

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]

All fields marked in * are mandatory

Refer instruction kit for filing the form



Form language

☒ English ☐ Hindi**I REGISTRATION AND OTHER DETAILS**

i *Corporate Identity Number (CIN)

U24219MH1995PTC464242

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

01/04/2025

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

31/03/2026

(c) *Type of Annual filing

☒ Original☐ Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

Particulars	As on filing date	As on the financial year end date
Name of the company	SUN PETROCHEMICALS PRIVATE LIMITED	SUN PETROCHEMICALS PRIVATE LIMITED
Registered office address	1004 10th Floor ATL Corporate Park,Saki Vihar Road, Powai,Mumbai,Mumbai,Mumbai,Maharashtra,India,400072	1004 10th Floor ATL Corporate Park,Saki Vihar Road, Powai,Mumbai,Mumbai,Mumbai,Maharashtra,India,400072
Latitude details	19.122791	19.122791
Longitude details	72.89151	72.89151

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

office pics.pdf

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

AA*****1E

(c) *e-mail ID of the company

*****tarial@sunpetro.com

(d) *Telephone number with STD code

02*****00

(e) Website

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

21/12/1995

v (a) *Class of Company (as on the financial year end date)

(Private company/Public Company/One Person Company)

Private company

(b) *Category of the Company (as on the financial year end date)

(Company limited by shares/Company limited by guarantee/Unlimited company)

Company limited by shares

(c) *Sub-category of the Company (as on the financial year end date)

(Indian Non-Government company/Union Government Company/State Government Company/
Guarantee and association company/Subsidiary of Foreign Company)

Non-government company

vi *Whether company is having share capital (as on the financial year end date)

☒ Yes

☐ No

vii (a) Whether shares listed on recognized Stock Exchange(s)

☐ Yes

☒ No

(b) Details of stock exchanges where shares are listed

S. No.	Stock Exchange Name	Code

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

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

☒ Yes

☐ No

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

21/07/2026

(c) Due date of AGM (DD/MM/YYYY)

30/09/2026

(d) Whether any extension for AGM granted

☐ Yes

☒ No

(e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *Number of business activities

1

S. No.	Main Activity group code	Description of Main Activity group	Business Activity Code	Description of Business Activity	% of turnover of the company
1	B	Mining and quarrying	6	Extraction of Crude Petroleum & Natural gas	100

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

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

7

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1	U65910MH1989PTC053111		SHANGHVI FINANCE PRIVATE LIMITED	Holding	67.42
2	U35105MH2025PTC448228		SUN HYDRO ENERGY PRIVATE LIMITED	Subsidiary	100
3	U35105MH2025PTC448229		SUN HYDROELECTRIC POWER PRIVATE LIMITED	Subsidiary	100
4	U35105MH2025PTC448230		SUN PUMPED STORAGE ENERGY PRIVATE LIMITED	Subsidiary	100
5	U35105MH2025PTC448372		SUN AQUAPOWER PRIVATE LIMITED	Subsidiary	100
6	U35105MH2025PTC448844		SUN PSH PRIVATE LIMITED	Subsidiary	100
7	U35105MH2025PTC448840		SUN POWER STORAGE PRIVATE LIMITED	Subsidiary	100

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	29999000	9167000	9167000	9167000
Total amount of equity shares (in rupees)	299990000.00	91670000.00	91670000.00	91670000.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Equity				
Number of equity shares	29999000	9167000	9167000	9167000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	299990000.00	91670000.00	91670000.00	91670000.00

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	100	0	0	0
Total amount of preference shares (in rupees)	10000.00	0.00	0.00	0.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
12% Redeemable Non-cumulative Preference Shares				
Number of preference shares	100	0	0	0
Nominal value per share (in rupees)	100	100	100	100
Total amount of preference shares (in rupees)	10000.00	0.00	0.00	0.00

(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	9167000	0	9167000.00	91670000	91670000	
Increase during the year	0.00	9167000.00	9167000.00	91670000.00	91670000.00	
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	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
x Others, specify Dematerialization	0	9167000	9167000.00	91670000	91670000	
Decrease during the year	9167000.00	0.00	9167000.00	91670000.00	91670000.00	
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 Dematerialization	9167000	0	9167000.00	91670000	91670000	
At the end of the year	0.00	9167000.00	9167000.00	91670000.00	91670000.00	
(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	
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 			0.00			
Decrease during the year	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 			0.00			
At the end of the year	0.00	0.00	0.00	0.00	0.00	

ISIN of the equity shares of the company

INE01WA01017

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

0

Class of shares		
Before split / Consolidation	Number of shares	
	Face value per share	
After split / consolidation	Number of shares	
	Face value per share	

iii Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company)

☒ Nil

Number of transfers

Attachments:

