

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]



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

L24299MH1954PLC009254

Pre-fill

Global Location Number (GLN) of the company

* Permanent Account Number (PAN) of the company

AABCN7072K

(ii) (a) Name of the company

NATIONAL PEROXIDE LIMITED

(b) Registered office address

NEVILLE HOUSE, J N HERDIA ROAD
BALLARD ESTATE,
MUMBAI
Maharashtra
400001

(c) *e-mail ID of the company

secretarial@naperol.com

(d) *Telephone number with STD code

02266620000

(e) Website

www.naperol.com

(iii) Date of Incorporation

16/03/1954

(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	BSE Limited	1

(b) CIN of the Registrar and Transfer Agent

U67190MH1999PTC118368

Pre-fill

Name of the Registrar and Transfer Agent

LINK INTIME INDIA PRIVATE LIMITED

Registered office address of the Registrar and Transfer Agents

C-101, 1st Floor, 247 Park,
Lal Bahadur Shastri Marg, Vikhroli (West)

(vii) *Financial year From date 01/04/2020 (DD/MM/YYYY) To date 31/03/2021 (DD/MM/YYYY)

(viii) *Whether Annual general meeting (AGM) held ☒ Yes ☐ No

(a) If yes, date of AGM

25/08/2021

(b) Due date of AGM

30/09/2021

(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	C	Manufacturing	C6	Chemical and chemical products, pharmaceuticals, medicinal chemical and	100

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

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

3

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1	NOWROSJEE WADIA AND SON	U51900MH1944PLC004225	Holding	55.3
2	NAPEROL INVESTMENTS LIMIT	U65990MH1980PLC022589	Subsidiary	100

3	NPL CHEMICALS LIMITED	U24290MH2020PLC342890	Subsidiary	100
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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	25,000,000	5,747,000	5,747,000	5,747,000
Total amount of equity shares (in Rupees)	250,000,000	57,470,000	57,470,000	57,470,000

Number of classes

1

Class of Shares	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Equity Shares				
Number of equity shares	25,000,000	5,747,000	5,747,000	5,747,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	250,000,000	57,470,000	57,470,000	57,470,000

(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	62,517	5,684,483	5747000	57,470,000	57,470,000	
Increase during the year	0	0	0	39,500	39,500	0
i. Public 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 Dematerialization of Shares				39,500	39,500	0
Decrease during the year	0	0	0	39,500	39,500	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 Dematerialization of Shares				39,500	39,500	
At the end of the year	62,517	5,684,483	5747000	57,470,000	57,470,000	
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

INE585A01020

(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

25/08/2020

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) *Debtentures (Outstanding as at the end of financial year)

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debtentures	0	0	0
Partly convertible debtentures	0	0	0
Fully convertible debtentures	0	0	0
Total			0

Details of debtentures

Class of debtentures	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 debtentures	0	0	0	0
Partly convertible debtentures	0	0	0	0
Fully convertible debtentures	0	0	0	0

(v) Securities (other than shares and debtentures)

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

2,144,735,000

(ii) Net worth of the Company

4,217,006,000

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	20,925	0.36	0	
	(ii) Non-resident Indian (NRI)	5,250	0.09	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)	3,985,484	69.35	0	
10.	Others Foreign Body Corporates	55,000	0.96	0	
	Total	4,066,659	70.76	0	0

Total number of shareholders (promoters)

10

(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	1,441,819	25.09	0	
	(ii) Non-resident Indian (NRI)	36,136	0.63	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	575	0.01	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)	163,175	2.84	0	
10.	Others AIF, NBFC registered with R	38,636	0.67	0	
	Total	1,680,341	29.24	0	0

Total number of shareholders (other than promoters)

18,183

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

18,193

**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	8	10
Members (other than promoters)	17,651	18,183
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	1	0	1	0	0.08
B. Non-Promoter	1	5	1	5	0	0
(i) Non-Independent	1	1	1	1	0	0
(ii) Independent	0	4	0	4	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	6	1	6	0	0.08

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

10

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

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
Mr. Ness N. Wadia	00036049	Director	4,600	
Mr. Rajesh Batra	00020764	Director	0	
Mr. S. Ragothaman	00042395	Director	0	
Dr. Minnie Bodhanwala	00422067	Director	0	
Mr. Viraf Mehta	00352598	Director	0	
Mrs. Harshbeena Zaver	00003948	Director	0	
Mr. Rajiv Arora	08730235	Whole-time director	0	
Mr. Rajiv Arora	AAAPA0362R	CEO	0	
Mr. Conrad Fernandes	AAAPF7147F	CFO	20	
Mr. Chandukumar Parmar	BAFPP6422F	Company Secretary	0	

