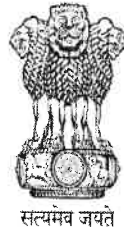


Form No. MGT-7**Annual Return (other than OPCs and Small Companies)**

[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)

U24240GJ1980PLC003670

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	NIRMA LIMITED	NIRMA LIMITED
Registered office address	NIRMA HOUSE ASHRAM ROAD,NA,AHMEDABAD,Ahmedabad,Gujarat,India,380009	NIRMA HOUSE ASHRAM ROAD,NA,AHMEDABAD,Ahmedabad,Gujarat,India,380009
Latitude details	23.039024	23.039024
Longitude details	72.56931	72.56931

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

NirmaPhotograph.pdf

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

AA*****OK

(c) *e-mail ID of the company

*****irma@nirma.co.in

(d) *Telephone number with STD code

07*****00

(e) Website	www.nirma.co.in								
iv *Date of Incorporation (DD/MM/YYYY)	25/02/1980								
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									
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">S. No.</th> <th style="width: 55%;">Stock Exchange Name</th> <th style="width: 30%;">Code</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>		S. No.	Stock Exchange Name	Code					
S. No.	Stock Exchange Name	Code							
viii Number of Registrar and Transfer Agent	1								
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">CIN of the Registrar and Transfer Agent</th> <th style="width: 25%;">Name of the Registrar and Transfer Agent</th> <th style="width: 25%;">Registered office address of the Registrar and Transfer Agents</th> <th style="width: 25%;">SEBI registration number of Registrar and Transfer Agent</th> </tr> </thead> <tbody> <tr> <td>U67190MH1999PTC118368</td> <td>MUFG INTIME INDIA PRIVATE LIMITED</td> <td>C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,Mumbai,Mumbai City,Maharashtra,India,400083</td> <td>INR000004058</td> </tr> </tbody> </table>		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	U67190MH1999PTC118368	MUFG INTIME INDIA PRIVATE LIMITED	C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,Mumbai,Mumbai City,Maharashtra,India,400083	INR000004058
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						
U67190MH1999PTC118368	MUFG INTIME INDIA PRIVATE LIMITED	C-101, 1st Floor, 247 Park, Lal Bahadur Shastri Marg, Vikhroli (West,),,Mumbai,Mumbai City,Maharashtra,India,400083	INR000004058						
ix * (a) Whether Annual General Meeting (AGM) held									
☐ Yes ☒ No									
(b) If yes, date of AGM (DD/MM/YYYY)									
(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

AGM will be held before Due Date

II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i *Number of business activities

2

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	20	Manufacture of chemicals and chemical products	70.67
2	C	Manufacturing	32	Other manufacturing	11.19

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

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

6

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Jo int Venture	% of shares held
1		NotApplicable1	KARNAVATI HOLDINGS INC., USA	Subsidiary	100
2		NotApplicable2	SEARLES VALLEY MINERALS INC., USA	Subsidiary	100
3		NotApplicable3	SEARLES VALLEY MINERALS EUROPE , FRANCE	Subsidiary	100
4		NotApplicable4	SEARLES DOMESTIC WATER COMPANY LLC, USA	Subsidiary	100
5		NotApplicable5	TRONA RAILWAY COMPANY LLC, USA	Subsidiary	100

6	L74900PN2011PLC139963		ALIVUS LIFE SCIENCES LIMITED	Subsidiary	74.87
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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	1461000000.00	146075130.00	146075130.00	146075130.00
Total amount of equity shares (in rupees)	7305000000.00	730375650.00	730375650.00	730375650.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Equity shares				
Number of equity shares	1461000000	146075130	146075130	146075130
Nominal value per share (in rupees)	5	5	5	5
Total amount of equity shares (in rupees)	7305000000.00	730375650.00	730375650.00	730375650.00

(b) Preference share capital

Particulars	Authorised Capital	Issued capital	Subscribed capital	Paid Up capital
Total number of preference shares	4500000.00	0.00	0.00	0.00
Total amount of preference shares (in rupees)	450000000.00	0.00	0.00	0.00

Number of classes

1

Class of shares	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Preference shares				
Number of preference shares	4500000.00	0	0	0
Nominal value per share (in rupees)	100	100	100	100
Total amount of preference shares (in rupees)	450000000.00	0.00	0	0

