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]



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) — L27320CT2017PLC007918

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	SAMBHV STEEL TUBES LIMITED	SAMBHV STEEL TUBES LIMITED
Registered office address	Office No. 501 to 511 Harshit Corporate, Amanaka,NA,Raipur,Raipur,Chattisgarh,India,492001	Office No. 501 to 511 Harshit Corporate, Amanaka,NA,Raipur,Raipur,Chattisgarh,India,492001
Latitude details	21.253143171	21.253143171
Longitude details	81.59694356	81.59694356

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

(b) *Permanent Account Number (PAN) of the company — AA******0C

(c) *e-mail ID of the company — *****MBHV.COM

(d) *Telephone number with STD code — +91********60

(e) Website: www.sambhv.com

iv *Date of Incorporation (DD/MM/YYYY): 24/04/2017

v (a) *Class of Company (as on the financial year end date)
(Private company/Public Company/One Person Company): Public 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): Indian 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: 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
L72400MH2017PLC444072	KFIN TECHNOLOGIES LIMITED	301, The Centrium, 3rd Floor, 57,, Lal Bahadur Shastri Road, Nav Pada, Kurla (West),Mumbai,Mumbai,Maharashtra,India,400070	INR000000221

ix * (a) Whether Annual General Meeting (AGM) held: (●) Yes ( ) No

(b) If yes, date of AGM (DD/MM/YYYY): 10/09/2026

(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	C	Manufacturing	24	Manufacture of basic metals	100

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

i *No. of Companies for which information is to be given: 2

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Joint Venture	% of shares held
1	U35105MH2023PTC415117		CLEAN MAX OPIA PRIVATE LIMITED	Associate	0.00
2	U27209CT2020PTC010822		SAMBHV TUBES PRIVATE LIMITED	Subsidiary	100.00

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	1000000000.00	294671429.00	294671429.00	294671429.00
Total amount of equity shares (in rupees)	10000000000.00	2946714290.00	2946714290.00	2946714290.00

Number of classes | 1

Class of shares ORDINARY EQUITY SHARES	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	1000000000	294671429	294671429	294671429
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	10000000000	2946714290	2946714290	2946714290

(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

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	2474000	238528000	241002000.00	2410020000	2410020000	
Increase during the year	0.00	53935929.00	53935929.00	539359290.00	539359290.00	0
i Public Issues	0	53669429	53669429.00	536694290	536694290	
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 Due to De-materialization of Physical shares held	0	266500	266500.00	2665000	2665000	
Decrease during the year	266500.00	0.00	266500.00	2665000.00	2665000.00	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	
iv Others, specify Due to De-materialization of Physical shares held	266500	0	266500.00	2665000	2665000	
At the end of the year	2207500.00	292463929.00	294671429.00	2946714290.00	2946714290.00	
(ii) Preference shares						

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
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	0	0	0.00	0	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	0	0	0.00	0	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: INE12NJ01018

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	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	24132432421
ii * Net worth of the Company	10554294850

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	86660726	29.41	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)	0	0.00	0	0.00

10	Others				
	Total	86660726.00	29.41	0.00	0

Total number of shareholders (promoters) 6

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	173293949	58.81	0	0.00
	(ii) Non-resident Indian (NRI)	2295171	0.78	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	4489524	1.52	0	0.00
7	Mutual funds	4161689	1.41	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	18820835	6.39	0	0.00

10	Others ALTERNATE INVESTMENT	4949535	1.68	0	0.00
	Total	208010703.00	70.59	0.00	0

Total number of shareholders (other than promoters) 71303

Total number of shareholders (Promoters + Public/Other than promoters) 71309.00

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

Sl.No	**Category**	
1	Individual - Female	17085
2	Individual - Male	38579
3	Individual - Transgender	1
4	Other than individuals	15644
	Total	71309.00

C Details of Foreign institutional investors' (FIIs) holding shares of the company 9

Name of the FII	**Address**	**Date of Incorporation**	**Country of Incorporation**	**Number of shares held**	**% of shares held**
ASHOKA INDIA EQUITY INVESTMENT TRUST PLC	6th Floor 125 London Wall London	11/05/2018	India	2056600	0.7
ASHOKA WHITEOAK ICAV - ASHOKA WHITEOAK EMERGING M ARKETS EQUITY FUND	3RD FLOOR 55 CHARLEMONT PLACE DUBLIN2 DUBLIN DUBLIN	11/05/2018	India	1571388	0.52
ASTORNE CAPITAL VCC - ARVEN	19-96 The Central 8 EU Tong Sen Street SINGAPORE SINGAPORE	11/05/2018	India	515505	0.17
ASHOKA WHITEOAK EMERGING MARKETS TRUST PLC	18th Floor The Scalpel 52 Lime Street LONDON LONDON	11/05/2018	India	132882	0.05