(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	Nature of change (Appointment/ Change in designation/ Cessation)
Mr. Suresh Khurana	06677496	Whole-time director	04/06/2020	Cessation
Mr. Suresh Khurana	ASKPK1818L	CEO	04/06/2020	Cessation
Mr. Rajiv Arora	08730235	Additional director	04/06/2020	Appointment
Mr. Rajiv Arora	AAAPA0362R	CEO	04/06/2020	Appointment
Mr. Rajiv Arora	08730235	Whole-time director	04/06/2020	Change in designation

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	25/08/2020	20,690	52	0.25

B. BOARD MEETINGS

*Number of meetings held

7

S. No.	Date of meeting	Total Number of directors associated as on the date of meeting	Attendance	
			Number of directors attended	% of attendance
1	04/06/2020	7	7	100
2	14/07/2020	7	7	100
3	25/08/2020	7	7	100
4	21/10/2020	7	7	100
5	03/02/2021	7	7	100
6	09/03/2021	7	6	85.71
7	16/03/2021	7	7	100

C. COMMITTEE MEETINGS

Number of meetings held

16

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 Committee	04/06/2020	3	3	100
2	Audit Committee	25/06/2020	3	3	100
3	Audit Committee	14/07/2020	3	3	100
4	Audit Committee	25/08/2020	3	3	100
5	Audit Committee	21/10/2020	3	3	100
6	Audit Committee	02/02/2021	3	3	100
7	Audit Committee	09/03/2021	3	3	100
8	Audit Committee	30/03/2021	3	3	100
9	Nomination and Remuneration Committee	13/07/2020	3	3	100
10	Nomination and Remuneration Committee	21/10/2020	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	25/08/2021
								(Y/N/NA)
1	Mr. Ness N. W	7	6	85.71	4	3	75	Yes
2	Mr. Rajesh Ba	7	7	100	15	15	100	Yes
3	Mr. S. Ragotha	7	7	100	10	10	100	Yes
4	Dr. Minnie Boc	7	7	100	0	0	0	Yes
5	Mr. Viraf Meht	7	7	100	14	14	100	Yes
6	Mrs. Harshbee	7	7	100	1	1	100	Yes
7	Mr. Rajiv Arora	6	6	100	4	4	100	Yes

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

2

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Mr. Rajiv Arora	Whole-time Dire	13,272,000	0	0	941,000	14,213,000
2	Mr. Suresh Khurana	Whole-time Dire	4,091,000	0	0	310,000	4,401,000
	Total		17,363,000	0	0	1,251,000	18,614,000

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	Mr. Conrad Fernand	CFO	6,784,000	0	0	0	6,784,000
2	Mr. Chandukumar F	Company Secre	1,125,000	0	0	0	1,125,000
	Total		7,909,000	0	0	0	7,909,000

Number of other directors whose remuneration details to be entered

6

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	Mr. Ness N. Wadia	Director	0	1,450,000	0	520,000	1,970,000
2	Mr. Rajesh Batra	Director	0	542,000	0	1,335,000	1,877,000
3	Mr. S. Ragothaman	Director	0	290,000	0	1,100,000	1,390,000
4	Dr. Minnie Bodhanw	Director	0	184,000	0	420,000	604,000
5	Mr. Viraf Mehta	Director	0	164,000	0	1,295,000	1,459,000
6	Mrs. Harshbeena Za	Director	0	0	0	580,000	580,000
	Total		0	2,630,000	0	5,250,000	7,880,000

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

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

Shalini Bhat

Whether associate or fellow

☐ Associate ☒ Fellow

Certificate of practice number

6994

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. ..

22

dated

16/06/2006

(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 complied with. I further declare that:

- 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.
- 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

RAJIV
ARORA Digitally signed by
RAJIV ARORA
Date: 2021.10.14
15:41:48 +05'30'

DIN of the director

08730235

To be digitally signed by

Chandukumar Parmar Digitally signed by
Chandukumar Parmar
Date: 2021.10.14
15:42:46 +05'30'

☒ Company Secretary

☐ Company secretary in practice

Membership number

50299

Certificate of practice number

Attachments

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

Attach

Attach

Attach

Attach

List of attachments

List of Shareholders_NPL.pdf
MGT-8-Signed.pdf
Share Transfer Register_NPL.pdf
Committee Meetings - NPL 2021.pdf

