Form No. MGT-7

Annual Return (other than OPCs and Small Companies)
[Pursuant to sub-section (1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11 of the Companies (Management and Administration) Rules, 2014]

सत्यमेव जयते

Form language
(●) English ( ) Hindi

*All fields marked in * are mandatory*

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN): L50102UP1982PLC015532

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	PASUPATI ACRYLON LIMITED	PASUPATI ACRYLON LIMITED
Registered office address	THAKURDWARAKASHIPUR ROAD, DISTT.MORADABAD,NA,UP,Uttar Pradesh,India,244601	THAKURDWARAKASHIPUR ROAD, DISTT.MORADABAD,NA,UP,Uttar Pradesh,India,244601
Latitude details	29.194904	29.194904
Longitude details	78.878532	78.878532

(a) *Photograph of the registered office of the Company showing external building and name prominently visible: Pasupati Office.pdf

(b) *Permanent Account Number (PAN) of the company: AA******8M

(c) *e-mail ID of the company: *****tarial@pasupatiacrylon.com

(d) *Telephone number with STD code: 01*******00

(e) Website | www.pasupatiacrylon.com

iv *Date of Incorporation (DD/MM/YYYY) | 22/10/1982

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

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

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

vi *Whether company is having share capital (as on the financial year end date) ◉ Yes ○ No

vii (a) Whether shares listed on recognized Stock Exchange(s) ◉ Yes ○ No

(b) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code
1	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)
2	National Stock Exchange (NSE)	A1024 - National Stock Exchange (NSE)

viii Number of Registrar and Transfer Agent | 1

CIN of the Registrar and Transfer Agent	Name of the Registrar and Transfer Agent	Registered office address of the Registrar and Transfer Agents	SEBI registration number of Registrar and Transfer Agent
U67120WB2011PLC165872	MCS SHARE TRANSFER AGENT LIMITED	383 LAKE GARDENS 1ST FLOOR, KOLKATA,Kolkata,West Bengal,India,700045	INR000004108

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

(b) If yes, date of AGM (DD/MM/YYYY) | 18/09/2025

(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: 3

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	13	Manufacture of Textiles	86.6
2	C	Manufacturing	19	Manufacture of coke and refined petroleum products	0.42
3	C	Manufacturing	22	Manufacture of rubber and plastics products	12.98

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/Joint 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	100000000.00	89158825.00	89133121.00	89133121.00
Total amount of equity shares (in rupees)	1000000000.00	891588250.00	891331210.00	891331210.00

Number of classes: 1

Class of shares 1	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	100000000	89158825	89133121	89133121
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	1000000000.00	891588250.00	891331210	891331210

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	0.00	0.00	0.00	0.00
Total amount of preference shares (in rupees)	0.00	0.00	0.00	0.00

Number of classes: 0

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of preference shares				
Nominal value per share (in rupees)				

Total amount of preference shares (in rupees)				

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

(d) Break-up of paid-up share capital

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
	Physical	DEMAT	Total			
(i) Equity shares						
At the beginning of the year	6351945	82781176	89133121.00	891331210	891331210	
Increase during the year	0.00	112460.00	112460.00	1124600.00	1124600.00	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 Demat of physical shares	0	112460	112460.00	1124600	1124600	
Decrease during the year	112460.00	0.00	112460.00	1124600.00	1124600.00	0
i Buy-back of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
iv Others, specify Demat of physical shares	112460	0	112460.00	1124600	1124600	
At the end of the year	6239485.00	82893636.00	89133121.00	891331210.00	891331210.00	
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Issues of shares	0	0	0.00	0	0	
ii Re-issue of forfeited shares	0	0	0.00	0	0	
iii Others, specify			0			
Decrease during the year	0.00	0.00	0.00	0.00	0.00	0
i Redemption of shares	0	0	0.00	0	0	
ii Shares forfeited	0	0	0.00	0	0	
iii Reduction of share capital	0	0	0.00	0	0	
iv Others, specify			0			
At the end of the year	0.00	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company: INE818B01023

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: 52

Attachments:

1. Details of shares/Debentures Transfers — P9E_Transfer Details.xlsm_2025.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)**
Total			