1. Details of shares/Debentures Transfers

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

(a) Non-convertible debentures

*Number of classes

0

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

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

(b) Partly convertible debentures

*Number of classes

0

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

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

(c) Fully convertible debentures

*Number of classes

0

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

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

(d) Summary of Indebtedness

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

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	0.00		0.00		0.00

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

i *Turnover

21058421502.98

ii * Net worth of the Company

31126681360.95

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	800000	8.73	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00

	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	7450000	81.27	0	0.00
10	Others 	0	0.00	0	0.00
	Total	8250000.00	90.00	0.00	0.00

Total number of shareholders (promoters)

4

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	0	0.00	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00

	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	917000	10.00	0	0.00
10	Others 	0	0.00	0	0.00
	Total	917000.00	10.00	0.00	0.00

Total number of shareholders (other than promoters)

2

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

6.00

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

Sl.No	Category	
1	Individual - Female	0
2	Individual - Male	1
3	Individual - Transgender	0
4	Other than individuals	5
	Total	6.00

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

0

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	4	4
Members (other than promoters)	2	2
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	8.73	0
B Non-Promoter	4	3	4	3	0.00	0.00
i Non-Independent	4	2	4	2	0	0
ii Independent	0	1	0	1	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	5	3	5	3	8.73	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)
DILIP SHANTILAL SHANGHVI	00005588	Managing Director	800000	
KARISHMA AALOK SHANGHVI	03546211	Whole-time director	0	
VIBHA DILIP SHANGHVI	05007924	Director	0	
VIDHI DILIP SHANGHVI	06497350	Director	0	
JIMMI VAGHJI DESAI	02623717	Director	0	
SAILESH TRAMBAKLAL DESAI	00005443	Director	0	
HITESH RASIKLAL SHETH	10084175	Director	0	
JAYESH NANALAL SHANGHVI	01035365	Director	0	

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

1

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)
SUDHIR VRUNDAVANDAS VALIA	00005561	Director	25/11/2025	Cessation

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

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

*Number of meetings held

3

Type of meeting	Date of meeting (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
Annual General Meeting	11/07/2025	6	6	100
Extra-Ordinary General Meeting	30/07/2025	6	4	90
Extra-Ordinary General Meeting	02/03/2026	6	4	90

B BOARD MEETINGS

*Number of meetings held

6

S.No	Date of meeting (DD/MM/YYYY)	Total Number of directors as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	16/04/2025	9	9	100.00
2	14/06/2025	9	7	77.78
3	28/07/2025	9	7	77.78
4	23/08/2025	9	7	77.78
5	15/11/2025	9	6	66.67
6	14/02/2026	8	8	100.00

C COMMITTEE MEETINGS

Number of meetings held

7

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	14/06/2025	2	2	100.00
2	Audit Committee	23/08/2025	2	2	100.00

3	Audit Committee	15/11/2025	2	2	100.00
4	Audit Committee	14/02/2026	2	2	100.00
5	Corporate Social Responsibility Committee	14/06/2025	3	3	100.00
6	Nomination and Remuneration Committee	16/04/2025	2	2	100.00
7	Risk Management Committee	07/11/2025	2	2	100.00

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	
								21/07/2026 (Y/N/NA)
1	DILIP SHANTILAL SHANGHVI	6	6	100.00	0	0	0.00	Yes
2	KARISHMA AALOK SHANGHVI	6	3	50.00	0	0	0.00	No
3	VIBHA DILIP SHANGHVI	6	5	83.33	1	1	100.00	Yes
4	VIDHI DILIP SHANGHVI	6	6	100.00	0	0	0.00	No
5	JIMMI VAGHJI DESAI	6	6	100.00	5	5	100.00	Yes
6	SAILESH TRAMBAKLAL DESAI	6	6	100.00	2	2	100.00	Yes
7	HITESH RASIKLAL SHETH	6	6	100.00	6	6	100.00	Yes
8	JAYESH NANALAL SHANGHVI	6	5	83.33	1	1	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

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Dilip S. Shanghvi	Managing director	428819400	0	0	0	428819400.00
2	Karishma Aalok Shanghvi	Whole-time director	196914464	0	0	0	196914464.00
	Total		625733864.00	0.00	0.00	0.00	625733864.00

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	Nidhi Vora	Company Secretary	1647036	0	0	0	1647036.00
2	Vishal Mehta	CFO	10631088	0	0	0	10631088.00
	Total		12278124.00	0.00	0.00	0.00	12278124.00

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

4

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Vibha Dilip Shanghvi	Director	203857589	0	0	0	203857589.00
2	Vidhi Dilip Shanghvi	Director	129960785	0	0	0	129960785.00
3	Jimmi Vaghji Desai	Director	21106800	0	0	0	21106800.00
4	Hitesh Sheth	Director	0	0	0	600000	600000.00
	Total		354925174.00	0.00	0.00	600000.00	355525174.00