QUADRATURE TRADING VCC - SUB-FUND NO. 1	JPMorgan Chase Bank, N.A. India Sub Custody 3rd Flr,JP Morgan Tower,Off CST Road Kalina, Santacruz East, Mumbai	11/05/2018	India	102563	0.03
RED BAY LTD	C/O VENTURE CORPORATE SERVICES (MAURITIUS) LIMITED LEVEL 3 TOWER I NEXTERACOM TOWERS CYBERCITY EBENE	11/05/2018	Mauritius	44511	0.02
MORGAN STANLEY ASIA (SINGAPORE) PTE. - ODI	2 Central Boulevard #22-01 West Tower IOI Central Boulevard Towers	11/05/2018	India	31077	0.01
NAUTILUS PRIVATE CAPITAL LTD	C/O ONS FINSERV LTD HOTEL AVENUE 11TH FLOOR BRAMER HOUSE EBENE CYBERCITY	11/05/2018	India	18500	0.01
CITADEL SECURITIES SINGAPORE PTE. LIMITED	22-01 and #22-02 Asia Square Tower 2 12 Marina View Singapore Singapore	11/05/2018	India	16498	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	6	6
Members (other than promoters)	480	71303
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	2	0	2	0	12.58	0
B Non-Promoter	1	3	2	5	1.58	0.00

i Non-Independent	1	0	2	0	1.58	0
ii Independent	0	3	0	5	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	3	3	4	5	14.16	0.00

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date | 12

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)
SURESH KUMAR GOYAL	00318141	Director	18536250	
VIKAS KUMAR GOYAL	00318182	Managing Director	18536250	
SHARAD CHANDAK	11100096	Director	0	
SAURABH PATIL	11265825	Director	0	
SARBESH KUMAR DAS	03613327	Director	0	
KISHORE KUMAR SINGH	00097156	Director	0	
MANOJ KHETAN	06395265	Director	0	
NIDHI THAKKAR	07587986	Director	0	
VIKAS KUMAR GOYAL	00318182	CEO	18536250	
BHAVESH KHETAN	10249740	Director	4666660	
NIRAJ SHRIVASTAVA	CGBPS1019N	Company Secretary	2002	
ANU GARG	BRBPG4465Q	CFO	86006	

B (ii) *Particulars of change in director(s) and Key managerial personnel during the year 6

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)
SARBESH KUMAR DAS	03613327	Additional Director	30/08/2025	Appointment
SAURABH PATIL	11265825	Additional Director	30/08/2025	Appointment
SARBESH KUMAR DAS	03613327	Director	29/09/2025	Change in designation
SAURABH PATIL	11265825	Director	29/09/2025	Change in designation
SHARAD CHANDAK	11100096	Additional Director	31/01/2026	Appointment
SHARAD CHANDAK	11100096	Director	21/03/2026	Change in designation

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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 (DD/MM/YYYY)	Total Number of Members entitled to attend meeting	Attendance	
			Number of members attended	% of total shareholding
ANNUAL GENERAL MEETING	29/09/2025	78918	56	36.1

B BOARD MEETINGS

*Number of meetings held 12

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	24/05/2025	6	4	66.67

2	02/06/2025	6	6	100
3	09/06/2025	6	4	66.67
4	19/06/2025	6	5	83.33
5	19/06/2025	6	4	66.67
6	28/06/2025	6	4	66.67
7	14/07/2025	6	4	66.67
8	24/07/2025	6	5	83.33
9	30/08/2025	6	5	83.33
10	08/11/2025	8	6	75
11	08/12/2025	8	5	62.5
12	31/01/2026	8	7	87.5

C COMMITTEE MEETINGS

Number of meetings held: 25

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 MEETING	28/05/2025	4	3	75
2	AUDIT COMMITTEE MEETING	02/06/2025	4	4	100
3	AUDIT COMMITTEE MEETING	19/06/2025	4	3	75
4	AUDIT COMMITTEE MEETING	14/07/2025	4	4	100
5	AUDIT COMMITTEE MEETING	24/07/2025	4	4	100
6	AUDIT COMMITTEE MEETING	30/08/2025	4	3	75
7	AUDIT COMMITTEE MEETING	08/11/2025	4	3	75