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



National Peroxide Limited

C. COMMITTEE MEETINGS

Number of meetings held: 16

Sr. 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 Committee	04/06/2020	3	3	100
2.	Audit Committee	25/06/2020	3	3	100
3.	Audit Committee	14/07/2020	3	3	100
4.	Audit Committee	25/08/2020	3	3	100
5.	Audit Committee	21/10/2020	3	3	100
6.	Audit Committee	02/02/2021	3	3	100
7.	Audit Committee	09/03/2021	3	3	100
8.	Audit Committee	30/03/2021	3	3	100





National Peroxide Limited

9.	Nomination and Remuneration Committee	13/07/2020	3	3	100
10.	Nomination and Remuneration Committee	21/10/2020	3	3	100
11.	Nomination and Remuneration Committee	16/03/2021	3	2	100
12.	Stakeholders' Relationship Committee	13/07/2020	3	3	100
13.	Corporate Social Responsibility Committee	16/03/2021	3	3	100
14.	Risk Management Committee	19/11/2020	3	3	100
15.	Risk Management Committee	27/01/2021	3	3	100
16.	Strategy Advisory Committee	18/11/2020	3	3	100



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 and papers of NATIONAL PEROXIDE LIMITED (the Company) CIN No. L24299MH1954PLC009254 having its Registered Office at Neville House, J. N. Heredia Road, Ballard Estate, Mumbai - 400001, as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on 31st March, 2021. In our opinion and to the best of our information and according to the examinations carried out by us, the information to the extent provided to us electronically, explanations furnished and representations made to us by the Company, and considering the relaxations granted by the Ministry of Corporate Affairs warranted due to the spread of the COVID-19 pandemic, 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 generally complied with provisions of the Act & Rules made thereunder in respect of:

1. its status under the Act.
2. maintenance of registers/records & making entries therein within the time prescribed thereof;
3. filing of forms and returns as stated in the annual return, with the Registrar of Companies and other authorities;
4. calling/convening/holding meetings of Board of Directors, Committees 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 have been properly recorded in the Minute Books maintained for the purpose.

No Resolution was passed through Postal ballot;

5. closure of Register of Members;
6. no advances/loans have been made to its directors and/or persons or firms or companies referred in section 185 of the Act;
7. there were no contracts/arrangements with related parties as specified in section 188 of the Act except the transactions in the ordinary course of business and which were at arm's length basis;
8. transfer and transmission of shares and issue of security certificates in all instances; as applicable

there was no issue or allotment or buy back of securities/redemption of preference shares or debentures/alteration or reduction of share capital/conversion of shares/ securities during the year;
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 was not required;
10. declaration/ payment of dividend;

transfer of unpaid/unclaimed dividend/ other amounts as applicable to the Investor Education and Protection Fund;
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; as applicable
13. no approvals were 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. the Company has not accepted any Fixed Deposits during the year;

16. borrowings from Non Banking Financial Company and creation of charges in that respect;
- there were no borrowings from directors, members, public financial institutions, banks and others and no modification/satisfaction of charges during the year.
17. loans and investments made to other bodies corporate under the provisions of section 186 of the Act;
- there were no guarantees given or securities provided during the year;
18. there had been no alteration of the provisions of the Memorandum and/ or Articles of Association of the Company during the year.

Place: Mumbai
Date: September 25, 2021

For Parikh & Associates
Company Secretaries

Signature: **SHALINI
MOHAN
BHAT**

Name of the Company Secretary: Shalini Bhat
(Partner)

C.P. No.: 6994
PR-1129/2021

UDIN: F006484C001007385

Digitally signed by SHALINI MOHAN BHAT
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Date: 2021.09.25 15:33:10 +05'30'

This Report is to be read with our letter of even date which is annexed as Annexure A to Form MGT-8 and Forms an integral part of this report.

'Annexure A to Form MGT-8'

To,

NATIONAL PEROXIDE LIMITED

Our Certificate on the Annual Return (Form MGT-8) of even date is to be read along with this letter.

1. Maintenance of Secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in the Annual Return (Form MGT-7). We believe that the process and practices we followed, provide a reasonable basis for our opinion.
3. The Compliance of the provisions of Companies Act, 2013, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of records on test basis.

Place: Mumbai

Date: September 25, 2021

For Parikh & Associates
Company Secretaries

SHALINI
MOHAN
BHAT

Signature:

Name of the Company Secretary: Shalini Bhat
(Partner)

C.P. No.: 6994

PR-1129/2021

UDIN: F006484C001007385

Digitally signed by SHALINI MOHAN BHAT
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