Classes of non-convertible debentures	**Outstanding as at the beginning of the year**	**Increase during the year**	**Decrease during the year**	**Outstanding as at the end of the year**
Total				

(b) Partly convertible debentures

*Number of classes: 0

Classes of partly convertible debentures	**Number of units**	**Nominal value per unit**	**Total value (Outstanding at the end of the year)**

Total			

Classes of partly convertible debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Total				

(c) Fully convertible debentures

*Number of classes: 0

Classes of fully convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Total			

Classes of fully convertible debentures	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Total				

(d) Summary of Indebtedness

Particulars	Outstanding as at the beginning of the year	Increase during the year	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0.00	0.00	0.00	0.00
Partly convertible debentures	0.00	0.00	0.00	0.00
Fully convertible debentures	0.00	0.00	0.00	0.00
Total	0.00	0.00	0.00	0.00

v Securities (other than shares and debentures): 0

Type of Securities	Number of Securities	Nominal Value of each Unit	Total Nominal Value	Paid up Value of each Unit	Total Paid up Value
Total					

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

i *Turnover: 6214317933.19

ii * Net worth of the Company: 3641401177.39

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	17454996	19.58	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	4481752	5.03	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)	36778697	41.26	0	0.00
10	Others	0	0.00	0	0.00
	Total	58715445.00	65.87	0.00	0

Total number of shareholders (promoters) 13

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	26439388	29.66	0	0.00
	(ii) Non-resident Indian (NRI)	1049768	1.18	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	4815	0.01	0	0.00

5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	65831	0.07	0	0.00
7	Mutual funds	179505	0.20	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	2038937	2.29	0	0.00
10	Others Other foreign holdin	639432	0.72	0	0.00
	Total	30417676.00	34.13	0.00	0

Total number of shareholders (other than promoters) 67704

Total number of shareholders (Promoters + Public/Other than promoters) 67717.00

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

Sl.No	**Category**	
1	Individual - Female	0
2	Individual - Male	0
3	Individual - Transgender	0
4	Other than individuals	67717
	Total	67717.00

C Details of Foreign institutional investors' (FIIs) holding shares of the company 3

Name of the FII	**Address**	**Date of Incorporation**	**Country of Incorporation**	**Number of shares held**	**% of shares held**
ACADIAN EMERGING MARKETS MICRO-CAP EQUITY MASTER FUND	STANDARD CHARTERED BANK SECURITIES SERVICES, 3RD FLOOR 23 25 MAHATMA GANDHI ROAD FORT, MUMBAI 400001	01/01/2025	Cayman Islands	54164	0.05

BNP PARIBAS FINANCIAL MARKETS - ODI	BNP PARIBAS HOUSE 1 NORTH AVENUE, MAKER MAXITY BANDRA KURLA COMPLEX, BANDRA EAST MUMBAI 400051	01/01/2025	France	3293	0.01
QUADRATURE CAPITAL VECTOR SP LIMITED	JP Morgan Chase Bank N.A, India Sub Custody 9th Floor, Tower A Block 9, NKP, Western Express Highway,Goregaon E. 400063	01/01/2025	Cayman Islands	8374	0.01

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS
[Details of Promoters, Members (other than promoters), Debenture holders]

Details	**At the beginning of the year**	**At the end of the year**
Promoters	13	13
Members (other than promoters)	68082	67704
Debenture holders	0	0

VIII DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A Composition of Board of Directors

Category	**Number of directors at the beginning of the year**		**Number of directors at the end of the year**		**Percentage of shares held by directors as at the end of year**	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A Promoter	1	0	1	0	18.91	0
B Non-Promoter	1	4	1	4	0.00	0.00
i Non-Independent	1	0	1	0	0	0
ii Independent	0	4	0	4	0	0
C Nominee Directors representing	0	0	0	0	0.00	0.00
i. Banks and FIs	0	0	0	0	0	0
ii Investing institutions	0	0	0	0	0	0

iii Government	0	0	0	0	0	0
iv Small share holders	0	0	0	0	0	0
v Others	0	0	0	0	0	0
Total	2	4	2	4	18.91	0.00

