

Annexure- III

Form No. MGT-9

EXTRACT OF ANNUAL RETURN
AS ON THE FINANCIAL YEAR ENDED ON 31.03.2022

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

i.	CIN	L45200GJ2014PLC079847
ii.	Registration Date	19/06/2014
iii.	Name of the Company	Accord Synergy Limited
iv.	Category/Sub-Category of the Company	Public Company (Limited by Shares)
v.	Address of the Registered office and contact details	302, Shine Plaza Natubhai Circle, Race Course, Vadodara- 390007, Gujarat
vi.	Whether listed company	Yes
vii.	Name, Address and Contact details of Registrar and Transfer Agent, if any	Link Intime India Private Limited, Add: 1st Floor, B-102 & 103, Old Padara Rd, Opp. HDFC Bank, Near Radhakrishna Char Rasta, Sheetal Nagar, Akota, Vadodara, Gujarat 390020

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10% or more of the total turnover of the company shall be stated:-

Sr. No.	Name and Description of main products/ services	NIC Code of the Product/ service	% to total turnover of the company
01.	Maintenance and Erection of Telecom Network Towers	42202	100

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

Sr. No.	Name And Address Of The Company	CIN/GLN	Holding/ Subsidiary /Associate	%of shares held	Applicable Section
NA	NA	NA	NA	NA	NA

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% Change during The year
	Demat	Physical	Total	% of Total	Demat	Physical	Total	% of Total	



ACCORD SYNERGY LIMITED

				Share s				Shares	
A. Promoter									
1) Indian									
a) Individual/ HUF	24,99,500	NIL	24,99,500	71.99	24,99,500	NIL	24,99,500	71.99	Nil
b) Central Govt	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) State Govt(s)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) Bodies Corp	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
e) Banks / FI	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
f) Any Other	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Subtotal (A)(1):-	24,99,500	NIL	24,99,500	71.99	24,99,500	NIL	24,99,500	71.99	(27.99)
2) Foreign									
a) NRIs- Individuals	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
b) Other- Individuals	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Bodies Corp.	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) Banks / FI	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
e) Any Other....	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Sub-total (A)(2):-	24,99,500	NIL	24,99,500	71.99	24,99,500	NIL	24,99,500	71.99	Nil
B. Public Shareholding									
1. Institutions									
a) Mutual Funds	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
b) Banks / FI	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
c) Central Govt	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
d) State Govt(s)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
e) Venture Capital Funds	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
f) Insurance Companies	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
g) FIs	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
h) Foreign Venture Capital Funds	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
i) Others (specify)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil



ACCORD SYNERGY LIMITED

Sub-total (B)(1)	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
2. Non Institutions									
a) Bodies Corp. (i) Indian (ii) Overseas	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
b) Individuals									
(i) Individual shareholders holding nominal share capital upto Rs. 2 lakh	5,14,500	Nil	5,14,500	14.81	0.34	Nil	4,90,500	14.13	0.68
(ii) Individual shareholders holding nominal share capital in excess of Rs 2 lakh	3,12,000	Nil	3,12,000	8.99	0.75	Nil	3,74,000	10.77	-1.78
c) Others	1,46,000	Nil	1,46,000	4.21	0.41	Nil	1,08,000	3.11	0.41
i. HUF	80,000	Nil	80,000	2.31	0.29	Nil	58,000	1.68	0.29
ii.NRI	0	Nil	0	0	-0.05	Nil	0	0	0
iii.Clearing Member	4,000	Nil	4,000	0.11	0	Nil	0	0	0.11
iv. Body Corp-Ltd Liability Partnership	0	Nil	0	0	0	Nil	14,000	0.40	0
iv.Bodies Corporate	62000	Nil	62000	1.79	0.06	Nil	36,000	1.04	0.75
Sub-total (B)(2)	9,72,500	Nil	9,72,500	28.01	9,72,500	Nil	9,72,500	28.01	Nil
Total Public Shareholding (B)= (B)(1)+(B)(2)	9,72,500	Nil	9,72,500	28.01	9,72,500	Nil	9,72,500	28.01	Nil
C. Shares held by Custodian for GDRs & ADRs	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil	Nil
Grand Total (A+B+C)	34,72,000	Nil	34,72,000	100	34,72,000	Nil	34,72,000	100	-

i. Category wise shareholding

(ii) Shareholding of Promoters:

Sr. No.	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% Change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1	Betulla Asdulla Khan	12,50,000	36.00	Nil	12,50,000	36.00	Nil	-
2	Roli Betulla Khan	12,49,500	35.99	Nil	12,49,500	35.99	Nil	-
	Total	24,99,500	99.98	Nil	24,99,500	71.99	Nil	-

(iii) Change in Promoters' Shareholding: No Change

Sr. No.	Particulars	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total Shares of the Company	No. of shares	% of total Shares of the Company
1	Name of Promoter				
1.	At the beginning of the year				
2.	Date wise increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc.)				
3.	At the end of the year				

(iv) Shareholding Pattern of top ten Shareholders (Other than Directors, Promoters and Holders of GDRs and ADRs):