(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	0	146075130	146075130.00	730375650	730375650	
Increase during the year	0.00	0.00	0.00	0.00	0.00	0
i Public Issues	0	0	0.00	0	0	
ii Rights issue	0	0	0.00	0	0	
iii Bonus issue	0	0	0.00	0	0	
iv Private Placement/ Preferential allotment	0	0	0.00	0	0	
v ESOPs	0	0	0.00	0	0	
vi Sweat equity shares allotted	0	0	0.00	0	0	
vii Conversion of Preference share	0	0	0.00	0	0	
viii Conversion of Debentures	0	0	0.00	0	0	
ix GDRs/ADRs	0	0	0.00	0	0	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
x Others, specify 0	0	0	0.00	0	0	
Decrease during the year	0.00	0.00	0.00	0.00	0.00	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 0	0	0	0.00	0	0	
At the end of the year	0.00	146075130.00	146075130.00	730375650.00	730375650.00	
(ii) Preference shares						
At the beginning of the year	0	0	0.00	0	0	
Increase during the year	0.00	0.00	0.00	0.00	0.00	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

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

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

Classes of non-convertible debentures	Number of units	Nominal value per unit	Total value (Outstanding at the end of the year)
Secured Listed Non Convertible Debenture SeriesVII	1380	100000	138000000.00
Total	1380.00	100000.00	138000000.00

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
Secured Listed Non Convertible Debenture SeriesVII	23857760136	0	10060628202	13797131934.00
Total	23857760136.00	0.00	10060628202.00	13797131934.00

(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	23857760136.00	0.00	10060628202.00	13797131934.00
Partly convertible debentures	0.00	0.00	0.00	0.00
Fully convertible debentures	0.00	0.00	0.00	0.00
Total	23857760136.00	0.00	10060628202.00	13797131934.00

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

70922680266

ii * Net worth of the Company

61783054673

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	146075130	100.00	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00

	(iii) Foreign national (other than NRI)	0	0.00	0	0.00
2	Government				
	(i) Central Government	0	0.00	0	0.00
	(ii) State Government	0	0.00	0	0.00
	(iii) Government companies	0	0.00	0	0.00
3	Insurance companies	0	0.00	0	0.00
4	Banks	0	0.00	0	0.00
5	Financial institutions	0	0.00	0	0.00
6	Foreign institutional investors	0	0.00	0	0.00
7	Mutual funds	0	0.00	0	0.00
8	Venture capital	0	0.00	0	0.00
9	Body corporate (not mentioned above)	0	0.00	0	0.00
10	Others 	0	0.00	0	0.00
	Total	146075130.00	100	0.00	0

Total number of shareholders (promoters)

7

B Public/Other than promoters

S. No	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1	Individual/Hindu Undivided Family				
	(i) Indian	0	0.00	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00

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

Total number of shareholders (other than promoters)

0

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

7.00

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

Sl.No	Category	
1	Individual - Female	3
2	Individual - Male	4
3	Individual - Transgender	0
4	Other than individuals	0
	Total	7.00

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

Name of the FII	Address	Date of Incorporation	Country of Incorporation	Number of shares held	% of shares held

VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS

[Details of Promoters, Members (other than promoters), Debenture holders]

Details	At the beginning of the year	At the end of the year
Promoters	7	7
Members (other than promoters)	0	0
Debenture holders	37	28

VIII DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL
A Composition of Board of Directors

Category	Number of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A Promoter	1	2	1	2	19.95	78.61
B Non-Promoter	1	6	1	4	0.00	0.00
i Non-Independent	1	1	1	0	0	0
ii Independent	0	5	0	4	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	2	8	2	6	19.95	78.61

*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 shares held	Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)
KARSANBHAI KHODIDAS PATEL	00404099	Director	86152936	
RAKESHBHAI KARSANBHAI PATEL	00760023	Director	28668905	
KAUSHIKBHAI NANDUBHAI PATEL	00145086	Director	0	
TEJALBEN AMITKUMAR MEHTA	10125072	Director	0	
HIREN KARSANBHAI PATEL	00145149	Managing Director	29145609	
ASHISH DESAI	00962502	Whole-time director	0	
KHODABHAI KALIDAS PATEL	00403392	Director	0	
SANJIV NARAYANBHAI PATEL	02794095	Director	0	
MANAN NUTANBHAI SHAH	ALLPS2780H	CFO	0	
PARESH BALMUKUND SHETH	AEAPS2375C	Company Secretary	0	

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

2

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)
PANKAJ RAMANBHAI PATEL	00131852	Director	14/08/2025	Cessation
SATISH CHANDRAKANT SHAH	00385356	Director	17/05/2025	Cessation