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date: 8

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)
VINEET JAIN	00107149	Managing Director	16851654	
SUBHASH CHANDRA MALIK	00107170	Director	0	18/09/2025
DEVESHWER KUMAR KAPILA	00179060	Director	0	18/09/2025
SATYA PRAKASH GUPTA	00509809	Whole-time director	0	
KAMLESH GUPTA .	07243898	Director	0	
RAJ GANESH VISWANATHAN	03558616	Director	0	
SATISH KUMAR BANSAL	AASPB8444M	CFO	0	
BHARAT KAPOOR	AQXPK9114E	Company Secretary	0	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year: 5

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)
SATHYAMOORTHY SRINIVASAN	00459731	Director	26/09/2024	Cessation
RAJ GANESH VISWANATHAN	03558616	Additional Director	23/08/2024	Appointment
RAJ GANESH VISWANATHAN	03558616	Director	28/09/2024	Change in designation
BHARAT KAPOOR	AQXPK9114E	Company Secretary	15/07/2024	Cessation
BHARAT KAPOOR	AQXPK9114E	Company Secretary	09/08/2024	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: 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
Postal Ballot	28/09/2024	70134	209	42.36
Annual General Meeting	21/08/2024	67335	37	60.25

B BOARD MEETINGS

*Number of meetings held: 4

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	17/05/2024	6	6	100
2	09/08/2024	6	6	100
3	06/11/2024	6	6	100
4	12/02/2025	6	6	100

C COMMITTEE MEETINGS

Number of meetings held: 21

S.No	Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members as on the date of meeting	Attendance	
				Number of members attended	% of attendance
1	Audit Committee	17/05/2024	5	5	100

2	Audit Committee	09/08/2024	5	5	100
3	Audit Committee	06/11/2024	5	5	100
4	Audit Committee	12/02/2025	5	5	100
5	Nomination & Remuneration Committee	17/05/2024	3	3	100
6	Nomination & Remuneration Committee	09/08/2024	3	3	100
7	Stakeholders Relationship Committee	12/04/2024	3	3	100
8	Stakeholders Relationship Committee	22/05/2024	3	3	100
9	Stakeholders Relationship Committee	21/06/2024	3	3	100
10	Stakeholders Relationship Committee	01/08/2024	3	3	100
11	Stakeholders Relationship Committee	20/09/2024	3	3	100
12	Stakeholders Relationship Committee	22/10/2024	3	3	100
13	Stakeholders Relationship Committee	14/11/2024	3	3	100
14	Stakeholders Relationship Committee	17/12/2024	3	3	100
15	Stakeholders Relationship Committee	04/02/2025	3	3	100
16	Stakeholders Relationship Committee	07/03/2025	3	3	100
17	Corporate Social Responsibility Committee	17/05/2024	3	3	100
18	Corporate Social Responsibility Committee	06/11/2024	3	3	100
19	Corporate Social Responsibility Committee	28/01/2025	3	3	100
20	Corporate Social Responsibility Committee	12/02/2025	3	3	100
21	Independent Directors' Meeting	06/11/2024	4	4	100

D ATTENDANCE OF DIRECTORS

S. No	Name of the Director	Board Meetings			Committee Meetings			Whether attended AGM held on
		Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	Number of Meetings which director was entitled to attend	Number of Meetings attended	% of attendance	18/09/2025 (Y/N/NA)
1	VINEET JAIN	4	4	100	14	14	100	Yes
2	SUBHASH CHANDRA MALIK	4	4	100	21	21	100	Yes
3	DEVESHWER KUMAR KAPILA	4	4	100	7	7	100	Yes
4	SATYA PRAKASH GUPTA	4	4	100	18	18	100	Yes
5	KAMLESH GUPTA .	4	4	100	5	5	100	Yes
6	RAJ GANESH VISWANATHAN	2	2	100	2	2	100	Yes

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

A *Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered: 2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Vineet Jain	Managing Director	10660977	13000000	0	1425000	25085977.00
2	Satya Prakash Gupta	Whole-time director	3451817	0	0	279840	3731657.00
	Total		14112794.00	13000000.00	0.00	1704840.00	28817634.00

