GENERAL MANAGER &
ADJUDICATING OFFICER

Through SPAD/Email

SEBI/EAD/SM/MKG/18185/1/2021
August 05, 2021

1.	**RFL International limited (PAN: AAACR9384B)** 304, Akruti Complex, Near stadium Six Road Circle, Navrangpura, Ahmedabad-380009 **Email-** rflltd109@gmail.com	2.	**Shri Anish Shah (DIN-00372544)** B-9, Pratik Tower, Jintan Road, Surendra nagar, Baroda, Gujarat 363002

Notice under Rule 4(1) of SEBI (Procedure for Holding Inquiry and imposing penalties) Rules, 1995 and Rule 4(1) of SC(R)A (Procedure for Holding Inquiry and imposing penalties) Rules, 2005 in the matter of "Allotment of shares by RFL International Limited"

1. RFL International Limited (hereinafter referred to as '**Noticee 1/by name/RFL/ Company**) is a company having its shares listed on BSE Ltd. (hereinafter referred to as '**BSE**'). Securities and Exchange Board of India (hereinafter referred to as '**SEBI**') while investigating another matter, received copies of share certificates dated April 21, 2011 of RFL from certain entities. However, no change in shareholding of RFL was observed by SEBI for the quarter ended March 2011 to June 2011. Thereafter, SEBI conducted investigation in the matter of RFL for the period January 01, 2011 to June 30, 2011 (hereinafter referred to as '**Investigation Period/IP**'). Based on investigation, SEBI observed certain violations of provisions of SEBI Act, 1992, (hereinafter referred to as '**SEBI Act**'), SEBI (Prohibition of Fraudulent and Unfair Trade Practices) Regulations, 2003 (hereinafter referred to as '**PFUTP Regulations**') and Listing Agreement read

सेबी भवन, प्लॉट सं. सी 4-ए, "जी" ब्लॉक, बांद्रा-कुर्ला कॉम्प्लेक्स, बांद्रा (पूर्व), मुंबई - 400 051.
दूरभाष : 2644 9950 / 4045 9950 (आई.वी.आर.एस.), 2644 9000 / 4045 9000 फैक्स : 2644 9019 से 2644 9022 वेब : www.sebi.gov.in

SEBI Bhavan, Plot No. C4-A, "G" Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051.
Tel.: 2644 9950 / 4045 9950 (IVRS), 2644 9000 / 4045 9000 Fax : 2644 9019 to 2644 9022 Web : www.sebi.gov.in

with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, (hereinafter referred to as **'LODR Regulations'**).

2. Vide Order dated March 04, 2021 (**Annexure I** – Copy of Appointment order), SEBI appointed the undersigned as the Adjudicating Officer under Section 19 read with Section 15-I of SEBI Act and 23I of the Securities Contracts (Regulation) Act, 1956 (hereinafter referred to as '**SCRA**') and Rule 3 of SEBI (Procedure for Holding Inquiry and Imposing Penalties) Rules, 1995 (hereinafter referred to as **'SEBI Adjudication Rules'**) and Rule 3 of SCRA (Procedure for Holding Inquiry and Imposing Penalties) Rules, 2005 (hereinafter referred to as **'SCRA Adjudication Rules'**) to inquire into and adjudge under the provisions of-

2.1. Section 15A(a) of the SEBI Act, the alleged violation of Sections 11C(2) and 11C(3) of SEBI Act by Noticee 1;

2.2. Sections 23A(a), 23E and 23F of SCRA, the alleged violation of clause 22, 24(a) and clause 30(b) of the Listing Agreement read with regulation 103 of the LODR Regulations by Noticee 1;

2.3. Section 15HA of SEBI Act, the alleged violation of Sections 12A(a), (b), (c) of SEBI Act, read with Regulations 3(a), (b), (c), (d) and 4(1) of PFUTP Regulations by Shri Anish Shah (hereinafter referred to as '**Noticee 2/ by name**') and Noticee 1 (Collectively Noticee 1 and 2 are referred as '**Noticees'**);

the alleged irregularities in the scrip of RFL.