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

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

*Number of meetings held

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	14/08/2025	7	7	100

B BOARD MEETINGS

*Number of meetings held

4

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	29/05/2025	9	8	88.89
2	07/08/2025	9	7	77.78
3	17/10/2025	8	7	87.5
4	11/02/2026	8	8	100

C COMMITTEE MEETINGS

Number of meetings held

18

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	05/05/2025	4	2	50
2	AUDIT COMMITTEE	29/05/2025	3	3	100
3	AUDIT COMMITTEE	07/08/2025	3	3	100
4	AUDIT COMMITTEE	10/10/2025	3	3	100

5	AUDIT COMMITTEE	17/10/2025	3	2	66.67
6	AUDIT COMMITTEE	29/12/2025	3	3	100
7	AUDIT COMMITTEE	11/02/2026	3	3	100
8	CORPORATE SOCIAL RESPONSIBILITY COMMITTEE	29/05/2025	3	3	100
9	CORPORATE SOCIAL RESPONSIBILITY COMMITTEE	11/02/2026	3	3	100
10	NOMINATION AND REMUNERATION COMMITTEE	29/05/2025	3	3	100
11	NOMINATION AND REMUNERATION COMMITTEE	07/08/2025	3	3	100
12	NOMINATION AND REMUNERATION COMMITTEE	11/02/2026	3	3	100
13	INVESTMENT COMMITTEE	29/09/2025	4	3	75
14	INVESTMENT COMMITTEE	03/12/2025	4	4	100
15	INVESTMENT COMMITTEE	29/12/2025	4	4	100
16	INVESTMENT COMMITTEE	12/01/2026	4	3	75
17	INVESTMENT COMMITTEE	06/03/2026	4	4	100
18	INVESTMENT COMMITTEE	30/03/2026	4	4	100

D ATTENDANCE OF DIRECTORS

S. No	Name of the Director	Board Meetings			Committee Meetings			Whether attended AGM held on (Y/N/NA)
		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	
1	TEJALBEN AMITKUMAR MEHTA	4	4	100	10	10	100	
2	KARSANBHAI KHODIDAS PATEL	4	4	100	2	2	100	

3	RAKESHBHAI KARSANBHAI PATEL	4	4	100	9	9	100	
4	KAUSHIKBHAI NANDUBHAI PATEL	4	3	75	18	16	88	
5	SANJIV NARAYANBHAI PATEL	4	4	100	0	0	0	
6	HIREN KARSANBHAI PATEL	4	4	100	8	8	100	
7	ASHISH DESAI	4	4	100	13	11	84	
8	KHODABHAI KALIDAS PATEL	4	3	75	0	0	0	

X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil

A *Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	HIREN KARSANBHAI PATEL	Managing Director	45646477	0	0	3738133	49384610.00
2	ASHISH DESAI	Whole-time director	7772820	0	0	1393759	9166579.00
	Total		53419297.00	0.00	0.00	5131892.00	58551189.00

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

2

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	MANAN NUTANBHAI SHAH	CFO	7965102	0	0	1711550	9676652.00
2	PARESH BALMUKUND SHETH	Company Secretary	8481244	0	0	1247784	9729028.00
	Total		16446346.00	0.00	0.00	2959334.00	19405680.00

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

7

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
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1	KARSANBHAI KHODIDAS PATEL	Director	200000	0	0	175560	375560.00
2	RAKESHBHAI KARSANBHAI PATEL	Director	230000	0	0	133066	363066.00
3	PANKAJ RAMANBHAI PATEL	Director	50000	0	0	0	50000.00
4	KAUSHIKBHAI NANDUBHAI PATEL	Director	240000	0	0	0	240000.00
5	TEJALBEN AMITKUMAR MEHTA	Director	300000	0	0	0	300000.00
6	KHODABHAI K. PATEL	Director	150000	0	0	0	150000.00
7	SANJIV NARAYANBHAI PATEL	Director	200000	0	0	0	200000.00
	Total		1370000.00	0.00	0.00	308626.00	1678626.00

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

35

XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or
Debenture holder.xlsm

(b) Optional Attachment(s), if any

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 **NIRMA LIMITED** as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) **31/03/2026**

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

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

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

1 its status under the Act;

2 maintenance of registers/records & making entries therein within the time prescribed therefor;