B *Number of CEO, CFO and Company secretary whose remuneration details to be entered: 2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Satish Kumar Bansal	CFO	2340010	0	0	175068	2515078.00
2	Bharat Kapoor	Company Secretary	1035603	0	0	36422	1072025.00

	Total		3375613.00	0.00	0.00	211490.00	3587103.00

C *Number of other directors whose remuneration details to be entered: 5

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	DEVESHWER KUMAR KAPILA	Director	0	0	0	16500	16500.00
2	SUBHASH CHANDRA MALIK	Director	0	0	0	37500	37500.00
3	SATHYAMOORTHY SRINIVASAN	Director	0	0	0	9000	9000.00
4	KAMLESH GUPTA	Director	0	0	0	13500	13500.00
5	Raj Ganesh Viswanathan	Director	0	0	0	6000	6000.00
	Total		0.00	0.00	0.00	82500.00	82500.00

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: 67717

XIV Attachments

(a) List of share holders, debenture holders: P9E_Details_of_Shareholder_or_Debenture_holder_2025.xlsm

(b) Optional Attachment(s), if any: MGT-8_PAL_2024-25_F.pdf
MGT 7 Clarification.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 PASUPATI ACRYLON LIMITED as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we certify that:
A The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
B During the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:

1 its status under the Act;
2 maintenance of registers/records & making entries therein within the time prescribed therefor;
3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal , Court or other authorities within/beyond the prescribed time;
4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
5 closure of Register of Members / Security holders, as the case may be.
6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
7 contracts/arrangements with related parties as specified in section 188 of the Act;
8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act
10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;
12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
15 acceptance/ renewal/ repayment of deposits;
16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;
17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act ;
18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name: Mehak Gupta

Date (DD/MM/YYYY): 10/11/2025

Place: New Delhi

Whether associate or fellow:

○ Associate ◉ Fellow

Certificate of practice number: 1*0*3

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

*(a) DIN/PAN/Membership number of Designated Person	AQXPK9114E
*(b) Name of the Designated Person	BHARAT KAPOOR

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 19 dated* (DD/MM/YYYY) 09/08/2024 to sign this form and declare that all the requirements of Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:
1 Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
2 All the required attachments have been completely and legibly attached to this form.

***To be digitally signed by**	
*Designation *(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))*	Director
*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator	0*1*7*4*
***To be digitally signed by**	

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

*Whether associate or fellow:

(●) Associate (○) Fellow

Membership number	5*2*7
Certificate of practice number	

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

For office use only:

eForm Service request number (SRN)	AB8923137
eForm filing date (DD/MM/YYYY)	11/11/2025

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

Mehak Gupta & Associates
COMPANY SECRETARIES

304, 6A/1, Ganga Chamber, W.E.A
Karol Bagh, New Delhi - 110005
011-25710134, +91-9953488844
mehakgupta.associates@gmail.com
mhkgupta18@gmail.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

I have examined the registers, records, books and papers of Pasupati Acrylon Limited ("**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, 2025 **("Review Period")**. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the Company, its officers and agents, I hereby certify that:

A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.

B. During the review period, the Company has complied with provisions of the Act and Rules made there-under in respect of:

1. Its status under the Act, which is Active;

2. maintenance of registers/records & making entries therein within the time prescribed therefore;

3. filing of forms and returns with the Registrar of Companies, ~~Regional Director,~~ Central Government, ~~the Tribunal, Court~~ or other authorities within the prescribed time;

   During the period under review, no forms and returns were required to be filed with Regional Director, Tribunal, Court or other authorities.

4. calling/ convening/ holding meetings of Board of Directors or its committees, the meetings of the members of the Company ~~and NCLT convened meeting of the shareholders and the creditors~~ on due dates as stated in the Annual Return in respect of which proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot 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, in compliance of section 91 of the Act;

   During the Review Period, the Company has closed its Register of Members from Wednesday, August 14, 2024, to Wednesday, August 21, 2024 (both days inclusive) as per the provisions of Act and Rules.