3. RFL International Limited is a Public company incorporated on September 10, 1992. It is classified as Non-Govt company and is registered at Registrar of Companies, Ahmedabad. Its authorized share capital is Rs. 55,000,000 and its paid up capital is Rs. 50,855,000. The main object of RFL is to undertake all kinds of financial operations including equity participations and to provide investment, financial and corporate services like leasing, hire purchase, bill discounting, inter corporate deposits, short term loans etc. The registered office

address of the company is at 304, Akruti Complex, near stadium six cross – Road circle, Navrangpura Ahmedabad, Gujarat-380009.

4. During investigation, SEBI observed certain violations which are mentioned in the subsequent paragraphs.

5. **Non-compliance of Summonses by Noticee 1-**

5.1. Summons dated January 04, 2019 was issued to Noticee 1 by Investigating Authority (Herein after referred to as '**IA**') during course of investigation at the address, RFL International Limited Room No. 21, Old shanti nagar, Opp. Jain Temple, Chamunda Circle, Borivali-west, Mumbai-400092. Through the aforesaid summons RFL was asked to provide certified copies of the Minute book in respect of the proceedings of every meeting of the Board of directors of RFL as required to be maintained in terms of section 193 of the Companies Act 1956 and section 118 of Companies Act, 2013, for the period from financial year 2009-10 till January 04, 2019. The said summons was duly served upon Noticee 1. SEBI observed that Noticee 1 did not reply to the summons ever after two reminders dated January 09 and 18, 2019.

5.2. Thereafter, another summons dated April 01, 2019 was issued to Noticee 1 and sent to the registered office address (as available in MCA website) of Noticee 1 i.e. RFL International Limited, 304, Akruti Complex, Near Stadium, Six cross Road circle, Navrangpura, Ahmedabad, Gujarat-380009 and also at the corporate address (as provided to SEBI by RFL vide mail dated 25/10/2018) i.e. RFL International Limited Room No. 21, Old shanti nagar, Opp. Jain Temple, Chamunda Circle, Borivali-west, Mumbai-400092. The aforesaid summons was issued referring to the earlier summons dated January 04, 2019 as well as asking for following additional queries as under:--

- *"Confirm whether any shares were issued by RFL International Limited (hereinafter also referred to RFL and/or the company) on April 21, 2011. If yes,*

provide specific details relating to the shares issued by the company if any, on April 21, 2011.

- *Provide complete details in respect of any share certificate(s) dated April 21, 2011, issued by RFL, if any along with copies of all such share certificates.*
- *Provide the capital buildup (i.e. Equity shares capital history) of RFL International Limited (RFL) since inception to till date as per the format below: "*

Table-1

Date	*Nature of Event (Say Allotment / Buyback / Subdivision of Shares etc.)*	*Details of allotment/buyback/sub-division*			*Total issued capital before the event (number of shares)*	*Total issued capital after the event number of shares)*
		Number of shares	*Price*	*Number of allottees/ shareholders*		

5.3. Subsequently, two reminder letters dated April 10, 2019 and April 23, 2019 were issued to Noticee 1 and sent to the aforesaid addresses of Noticee 1. Further, it was observed that summons dated 01/04/2019 and reminder letters dated 10/04/2019 and 23/04/2019 addressed to corporate address were also served upon Noticee 1.

5.4. SEBI observed that in absence of any reply from Noticee 1, the extent of the issue of shares by the company could not be established and the investigation only relied upon the information gathered from the other sources and hence the exact number of shares allotted and the number of allottees are not known. SEBI further observed that failure to reply to the summonses dated January 04, 2019 and April 01, 2019 by the company has hindered the investigation.

5.5. In view of the fact that Noticee 1 did not reply to the summonses dated January 04, 2019 and April 01, 2019 and failed to furnish the documents/ information to IA as required under Sections 11C(2) and 11C(3) of SEBI Act., it is alleged that Noticee 1 violated Sections 11C(2) and 11C(3) of SEBI Act.

6. **Violation of Listing Agreement, LODR Regulations and SCRA by the Noticee 1**

6.1. SEBI observed that three share certificates were issued by Noticee 1 in the names of Mrs. Tasneem Iqbal Syed for 100000 equity shares, Subhash Tikamdas Mithawala for 75000 equity shares and Jignasa Subhash Mithawalla for 75000 equity shares of face value of Rs.10/- each. It was stated in the share certificates that the shares are not to be sold/transferred/ hypothecated until April 20, 2012.