Sl. No.	Name	Shareholding at the beginning of the year		Shareholding at the end of the year	
		No. of shares	% of total Shares of the Company	No. of shares	% of total Shares of the Company
	For Each of the Top 10 Shareholders				
1.	Manoj Agarwal	66,000	1.90	90,000	2.59
2.	Hem Securities Ltd.	48,000	1.38	36,000	1.04
3.	Riaz Ahmed Khatri	24,000	0.69	24,000	0.69
4.	Seema Gandhi	18,000	0.52	18,000	0.52
5.	Geeta Sanjaybhai Gambhava	16000	0.46	0	0
6	Sonal Amrit Gandhi	14,000	0.40	14,000	0.40



7	AS Finalysis Ventures LLP	14,000	0.40	14,000	0.40
8	Madho Bihari Kabra HUF	10,000	0.29	0	0
9	Sharmila Rajdeep Desai	10,000	0.29	0	0
10	Adheesh Kabra	10,000	0.29	10,000	0.29

(v) Shareholding of Directors and Key Managerial Personnel:

Sr. No.	Name	Particulars	Shareholding at the Beginning of the year		Cumulative Shareholding at the end of the year	
			No. of shares	% of total Shares of the Company	No. of shares	% of total Shares of the Company
1.	BETULLA ASDULLA KHAN	Managing Director	12,50,000	50	12,50,000	50
2.	ROLI BETULLA KHAN	Whole Time Director	12,49,500	49.98	12,49,500	49.98
3.	RAMESHJI CHANDUJI THAKOR	CFO	100	0.004	100	0.004

V. INDEBTEDNESS

Indebtedness of the company including interest outstanding/ accrued but not due for payment

Particulars	Secured Loans excluding deposits (Rs.)	Unsecured Loans (Rs.)	Deposits (Rs.)	Total Indebtedness (Rs.)
Indebtedness at the beginning of the financial year				
I) Principal Amount	Nil	29,454,154	Nil	29,454,154
ii) Interest due but not paid	Nil	Nil	Nil	Nil
iii) Interest accrued but not due	Nil	Nil	Nil	Nil
Total (I + ii + iii)	Nil	29,454,154	Nil	29,454,154
Change in Indebtedness during the financial year				
Addition	Nil	Nil	Nil	Nil
Reduction	Nil	(12,904,154)	Nil	(12,904,154)
Net Change	Nil	(12,904,154)	Nil	(12,904,154)
Indebtedness at the end of the financial year	Nil			
I) Principal Amount	Nil	16,550,000	Nil	16,550,000
ii) Interest due but not paid	Nil	Nil	Nil	Nil
iii) Interest accrued but not due	Nil	Nil	Nil	Nil
Total (I + ii + iii)	Nil	16,550,000	Nil	16,550,000

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Director and/ or Manager: (In Rs.)

B.

SR. No	Particular of Remuneration	Name of MD/ WTD/ Manager	Total Amount
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	Name of MD/ WTD/ Manager	Betulla Asdulla Khan (MD)	Ritu Negi (WTD)	Roli Khan (WTD)	
1.	Gross salary (Rs.)				
	(a) Salary as per provisions contained in section 17(1) of the Income Tax Act, 1961.	45,88,105	12,02,400	5,26,036	63,16,541
	(b) Value of perquisites u/s 17(2) Income Tax Act, 1961.	-	-		-
	(c) Profits in lieu of salary under section 17(3) Income Tax Act, 1961.	-	-		-
2	Stocks Option	-	-		-
3	Sweat Equity	-	-		-
4	Commission	-	-		-
	- As % of profit	-	-		-
	- Other , specify	-	-		-
5	Others, Please specify	-	-		-
	Total (A)	45,88,105	12,02,400	5,26,036	63,16,541

B. Remuneration to other Directors:

1. Independent Directors

Sr. No.	Particular of Remuneration	Name of the Director		Total Amount
	1. Independent Directors	Rajnikant Prabhudas Mandavia	Tushar Arvind Shah	-
	<ul style="list-style-type: none"> • Fees for attending Board /Committee meetings • Commission • Other, Please specify 	-	-	-
	Total (1)	-	-	-
	2. Other Non-Executive Directors	Asdulla Khan Pathan		
	<ul style="list-style-type: none"> • Fees for attending board committee meetings • Commission • Other, Please specify 	-	-	-
	Total (2)	-	-	-
	Total (B) = (1+2)	-	-	-

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

Sr. No.	Particulars of Remuneration	Key Managerial Personnel	
		Mr. Rameshji Chanduji Thakor, CFO (Amount in Rs.)	Mrs. Namrata Singhal (Amount in Rs.)
1.	Gross Salary	-	(ii) Mrs. Kirti Bhavesh Chauhan: Rs. 2,54,400/-
	(a) Salary as per provisions contained in Section 17(1) of the Income-tax Act, 1961	-	-
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-
	(c) Profits in lieu of salary under Section 17(3) Income-tax Act, 1961	-	-
2.	Stock Option	-	-
3.	Sweat Equity	-	-
4.	Commission - as % of Profit - Others, specify....	-	-
5.	Others, please specify	-	-
	Total	-	2,54,400/-

VII. PENALTIES / PUNISHMENT / COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty			None		
Punishment					
Compounding					
B. DIRECTORS					
Penalty			None		
Punishment					
Compounding					
C. OTHER OFFICERS IN DEFAULT					
Penalty					



ACCORD SYNERGY LIMITED

Punishment	None
Compounding	

For and on behalf of the Board

**Place: Vadodara
Date: 20th August, 2022**

**Sd/-
Chairman
Asdullakhan Pathan
DIN – 01952438**