6. advances/loans or given guarantees and provided securities to its directors and / or persons or firms or companies referred in Section 185 of the Act:

   During the Review Period, the Company has not extended any loans/ advances to persons covered under Section 185 of the Act.

7. contracts/arrangements with related parties as specified in Section 188 of the Act:

   During the Review Period, as per the minutes of the Audit Committee/ Board of Directors, all the related party transactions under the Act were entered on an arm's length basis in the ordinary course of business and were in compliance with the applicable provisions 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:

   Share transfers/transmission/transposition/duplicate of shares were attended and resolved by the Registrar and Share Transfer Agent viz. MCS Share Transfer Agent Limited/ Company in all instances, wherever required. There were no instances of buy-back of securities, redemption of preference shares or debentures, alteration or reduction of share capital, conversion of shares during the review period.

9. keeping in abeyance the right to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act:

   The Company has not declared any dividend or issued bonus shares;

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;

    During the Review Period, the Company has not declared any dividend. There was no unpaid / unclaimed dividend or other amount which was required to be transferred to Investor Education and Protection Fund in accordance with the provisions of 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) and (5) thereof;

12. constitution/ appointment/ re-appointments/ retirements/ ~~filling up casual vacancies~~/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them, as applicable;

    The Board of Directors of the Company is duly constituted. Appointment/Re-appointment of directors, liable to retire by rotation were made in compliance with the provisions of the Act. Necessary disclosures have been furnished by the directors and provisions relating to remuneration paid to the directors and key managerial personnel were duly complied.

13. appointment/ re-appointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;

    There has not been any instance of appointment/reappointment / filling up casual vacancies of the auditor as per the provisions of Section 139 of the Act.

14. approvals required to be taken from Central Government, Tribunal, Regional Director, Court or such other authorities under the various provisions of the Act;

    During the year under review, the Company has not obtained any approval 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;

    During the Review Period, the Company has not accepted/renewed/ repaid any deposits from/ to the public/members under Section 73 to 76 of the Act read with the applicable rules. Further, there were no outstanding and/or overdue deposit as on March 31, 2025.

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

    During the Review Period, the Company has not borrowed from its members and directors. However, the Company has obtained loans and/or working capital facility from the Banks in compliance with the provisions of Section 180(1)(c) of the Act. The Company has complied with the relevant provisions of the Act and Rules regarding creation/modification/satisfaction of necessary charge in this regard.

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;