6.2. In this respect, SEBI sought for information from BSE to which BSE furnished its reply vide its emails dated 10/08/2017 and 31/08/2017. From the aforesaid BSE replies, SEBI observed the following:-

i) Noticee 1 did not make any application to the exchange for allotment of shares on preferential basis during April 2011. The only application made by Noticee 1 during 2011-12 was for in-principal approval of 80 lakh equity shares on preferential basis on October 28, 2011. BSE, vide its letter dated January 13, 2012, had granted in-principle approval for issue of 76,60,000 equity shares on preferential basis. The list of 49 allottees for the aforesaid preferential allotment is enclosed at annexure to the SCN.

ii) However, Noticee 1 had neither approached exchange for listing nor provided any information with regard to making allotment of the aforesaid shares.

6.3. SEBI observed from list of 49 allottees of proposed preferential allotment that names of entities viz. Jignsasa Subhash Mithawalla, Subhash Tikamdas Mithawalla, Mrs. Tasneem Iqbal Syed and Santlal Jaiswal were appearing in the list of the proposed 49 allottees of the preferential allottees. Therefore, SEBI issued letters to all the 49 allottees whose names were appearing in the proposed list of allottees. Out of these, seven entities *inter-alia* replied to SEBI.

6.4. In this regard, the aforesaid entities viz. Mrs. Tasneem Iqbal Syed, Subhash Tikamdas Mithawala, Jignasa Subhash Mithawalla and Santlal Jaiswal in their reply to SEBI's queries, *inter-alia* informed vide their letters dated 10/10/2018, 02/10/2018, 02/10/2018 and 15/10/2018 respectively, as under-

a) *These entities came to know about the proposed issue of RFL from their friend circle/ share market consultant;*
b) *They had applied for the preferential allotment;*
c) *They had made payments to the company for the same.*

6.5. The details of such payments, as observed from the bank statements of the aforesaid four entities as well as that of RFL, are as under:

Table-2

Name of the entity	Bank account number and Bank name	Amount (in Rs.)	Date on which amount debited	Date on which amount credited to RFL	Account number and Bank Name, to which funds were credited
Mrs. Tasneem Iqbal Syed	2677101004261 (Canara Bank)	10,00,000	28/01/2011	28/01/2011	003010200073130 (Axis bank)
Subhash Tikamdas Mithawala	SB/15008 (The Kapol Co-operative Bank)	7,50,000	24/02/2011	24/02/2011	
Jignasa Subhash Mithawalla	SB/15007(The Kapol Co-operative Bank	7,50,000	24/02/2011	24/02/2011	
Santlal Jaiswal	101/1902 (Bharat Cooperative Bank (Mumbai) Ltd)	11, 50,000	08/02/2011	08/02/2011	

6.6. SEBI observed from the bank account statements of aforesaid entities that counter party of the above fund transactions mentioned in Table - 2 of Mrs. Tasneem Iqbal Syed, Subhash Tikamdas Mithawala, Jignasa Subhash Mithawalla and Santlal Jaiswal was Noticee 1 and the amounts were credited to the Axis Bank Account No. 003010200073130 pertaining to Noticee 1. SEBI also observed that the amounts paid by the allottees matched with the amounts payable by them in terms of the allotted shares to each of them respectively (i.e. number of shares multiplied by Rs. 10/-). In view of the same, SEBI observed that aforesaid four entities made payments (as enumerated above) to Noticee 1 with the intention of getting allotment of equity shares in the

company. In return, Noticee 1 issued equity shares to the abovementioned entities vide share certificates dated April 21, 2011.

6.7. In view of the above, it is alleged that Noticee 1 had issued shares through share certificate dated April 21, 2011 to Jignsasa Subhash Mithawalla, Subhash Tikamdas Mithawalla, Mrs. Tasaneemiqbal Syed and Santlal Jaiswal.

6.8. With regard to issue of share certificates dated April 21, 2011, SEBI sought the details about the corporate officer address, name and phone number of the compliance officer, company secretary and directors etc from Noticee 1. In this regard, Noticee 1 forwarded scanned copy of a letter from the mail id rflltd109@gmail.com dated 25/10/2018, regarding compliance officer name, phone number, corporate office address and name and addresses of the directors. Further, vide letter dated October 25, 2018 by SEBI, Noticee 1 was asked to provide the "*copies of the Minutes Book in respect of the proceedings of every meeting of Board of director of RFL international limited for the period relating to financial year 2009-10, 2010-11, 2011-2012 and 2012-13, as required to be maintained in terms of sec 193 of the Companies Act, 1956*". However, Noticee 1 failed to furnish requested information.