- 3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/beyond the prescribed time;
- 4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
- 5 closure of Register of Members / Security holders, as the case may be.
- 6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
- 7 contracts/arrangements with related parties as specified in section 188 of the Act;
- 8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
- 9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act
- 10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
- 11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;
- 12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
- 13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
- 14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
- 15 acceptance/ renewal/ repayment of deposits;
- 16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;
- 17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act ;
- 18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

KASHYAP R. MEHTA

Date (DD/MM/YYYY)

16/09/2026

Place

AHMEDABAD

Whether associate or fellow:

☐ Associate ☒ Fellow

Certificate of practice number

2*5*

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

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

00962502

* (b) Name of the Designated Person

ASHISH DESAI

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 22 dated* (DD/MM/YYYY) 13/06/2015 to sign this form and declare that all the requirements of Companies Act, 2013

and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

- 1 Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.
- 2 All the required attachments have been completely and legibly attached to this form.

*To be digitally signed by

*Designation

(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))

Director

*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator

0*9*2*0*

*To be digitally signed by

☒ Company Secretary ☐ Company secretary in practice

*Whether associate or fellow:

☐ Associate ☒ Fellow

Membership number

2*2*

Certificate of practice number

Note: Attention is drawn to provisions of Section 448 and 449 of the Companies Act, 2013 which provide for punishment for false statement / certificate and punishment for false evidence respectively.

For office use only:

eForm Service request number (SRN)

AC6138837

eForm filing date (DD/MM/YYYY)

23/09/2026

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

Sr. No.	Type of shareholder/debenture holder	Category of shareholder	Details of shareholder/debenture holder	Name of shareholder/debenture holder	Type of security held	Class of security held	Folio Number / Reference Number	DP ID-Client Id-Account Number	Nationality of incorporation	Gender	Type of Identifier	Occupation	Number of security held	Nominal value per security	Total amount of securities held (in INR)
1	Individual	Promoter	Not applicable	Karsanbhai Khodidas Patel	Equity	Equity	INE091A01037	IN30429550 926304	India	Male	Income Tax PAN	Business	86,152,936	5	430764680.00
2	Individual	Promoter	Not applicable	Rakesh Karsanbhai Patel	Equity	Equity	INE091A01037	IN30132110 713232	India	Male	Income Tax PAN	Business	28,668,905	5	143344525.00
3	Individual	Promoter	Not applicable	Hiren Karsanbhai Patel	Equity	Equity	INE091A01037	IN30132110 713249	India	Male	Income Tax PAN	Business	29,145,609	5	145728045.00
4	Individual	Promoter	Not applicable	Shantaben Karsanbhai Patel	Equity	Equity	INE091A01037	IN30132110 713265	India	Female	Income Tax PAN	Business	100	5	500.00
5	Individual	Promoter	Not applicable	Rajalben H Patel jointly with Hirenbhai K. Patel	Equity	Equity	INE091A01037	IN30132110 335702	India	Female	Income Tax PAN	Housewife	964,280	5	4821400.00
6	Individual	Promoter	Not applicable	Keyurben Rakeshbhai Patel jointly with Rakeshbhai Karsanbhai Patel	Equity	Equity	INE091A01037	IN30132110 679911	India	Female	Income Tax PAN	Housewife	1,143,200	5	5716000.00
7	Individual	Promoter	Not applicable	Dhruvil H Patel	Equity	Equity	INE091A01037	IN30132110 741127	India	Male	Income Tax PAN	Student	100	5	500.00
8	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL RETIREMENT FUND-PURE DEBT PLAN	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30005410 101354	India	Not applicable	Other registration number	Mutual Fund	600	100000	60000000
9	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL RETIREMENT FUND-HYBRID CONSERVATIVE PLAN	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30005410 101362	India	Not applicable	Other registration number	Mutual Fund	350	100000	35000000
10	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL RETIREMENT FUND-HYBRID AGGRESSIVE PLAN	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30005410 101379	India	Not applicable	Other registration number	Mutual Fund	350	100000	35000000
11	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL ALL SEASONS BOND FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30012611 218195	India	Not applicable	Other registration number	Mutual Fund	20000	100000	2000000000
12	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL SAVINGS FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30012611 218234	India	Not applicable	Other registration number	Mutual Fund	7500	100000	750000000
13	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL SHORT TERM FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30012611 218522	India	Not applicable	Other registration number	Mutual Fund	12500	100000	1250000000
14	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL ULTRA SHORT TERM FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30012611 240155	India	Not applicable	Other registration number	Mutual Fund	12100	100000	1210000000