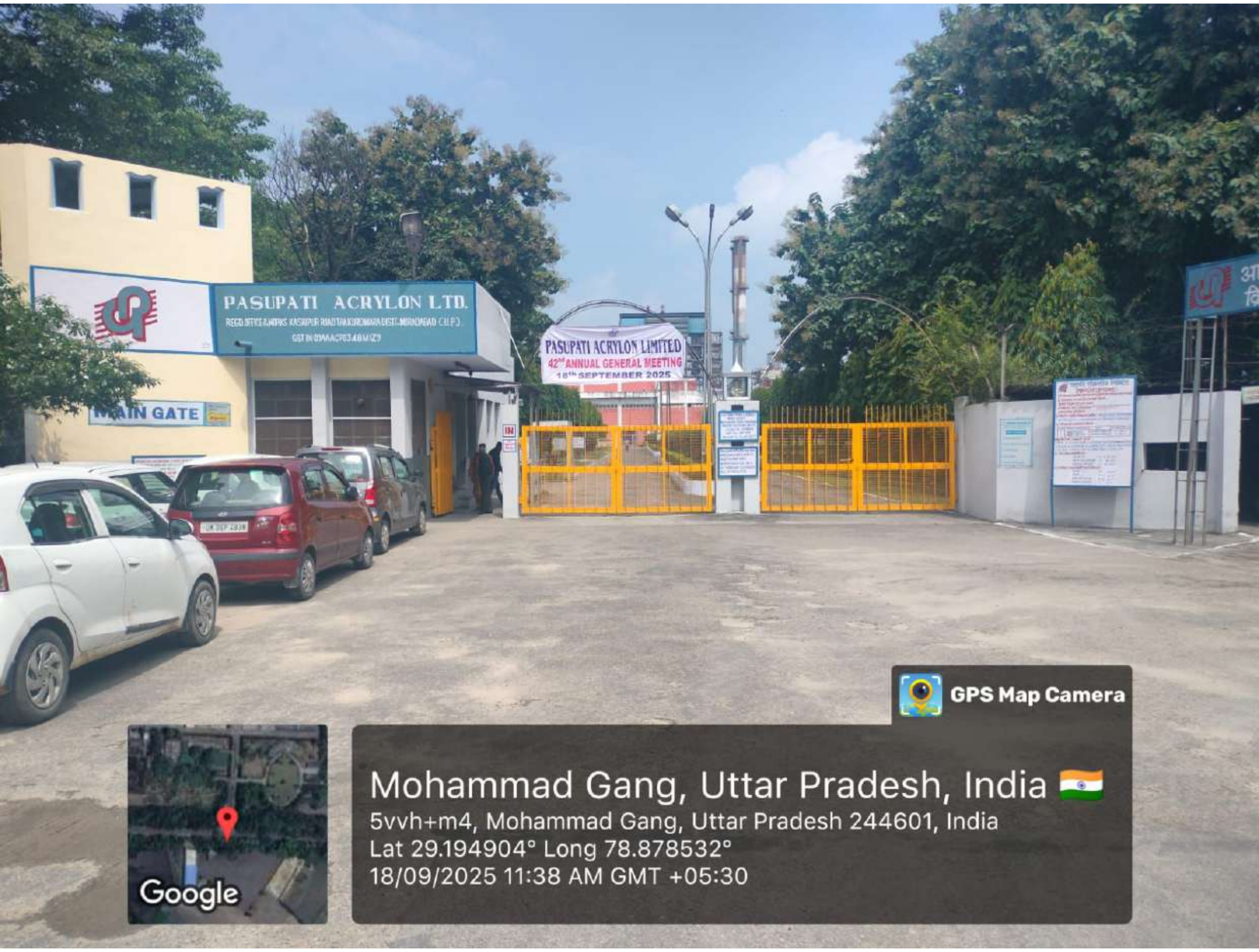
18. Alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

    During the Review Period, the Company has not altered its Memorandum of Association and Articles of Association.

For Mehak Gupta & Associates
Company Secretaries

Mehak Gupta
M. No.: F10703
COP No.: 15013
Peer Review No.: 1643/2022
UDIN: F010703G001830611

Date: November 11, 2025
Place: New Delhi


PASUPATI ACRYLON LTD.
MAIN GATE
PASUPATI ACRYLON LIMITED
42nd ANNUAL GENERAL MEETING
18th SEPTEMBER 2025
IN
GPS Map Camera
Mohammad Gang, Uttar Pradesh, India
5vvh+m4, Mohammad Gang, Uttar Pradesh 244601, India
Lat 29.194904° Long 78.878532°
18/09/2025 11:38 AM GMT +05:30
Google

Pasupati Acrylon Ltd.

Quality Assured Company ISO-9001

11th November, 2025

The Registrar of Companies,
Kanpur, Uttar Pradesh

Dear Sir,

Subject: **Clarification for Annual Return for the financial year 2024-25**

Please note the following clarification in respect of Annual Return for Financial Year 2024-25:

POINT NO. I. REGISTRATION AND OTHER DETAILS

(viii) Number of Registrar and Transfer Agent

The Company's Registrar and Transfer Agent ("RTA") is MCS Share Transfer Agent Limited having address at 179-180, 3rd Floor, DSIDC Shed, Okhla Industrial Area, Phase – I, New Delhi – 110020. However, the registered office of Registrar & Transfer Agent is situated in Kolkata which is pre-filled as per the CIN of RTA.

POINT NO. IV - SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

(i) (d) Break-up of the paid-up Share Capital

During the financial year 2024-25, total of 1,12,460 physical shares were dematerialized. This dematerialization did not result in any change in the total nominal amount or total paid-up capital of the Company.

(iii) Details of share transfers / debenture transfers since closure date of last financial year

The details of transfer of shares in demat mode are not ascertainable and hence the Company is not in a position to report such transfer in demat mode. Therefore, only details of transmission/name change/transposition/deletion of name of physical shares are stated in the enclosed file named 'P9E_Transfer Details_2025'.