6.9. With regard to issue of share certificates dated April 21, 2011 by Noticee 1, SEBI sought clarification from Purva Share Registry Pvt. Ltd., the Registrar to Share transfer Agent of Noticee 1 (herein after referred to as '**RTA**') who informed SEBI vide (Annexure - VIII) letter dated 22/03/2019 that there was no change in total shareholding of RFL since 04/01/2010 and it was not aware of any preferential allotment of 80 lakhs shares by RFL.

6.10. SEBI also sought clarification from the depositories, National Securities Depository Limited (Herein after referred to as '**NSDL**') and Central Depositories Services Limited (Herein after referred to as '**CDSL**') in this regard. NSDL vide its mail dated 07/03/2019 replied that "*RFL International Limited (RFL) had*

not executed any corporate action for crediting additional issue of equity shares/further issue of equity shares during the period January 01, 2010 to March 2019. Further we wish to inform SEBI that RFL had consolidated its face value from Rs. 2 to Rs. 10 ... on January 5, 2010". CDSL vide its mail dated 13/03/2019 replied that paid-up capital of RFL was 5085500.

6.11. On perusal of their replies, SEBI observed that there was no further increase in the share capital of the RFL since January 2010. Vide e-mail dated 08/03/2019, both the NSDL and CDSL were asked to provide the provide all the Distinctive Numbers (i.e. physical Shares as well as dematerialized shares) of Noticee 1.In response to the same vide 11/03/2019, NSDL and CDSL submitted the details of the distinctive numbers (both Physical and dematerialized) of equity shares of RFL as maintained with them. From their reply, it was observed that the distinctive numbers of the share certificate issued by RFL on April 21, 2011 were not appearing in the list of distinctive numbers submitted by NSDL and CDSL.

6.12. Therefore, it was observed that Noticee 1 had not informed BSE about the issue of shares through share certificate dated April 21, 2011 and had not complied with provisions of listing conditions and delivered securities where no trading permission had been given by the recognized stock exchange, i.e., BSE. Therefore, it is alleged that Noticee 1 had not complied with clause 22, 24(a) and clause 30(b) of the listing agreement read with regulation 103 of the LODR Regulations.

7. Violation of PFUTP Regulations by the Noticees

7.1. Further, it was observed that there was no increase in the share capital in the books of Noticee 1 subsequent to the issue of the share certificates on April 21, 2011. It was also observed that Noticee 1 did not attempt to list those newly issued shares. In view of the foregoing, it is alleged that Noticee 1 had issued

share certificates dated April 21, 2011 to certain entities without any regulatory compliance and thereby, defrauded them.

7.2. Further, SEBI observed from the Annual report of RFL for the financial years 2010-11 and 2011-12 that Noticee 2 was the Chairman as well as the compliance officer of Noticee 1. SEBI also observed from the Know Your Client documents of Axis Bank Account No 003010200073130 of RFL that Noticee 2 was the authorized signatory and he was involved in the day-to-day transactions of RFL.

7.3. Therefore, it is alleged that Noticee 2, as the Managing director/Chairman/ compliance officer of Noticee 1, was responsible for issuance of share certificates RFL dated April 21, 2011 to certain entities without any regulatory compliance. In view of the above, it is alleged that Noticees 1 and 2 had violated Section 12A(a), (b), (c) of SEBI Act read with Regulation 3(a), (b), (c), (d) & 4(1) of PFUTP Regulations.

8. In view of the above,

8.1. Noticee 1 is therefore, called upon to show cause as to why an inquiry should not be held against him in terms of Rule 4 of SEBI Adjudication Rules read with Section 15I(1) & (2) of SEBI Act, and penalty be not imposed under Section 15A(a) of the SEBI Act for the alleged violation of Sections 11C(2) and 11C(3);

8.2. Noticee 1 is therefore, called upon to show cause as to why an inquiry should not be held against him in terms of Rule 4 of SCRA Adjudication Rules read with Section 23I of SCRA, and penalty be not imposed under Sections 23A(a), 23E and 23F of the SCRA for the alleged violation of clause 22, 24(a) and clause 30(b) of the listing agreement read with regulation 103 of the LODR Regulations.