15	Entity	Other than promoter	Mutual funds	HSBC MUTUAL FUND - HSBC CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30012611	India	Not applicable	Other registration number	Mutual Fund	2500	100000	250000000
16	Entity	Other than promoter	Mutual funds	NIPPON LIFE INDIA TRUSTEE LTD-A/C NIPPON INDIA BALANCED ADVANTAGE FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	1500	100000	150000000
17	Entity	Other than promoter	Mutual funds	KOTAK CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	500	100000	50000000
18	Entity	Other than promoter	Mutual funds	AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS STRATEGIC BOND FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	5000	100000	500000000
19	Entity	Other than promoter	Mutual funds	NIPPON LIFE INDIA TRUSTEE LTD-A/C NIPPON INDIA ULTRA SHORT DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	17600	100000	1760000000
20	Entity	Other than promoter	Mutual funds	KOTAK MAHINDRA TRUSTEE CO. LTD. A/C KOTAK LOW DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	1000	100000	100000000
21	Entity	Other than promoter	Mutual funds	NPS TRUST A/C - AXIS PENSION FUND MANAGEMENT LIMITED SCHEME C - TIER I	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	1500	100000	150000000
22	Entity	Other than promoter	Mutual funds	BARODA BNP PARIBAS CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30016710	India	Not applicable	Other registration number	Mutual Fund	1000	100000	100000000
23	Entity	Other than promoter	Mutual funds	UTI ULTRA SHORT DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30048430	India	Not applicable	Other registration number	Mutual Fund	2500	100000	250000000
24	Entity	Other than promoter	Mutual funds	HDFC MUTUAL FUND-HDFC CREDIT RISK DEBT FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30134820	India	Not applicable	Other registration number	Mutual Fund	17500	100000	1750000000
25	Entity	Other than promoter	Mutual funds	HDFC MUTUAL FUND-HDFC FLOATING RATE DEBT FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30134820	India	Not applicable	Other registration number	Mutual Fund	1000	100000	100000000
26	Entity	Other than promoter	Mutual funds	ICICI PRUDENTIAL CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07208	IN30378610	India	Not applicable	Other registration number	Mutual Fund	15000	100000	1500000000
27	Entity	Other than promoter	Mutual funds	DSP CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07216	IN30005410	India	Not applicable	Other registration number	Mutual Fund	1500	100000	150000000
28	Entity	Other than promoter	Mutual funds	HSBC MUTUAL FUND - HSBC CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07216	IN30012611	India	Not applicable	Other registration number	Mutual Fund	500	100000	500000000
29	Entity	Other than promoter	Mutual funds	NIPPON LIFE INDIA TRUSTEE LTD-A/C NIPPON INDIA ULTRA SHORT DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07216	IN30016710	India	Not applicable	Other registration number	Mutual Fund	10000	100000	1000000000
30	Entity	Other than promoter	Mutual funds	BANK OF INDIA CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr VII TrB	INE091A07216	IN30016710	India	Not applicable	Other registration number	Mutual Fund	1000	100000	1000000000

31	Entity	Other than promoter	Mutual funds	AXIS MUTUAL FUND TRUSTEE LIMITED A/C AXIS MUTUAL FUND A/C AXIS ULTRA SHORT DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr. VII TrB	INE091A07216	IN30016710151409	India	Not applicable	Other registration number	Mutual Fund	1000	100000	1000000000
32	Entity	Other than promoter	Mutual funds	BARODA BNP PARIBAS CONSERVATIVE HYBRID FUND	Debentures	Secured listed Nonconvertible Debenture Sr. VII TrB	INE091A07216	IN30016710180810	India	Not applicable	Other registration number	Mutual Fund	90	100000	90000000
33	Entity	Other than promoter	Mutual funds	BARODA BNP PARIBAS CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr. VII TrB	INE091A07216	IN30016710181031	India	Not applicable	Other registration number	Mutual Fund	410	100000	410000000
34	Entity	Other than promoter	Mutual funds	UTI ULTRA SHORT DURATION FUND	Debentures	Secured listed Nonconvertible Debenture Sr. VII TrB	INE091A07216	IN30048430489972	India	Not applicable	Other registration number	Mutual Fund	2500	100000	2500000000
35	Entity	Other than promoter	Mutual funds	UTI-CREDIT RISK FUND	Debentures	Secured listed Nonconvertible Debenture Sr. VII TrB	INE091A07216	IN30048430490155	India	Not applicable	Other registration number	Mutual Fund	1000	100000	1000000000