POINT NO. VI – SHAREHOLDING PATTERN

A. Promoters

The shareholding pattern of Promoters disclosed in Point Number VI(A) of the Annual Return represents the total shareholding of Promoter as well as Promoter Group of the Company.

B. Public/Other than promoters

Point VI(B)(10) - Due to word limitations in the form, detailed information regarding shareholding classified under "Others" category is provided below for reference and completeness:

Sr. No.	Category	Equity	
		No. of Shares	Percentage
1	Foreign Banks	90	0.00%
2	Foreign Companies	4,16,790	0.47%
3	Clearing Members	2,22,552	0.25%
Total		**6,39,432**	**0.72%**

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

Company's Registrar & Transfer Agent – MCS Share Transfer Agent Limited was unable to provide gender-wise bifurcation of the total number of shareholders. Accordingly, the total number of shareholders has been disclosed under the category "Other than individuals".

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

Date of Incorporation of FIIs are not available as per the data provided by the Company's Registrar & Transfer Agent – MCS Share Transfer Agent Limited. Since the e-form does not accept blank entries for the "Date of Incorporation" field, hence, date of incorporation is entered as 01/01/2025 as a dummy date across all three columns to proceed with the submission.

POINT NO. VII – NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS

The number of members (other than promoters) represents the total number of folios as per the records of the Registrar & Share Transfer Agent. There are cases where a single shareholder is holding multiple folios or securities in multiple demat accounts. However, the Company has not clubbed such cases.

POINT NO. VIII – DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

B (i) Details of directors and Key managerial personnel as on the closure of financial year

Mr. Subhash Chandra Malik (DIN: 00107170) and Mr. Deveshwer Kumar Kapila (DIN: 00179060) ceased to be independent directors of the company on the conclusion of 42nd Annual General Meeting of the Company held on 18th September, 2025 due to completion of their second term as Independent Directors of the Company in terms of the provisions of Section 149(11) of the Companies Act, 2013.

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

Mr. Sathyamoorthy Srinivasan (DIN: 00459731) ceased to be independent director of the Company w.e.f 26th September, 2024 due to completion of his second term as an Independent Directors of the Company in terms of the provisions of Section 149(11) of the Companies Act, 2013.

Mr. Raj Ganesh Viswanathan (DIN ; 03558616) was appointed as an Additional Director under the category of Independent Director w.e.f 23rd August, 2024. Subsequently, Shareholders of the Company, by way of special resolution passed through postal ballot, have approved the appointment of Mr. Raj Ganesh Viswanathan as an Independent Director of the Company on 28th September, 2024.

Mr. Bharat Kapoor had resigned from the position of Company Secretary of the Company w.e.f 15th July, 2024, however, he has rejoined w.e.f 9th August, 2024 as Company Secretary of the Company.

POINT NO. IX - MEETINGS OF MEMBERS / CLASS OF MEMBERS / BOARD / COMMITTEES OF THE BOARD OF DIRECTORS

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

In the case of postal ballot, percentage of total shareholding under Attendance of members is calculated on the basis of total number of votes polled through remote voting. In the case of Annual General Meeting held on 21.08.2024, percentage of total shareholding under Attendance of members is calculated on the basis of number of shares held by the members present in the AGM.

POINT NO. X – REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered; and

B. Number of CEO, CFO and Company Secretary whose remuneration details to be entered:

Amount entered in "Gross Salary" includes Basic Salary, perquisites and allowances. Amount entered in "Other" includes 'retiring benefits such as contribution to provident fund, superannuation, gratuity etc. ' for Wholetime Directors and KMPs.

C. Number of other Directors whose remuneration details to be entered:

Independent Directors do not draw any remuneration/commission other than sitting fees. Amount entered in "Others" represents sitting fees paid to independent directors for attending Board and Committee Meetings during the financial year 2024-25.

We request you to take the above clarification on your records.

Thanking you,

Yours faithfully,
For Pasupati Acrylon Limited

Bharat Kapoor
Company Secretary & Compliance Officer