8.3. Noticee 1 and 2 are therefore, called upon to show cause as to why an inquiry should not be held against him in terms of Rule 4 of SEBI Adjudication Rules read with Section 15I(1) & (2) of SEBI Act, and penalty be not imposed under Section 15HA of the SEBI Act for the alleged violation of Sections 12A(a), (b), (c) of SEBI Act read with Regulations 3(a), (b), (c), (d) and 4(1) of PFUTP Regulations;

9. Text of relevant provisions of Listing agreement, PFUTP Regulations, LODR Regulations, Sections of SEBI Act and SCRA are produced below for reference-

Relevant provisions of Listing Agreement:

Clause 22 of Listing Agreement
"The Company will, immediately after the meeting of its Board of Directors has been held to consider or decide the same, intimate to the Stock Exchanges where the Company is listed, (within 15 minutes of the closure of the board meeting) by phone, fax, telegram, email (cmlist@the Stock Exchange.co.in):

a. short particulars of any increase of capital whether by issue of bonus shares through capitalization, or by way of right shares to be offered to the shareholders or debenture holders, or in any other way;
b. short particulars of the reissues of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to ;
c. short particulars of any other alterations of capital, including calls;
d. any other information necessary to enable the holders of the listed securities of the Company to appraise its position and to avoid the establishment of a false market in such listed securities.

Clause 24(a) of the listing agreement
a. The Company agrees to disclose to the stock exchange in detail, regarding further issue of securities and to obtain "in-principle" approval for listing from the stock exchange where it is listed, before issuing such further shares or securities. The Company also agrees to make an application to the Stock Exchange for the listing of any new issue of shares or securities and of the provisional documents relating thereto.

Clause 30(b) of the listing agreement

"The Company shall display the following on its website and forward a copy of the following, to the Stock Exchange, promptly and without application:-
(a)-------
(b) all notices, resolutions and circulars relating to new issue of capital prior to their dispatch to the shareholders;"

Relevant provisions of LODR Regulation:

Repeal and Savings

103. *(1) On and from the commencement of these regulations, all circulars stipulating or modifying the provisions of the listing agreements including those specified in Schedule X, shall stand rescinded.*

(2) Notwithstanding such rescission, anything done or any action taken or purported to have been done or taken including any enquiry or investigation commenced or show cause notice issued in respect of the circulars specified in sub-regulation (1) or the Listing Agreements, entered into between stock exchange(s) and listed entity, in force prior to the commencement of these regulations, shall be deemed to have been done or taken under the corresponding provisions of these regulations.

Relevant provisions of PFUTP Regulation:

3. Prohibition of certain dealings in securities No person shall directly or indirectly—

(a) buy, sell or otherwise deal in securities in a fraudulent manner;
(b)use or employ, in connection with issue, purchase or sale of any security listed or proposed to be listed in a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of the Act or the rules or the regulations made there under;
(c)employ any device, scheme or artifice to defraud in connection with dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange;
(d)engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person in connection with any dealing in or issue of securities which are listed or proposed to be listed on a recognized stock exchange in contravention of the provisions of the Act or the rules and the regulations made there under.

4. Prohibition of manipulative, fraudulent and unfair trade practices
(1)Without prejudice to the provisions of regulation 3, no person shall indulge in a fraudulent or an unfair trade practice in securities.

Relevant provisions of SEBI Act:

11C. *(1).....*

(2) Without prejudice to the provisions of sections 235 to 241 of the Companies Act, 1956 (1 of 1956), it shall be the duty of every manager, managing director, officer and other employee of the company and every intermediary referred to in section 12 or every person associated with the securities market to preserve and to produce to the Investigating Authority or any person authorised by it in this behalf, all the books, registers, other documents and record of, or relating to, the company or, as the case may be, of or relating to, the intermediary or such person, which are in their custody or power.

(3) The Investigating Authority may require any intermediary or any person associated with securities market in any manner to furnish such information to, or produce such books, or registers, or other documents, or record before him or any person authorised by it in this behalf as it may consider necessary if the furnishing of such information or the production of such books, or registers, or other documents, or record is relevant or necessary for the purposes of its investigation.

