *(Not applicable as no such event took place during the financial year ended on March 31, 2024)*; and

18. Alteration of the provisions of the Memorandum or Articles of Association of the Company is as per the applicable provisions of the Act and related Rules thereof *(Not applicable as no such event took place during the financial year ended on March 31, 2024).*

S K Nirankar & Associates
Company Secretaries
(FRN: S2018UP570400]

SATISH KUMAR NIRANKAR
Digitally signed by SATISH KUMAR NIRANKAR
Date: 2024.11.21 11:35:29 +05'30'

S.K. Nirankar & Associates
FCS 9605
CP 19993
Noida (U.P.)
Company Secretaries

Satish Kumar Nirankar
Proprietor
Membership No.: F9605
COP No.: 19993
Peer View No.: 2025/2022

+91 9711151652
+91 120-5178033
satishnirankar@gmail.com
satish@forecoreprofessionals.com

UDIN: F009605F002440220

Place: Noida (U.P.)
Date: November 21, 2024

We, S.K. Nirankar & Associates, Company Secretary in Practice, further state that:

It is the responsibility of the management of the Company to maintain registers, device proper systems to ensure compliance with the provisions of all applicable laws and regulations and to ensure that the systems are adequate and operating effectively.

The opinions stated above are based on the information provided for review of records for certification, as required above.

We have not verified the correctness and appropriateness of financial records and books of accounts of the Company.

This certificate is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

S K Nirankar & Associates
Company Secretaries
(FRN: S2018UP570400]

SATISH KUMAR NIRANKAR

Digitally signed by SATISH KUMAR NIRANKAR
Date: 2024.11.21 11:35:43 +05'30'

S.K. Nirankar & Associates
FCS 9605
CP 19993
Noida (U.P.)
Company Secretaries

Satish Kumar Nirankar
Proprietor
Membership No.: F9605
COP No.: 19993
Peer View No.: 2025/2022
UDIN: F009605F002440220

Place: Noida (U.P.)
Date: November 21, 2024

SRM ENERGY LIMITED											
Room No. 2, Ground Floor, 1A Mall Road, Shanti Kunj, Vasant Kunj, New Delhi - 110070											
CIN	L17100DL1985PLC303047		Face Value	10							
Last AGM	28/09/2023		Current AGM	26/09/2024							
Data 01/04/2023 to 31/03/2024											
(iii) Details of shares/Debentures Transfers sinceclosure date of last financial year											
(or in the case of the first return at any time since the incorporation of the company)											
As on date											
						Transferor's Name				Transferee's Name	
Date of Registration of Transfer	Type of Transfer	No of Shares / Debentures / Units Transferred	Amount per Share/Debenture/Unit (in Rs.)	Ledger Folio of Transferor	Surname	Middle Name	First Name	Ledger Folio of Transferee	Surname	Middle Name	First Name