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

XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or
Debenture
holder_31.03.2026_Sun
Petrochemicals.xlsm

(b) Optional Attachment(s), if any

MGT-8 2025-26_Sun
Petrochemicals_signed.pdf

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

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

I/We certify that:

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

I/ We have examined the registers, records and books and papers of SUN PETROCHEMICALS
PRIVATE 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) 31/03/2026

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we certify that:

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

B During the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:

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

provisions of section 186 of the Act ;
18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

Lalith Kotian

Date (DD/MM/YYYY)

31/07/2026

Place

Mumbai

Whether associate or fellow:

☒ Associate

☐ Fellow

Certificate of practice number

1*6*9

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

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

AKQPV9267L

*(b) Name of the Designated Person

NIDHI SURYAKANT VORA

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 04 dated*

(DD/MM/YYYY) 27/04/2026 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*6*3*1*

***To be digitally signed by**

☒ Company Secretary ☐ Company secretary in practice

***Whether associate or fellow:**

☒ Associate ☐ Fellow

Membership number

4*1*2

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)

AC5478182

eForm filing date (DD/MM/YYYY)

24/08/2026

This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company

LKSC & ASSOCIATES LLP.

Company Secretaries

Reg Office: Office No. 302, Kateeshwari Arcade, LBS Road, Nr Mulund Check Naka,
Mulund (W), Mumbai-400080
Email: lalith@lksc.in, Mob: +91 9702755740

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 have examined the registers, records and books, papers of **SUN PETROCHEMICALS PRIVATE LIMITED (CIN: U24219MH1995PTC464242)** (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 31st March, 2026. 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, 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. The Company has its status under the Act as Private Company which is Active;
2. The Company has maintained proper registers/records & made entries therein within the time prescribed thereof during the financial year;
3. Filing of forms and returns as stated in the annual return, with the Registrar of Companies are within /beyond the prescribed time under the Companies Act, 2013 and the rules made there under. However, no forms or returns were required to be filed with Regional Director, Central Government, the Tribunal, Court or other authorities;;
4. Calling/ convening/ holding meetings of Board of Directors or its committees and the meetings of the members of the company was on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed; **The company has conducted the Extra-Ordinary General Meeting dated 30th July 2025 at Shorter Notice**
5. Closure of Register of Members/ security holders, as the case may be-NOT APPLICABLE;

6. The Company has not given any loans to its Directors and/or persons or firms or companies referred in section 185 of the Act during the financial year; **The Company has obtained approval of the members by way of Special Resolution under Section 185 of the Act for grant of loan(s) that may be required to be given to such person(s)/entity(ies)**
7. Contracts/arrangements with related parties which is on arm length basis and ordinary course of business have been entered as specified in Section 188 of the Companies Act 2013;
8. No 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 taken place during the financial year under review.
9. The Company has not kept 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 during the financial year;
10. The Company has not declared/ paid any dividend or transfer any unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
11. The Company has complied with the provision of 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 during the financial year;
12. The Company has complied with the provisions related to constitution/ appointment/ re-appointment/ resignation disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them during the financial year;
13. Appointment/ reappointment/ filling up casual vacancies of auditors were as per the provisions of Section 139 of the Companies Act, 2013 (No Appointment/ reappointment/ filling up casual vacancies of auditors during the period under review);;
14. The Company was not required to take any approvals from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act during the financial year;
15. The Company has not accepted/ renewed/ repaid any deposits during the financial year;
16. The Company has not filed Charge Forms with Registrar of Companies for creation and modification of Charges during the financial year. There was no satisfaction of charges during the financial year;

17. The Company has given Loans and made investments in other bodies corporates falling under the provisions of section 186 and complied with the provisions of section 186 of the Act. The Company has not given any guarantees or provided any securities to other bodies corporate or persons falling under the provisions of section 186 of the Act during the financial year;
18. The Company has not made any Alteration in the provisions of the Articles of Association of the Company during the financial year; **The Company has made alterations in the provisions of its Memorandum of Association during the financial year in respect of change in the Object Clause and change in the Registered Office of the Company, and the Company has complied with the applicable provisions of the Companies Act, 2013 in relation thereto."**

FOR LKSC & ASSOCIATES LLP
Company Secretaries

LALITH
TUKARAM
KOTIAN



Digitally signed by
LALITH TUKARAM
KOTIAN
Date: 2026.08.21
16:30:13 +05'30'

Lalith Kotian
Designated Partner
ACS No: 44513
CP No: 18649
Peer Review No: 2235/2022
UDIN: A044513H001179856
Date: 21st August, 2026