12A. *No person shall directly or indirectly—*

(a) use or employ, in connection with the issue, purchase or sale of any securities listed or proposed to be listed on a recognized stock exchange, any manipulative or deceptive device or contrivance in contravention of the provisions of this Act or the rules or the regulations made thereunder;

(b) employ any device, scheme or artifice to defraud in connection with issue or dealing in securities which are listed or proposed to be listed on a recognised stock exchange;

(c) engage in any act, practice, course of business which operates or would operate as fraud or deceit upon any person, in connection with the issue, dealing in securities which are listed or proposed to be listed on a recognised stock exchange, in contravention of the provisions of this Act or the rules or the regulations made thereunder;

10. The aforesaid alleged violation, if established, makes the Noticees liable for monetary penalty under Section 15A(a) and 15HA of SEBI Act and Sections 23A(a), 23E and 23F of the SCRA. The provisions of which are reproduced hereunder.

Penalty for failure to furnish information, return, etc.

15A. *If any person, who is required under this Act or any rules or regulations made thereunder,—*

(a) to furnish any document, return or report to the Board, fails to furnish the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less

Penalty for fraudulent and unfair trade practices.

15HA. *If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty twenty-five crore rupees or three times the amount of profits made out of such failure, whichever is higher.*

Relevant provisions of SCRA:

Penalty for failure to furnish information, return, etc.

23A. *Any person, who is required under this Act or any rules made thereunder,—*
(a) to furnish any information, document, books, returns or report to a recognised stock exchange, fails to furnish the same within the time specified therefor in the listing agreement or conditions or bye-laws of the recognised stock exchange, shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less for each such failure;

Penalty for failure to comply with provision of listing conditions or delisting conditions or grounds.

23E. *If a company or any person managing collective investment scheme or mutual fund, fails to comply with the listing conditions or delisting conditions or grounds or commits a breach thereof, it or he shall be liable to a penalty not exceeding twenty-five crore rupees"*

Penalty for excess dematerialization or delivery of unlisted securities.

23F. *If any issuer dematerialises securities more than the issued securities of a company or delivers in the stock exchanges the securities which are not listed in the recognised stock exchange or delivers securities where no trading permission has been given by the recognised stock exchange, he shall be liable to a penalty not exceeding twenty-five crore rupees.*

11. Noticees shall submit the reply to the Show Cause Notice supported by such documentary evidence, which they may like to adduce in support of the reply within 15 days from the date of receipt of this notice by them, failing which the

matter shall be proceeded on the basis of the material/ facts available on record. Further, a soft copy of the reply may also be sent via email at somam@sebi.gov.in and manishg@sebi.gov.in. In case no reply is received from Noticees within the prescribed time mentioned above, it would be presumed that Noticees have no submissions to make and the matter shall be proceeded with on the basis of material/facts on record. A copy of PAN Card, contact details (contact person, phone number, email details, fax etc.) of the Noticees may also be submitted along with the reply.

12. The Noticees may also note that a settlement mechanism is provided under the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018. If the Noticees wish to avail the benefit of the settlement process, then they may apply for the same in the manner provided in the said regulations under intimation to the undersigned.

13. Further, Noticees may note that if there is any change in addresses of Noticees during the period of the current Adjudication proceedings, they are required to inform the same to the Adjudicating Officer, immediately.

S Majumder

Soma Majumder
Adjudicating Officer

SOMA MAJUMDER

Digitally signed by SOMA MAJUMDER
Date: 2021.08.06 12:25:35 +05'30'

Annexure I – Copy of Appointment order

Annexure II – Copy of the summon dated January 04, 2019 and reminders along with acknowledge slip

Annexure III – Copies of email dated October 25, 2018, from the Noticee 1

Annexure IV – Copy of the summon dated April 01, 2019 and reminders along with acknowledge slip

Annexure V – Copies of SEBI letters to entities and their replies

Annexure VI – Copies of emails from BSE dated 10/08/2017 and 31/08/2017

Annexures VII – Copy of List of 49 allottees for the preferential allotment

Annexures VIII – Copy of reply of RTA dated March 25, 2019

Annexures IX – Copy of reply of NSDL and CDSL

Annexures X – Copy of the Annual report of RFL for the year 2010-11 and 2011-12.