8	AUDIT COMMITTEE MEETING	31/01/2026	4	4	100
9	NOMINATION AND REMUNERATION COMMITTEE	30/08/2025	3	2	66.67
10	NOMINATION AND REMUNERATION COMMITTEE	31/01/2026	3	3	100
11	FINANCE COMMITTEE MEETING	14/07/2025	3	2	66.67
12	FINANCE COMMITTEE MEETING	29/09/2025	3	2	66.67
13	FINANCE COMMITTEE MEETING	01/12/2025	3	2	66.67
14	FINANCE COMMITTEE MEETING	08/01/2026	3	2	66.67
15	FINANCE COMMITTEE MEETING	02/02/2026	3	2	66.67
16	FINANCE COMMITTEE MEETING	09/03/2026	3	3	100
17	FINANCE COMMITTEE MEETING	31/03/2026	3	2	66.67
18	IPO COMMITTEE MEETING	17/06/2025	3	2	66.67
19	IPO COMMITTEE MEETING	24/06/2025	3	2	66.67
20	IPO COMMITTEE MEETING	30/06/2025	3	2	66.67
21	CSR COMMITTEE MEETING	23/06/2025	3	3	100
22	CSR COMMITTEE MEETING	11/08/2025	3	3	100
23	STAKEHOLDERS RELATIONSHIP COMMITTEE	31/03/2026	4	4	100
24	RISK MANAGEMENT COMMITTEE	18/10/2025	3	2	66.67
25	RISK MANAGEMENT COMMITTEE	31/10/2025	3	2	66.67

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	10/09/2026 (Y/N/NA)
1	SURESH KUMAR GOYAL	12	8	66	14	12	85	Yes
2	VIKAS KUMAR GOYAL	12	9	75	21	17	80	Yes
3	SHARAD CHANDAK	0	0	0	0	0	0	Yes
4	SAURABH PATIL	3	3	100	0	0	0	Yes
5	SARBESH KUMAR DAS	3	2	66	0	0	0	Yes
6	KISHORE KUMAR SINGH	12	9	75	10	9	90	No
7	MANOJ KHETAN	12	9	75	11	11	100	Yes
8	NIDHI THAKKAR	12	8	66	22	13	59	Yes
9	BHAVESH KHETAN	12	11	91	6	6	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: 1

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	VIKAS KUMAR GOYAL	Managing Director	18000000	0	0	0	18000000.00
	Total		18000000.00	0.00	0.00	0.00	18000000.00

B *Number of CEO, CFO and Company secretary whose remuneration details to be entered: 3

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	VIKAS KUMAR GOYAL	CEO	18000000	0	0	0	18000000.00
2	ANU GARG	CFO	3431000	0	0	0	3431000.00

3	NIRAJ SHRIVASTAVA	Company Secretary	1943172	0	0	0	1943172.00
	Total		23374172.00	0.00	0.00	0.00	23374172.00

C *Number of other directors whose remuneration details to be entered | 8

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	SURESH KUMAR GOYAL	Director	18000000	0	0	0	18000000.00
2	BHAVESH KHETAN	Director	11000000	0	0	0	11000000.00
3	SHARAD CHANDAK	Director	0	100000	0	0	100000.00
4	SAURABH PATIL	Director	1766129	0	0	0	1766129.00
5	SARBESH KUMAR DAS	Director	0	0	0	100000	100000.00
6	KISHORE KUMAR SINGH	Director	0	0	0	900000	900000.00
7	MANOJ KHETAN	Director	0	0	0	1000000	1000000.00
8	NIDHI THAKKAR	Director	0	0	0	1050000	1050000.00
	Total		30766129.00	100000.00	0.00	3050000.00	33916129.00

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: 72077

XIV Attachments

(a) List of share holders, debenture holders: Details of Shareholder or Debenture holder.xlsm

(b) Optional Attachment(s), if any:
CLARIFICATION AND MGT-8_.pdf
4._SSTL_MGT-7_List of Shareholders_31.03.2026-1031-1361.pdf
2._SSTL_MGT-7_List of Shareholders_31.03.2026-311-660.pdf
1._SSTL_MGT-7_List of Shareholders_31.03.2026-1-310.pdf
3._SSTL_MGT-7_List of Shareholders_31.03.2026-661-1030.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 | SAMBHV STEEL TUBES 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

ROHTASH KUMAR AGRAWAL Digitally signed by ROHTASH KUMAR AGRAWAL Date: 2026.10.30 19:29:05 +05'30'

Name: Rohtash Kumar Agrawal

Date (DD/MM/YYYY): 24/10/2026

Place: Raipur

Whether associate or fellow:

○ Associate ◉ Fellow

Certificate of practice number: 4*1*

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

*(a) DIN/PAN/Membership number of Designated Person: 00318182

*(b) Name of the Designated Person: VIKAS KUMAR GOYAL

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 13 dated* (DD/MM/YYYY) 03/08/2026 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**

VIKAS KUMAR GOYAL Digitally signed by VIKAS KUMAR GOYAL Date: 2026.10.30 19:21:15 +05'30'

*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*3*8*8*

***To be digitally signed by**

NIRAJ SHRIVASTAVA Digitally signed by NIRAJ SHRIVASTAVA Date: 2026.10.30 19:22:20 +05'30'

◉ Company Secretary ○ Company secretary in practice

*Whether associate or fellow:

○ Associate ◉ Fellow

Membership number: 8*5*

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): AC6841155

eForm filing date (DD/MM/YYYY): 30/10/2026

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