Form No. MGT-7

Form language

(●) English ( ) Hindi

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]

*All fields marked in * are mandatory*

Refer instruction kit for filing the form

I REGISTRATION AND OTHER DETAILS

i *Corporate Identity Number (CIN): L74900DL1984PLC018679

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	PAUL MERCHANTS LIMITED	PAUL MERCHANTS LIMITED
Registered office address	DSM 335,336,337, 3rd Floor, DLF Tower, 15, Shivaji Marg, Najafgarh Road,NA,New Delhi,New Delhi,Delhi,India,110015	DSM 335,336,337, 3rd Floor, DLF Tower, 15, Shivaji Marg, Najafgarh Road,NA,New Delhi,New Delhi,Delhi,India,110015
Latitude details	28.66314	28.66314
Longitude details	77.15311	77.15311

(a) *Photograph of the registered office of the Company showing external building and name prominently visible: 666246755_594549666_558456221_Registered office Photo 1).pdf

(b) *Permanent Account Number (PAN) of the company: AA******9D

(c) *e-mail ID of the company: *****H.VAID@PAULMERCHANTS.NET

(d) *Telephone number with STD code: 01*******60

(e) Website | www.paulmerchants.net

iv *Date of Incorporation (DD/MM/YYYY) | 13/07/1984

v (a) *Class of Company (as on the financial year end date) | Public company

(Private company/Public Company/One Person Company)

(b) *Category of the Company (as on the financial year end date) | Company limited by shares

(Company limited by shares/Company limited by guarantee/Unlimited company)

(c) *Sub-category of the Company (as on the financial year end date) | Indian Non-Government company

(Indian Non-Government company/Union Government Company/State Government Company/ Guarantee and association company/Subsidiary of Foreign 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**
1	Bombay Stock Exchange (BSE)	A1 - Bombay Stock Exchange (BSE)

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**
U74210DL1991PLC042569	ALANKIT ASSIGNMENTS LIMITED	205-208ANARKALI COMPLEX JHANDEWALAN EXTENSION, NEW DELHI,Delhi,India,110055	INR000002532

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

The AGM shall be held in September 2026, and this form is being generated for the purpose of compliance under Section 134(3)(a)

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	K	Financial and insurance activities	66	Other financial activities	99.73
2	N	Administrative and support service activities	79	Travel agency, tour operator and other reservation service activities	0.27

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

i *No. of Companies for which information is to be given | 3

S. No.	CIN /FCRN	Other registration number	Name of the company	Holding/ Subsidiary/Associate/Joint Venture	% of shares held
1	U65921CH2010PTC032462		PAUL MERCHANTS FINANCE PRIVATE LIMITED	Subsidiary	100
2	U70109CH2017PTC041807		PAUL MERCHANTS REALTORS PRIVATE LIMITED	Subsidiary	100
3	U62099CH2024PTC045496		PAUL INFOTECH PRIVATE LIMITED	Subsidiary	100

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	10500000.00	3084000.00	3084000.00	3084000.00
Total amount of equity shares (in rupees)	105000000.00	30840000.00	30840000.00	30840000.00

Number of classes: 1

Class of shares Equity	Authorised Capital	Issued capital	Subscribed Capital	Paid Up capital
Number of equity shares	10500000	3084000	3084000	3084000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	105000000	30840000	30840000	30840000

(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	0	3084000	3084000.00	30840000	30840000	
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	
x Others, specify NA	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	

Particulars	Number of shares			Total Nominal Amount	Total Paid-up amount	Total premium
iv Others, specify NA	0	0	0.00		0	
At the end of the year	0.00	3084000.00	3084000.00	30840000.00	30840000.00	
(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 NA	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 NA	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) 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: 2

Attachments:

1. Details of shares/Debentures Transfers: Transfer Details.xlsm.xlsm

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 — 20559099489

ii * Net worth of the Company — 4952246064

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	1995279	64.70	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)	307065	9.96	0	0.00
10	Others	0	0.00	0	0.00
	Total	2302344.00	74.66	0.00	0

Total number of shareholders (promoters) | 4

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	733635	23.79	0	0.00
	(ii) Non-resident Indian (NRI)	0	0.00	0	0.00
	(iii) Foreign national (other than NRI)	5702	0.18	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)	17764	0.58	0	0.00
10	Others HUF AND LLP	24555	0.80	0	0.00
	Total	781656.00	25.35	0.00	0

Total number of shareholders (other than promoters): 4251

Total number of shareholders (Promoters + Public/Other than promoters): 4255.00

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

Sl.No	**Category**	
1	Individual - Female	2024
2	Individual - Male	2025
3	Individual - Transgender	1
4	Other than individuals	205
	Total	4255.00

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	4	4
Members (other than promoters)	4453	4251
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	1	2	1	2	28.62	36.08
B Non-Promoter	1	4	1	4	0.00	0.00
i Non-Independent	1	0	1	0	0	0
ii Independent	0	4	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	6	2	6	28.62	36.08

*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date: 10

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

Name	**DIN/PAN**	**Designation**	**Number of equity shares held**	**Date of cessation (after closure of financial year : If any) (DD/MM/YYYY)**

RAJNEESH BANSAL	00077230	Managing Director	882759	
SAT PAUL BANSAL	00077499	Director	556260	
SARITA RANI BANSAL	00094504	Director	556260	
RITESH VAID	09433856	Whole-time director	0	
INDER SAIN NEGI	08947230	Director	0	
ANOOP KUMAR SHARMA	02296633	Director	0	
BHUPINDER SINGH	02152722	Director	0	
TEJINDER KAUR	00512377	Director	0	
. SAKSHI	EQFPS7178A	CFO	0	
HARDAM SINGH	APYPS4687Q	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)
RAJNEESH BANSAL	00077230	Managing Director	01/04/2025	Appointment
INDER SAIN NEGI	08947230	Director	01/11/2025	Appointment

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	19/09/2025	4501	69	0.78

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	26/05/2025	8	8	100
2	13/08/2025	8	8	100
3	12/11/2025	8	7	87.5
4	12/02/2026	8	7	87.5

C COMMITTEE MEETINGS

Number of meetings held

28

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 Commiittee Meeting	26/05/2025	3	3	100
2	Audit Commiittee Meeting	12/08/2025	3	3	100
3	Audit Commiittee Meeting	11/11/2025	3	3	100
4	Audit Commiittee Meeting	11/02/2026	3	3	100
5	Nomination & Remuneration Committee	25/04/2025	3	2	66.67
6	Nomination & Remuneration Committee	25/07/2025	3	3	100
7	Nomination & Remuneration Committee	22/10/2025	3	3	100
8	Nomination & Remuneration Committee	19/01/2026	3	3	100

9	Stakeholders Relationship Committee	25/04/2025	3	3	100
10	Stakeholders Relationship Committee	25/07/2025	3	3	100
11	Stakeholders Relationship Committee	22/10/2025	3	3	100
12	Stakeholders Relationship Committee	19/01/2026	3	3	100
13	Corporate Social Responsiblity Committee	25/04/2025	3	3	100
14	Corporate Social Responsiblity Committee	25/07/2025	3	3	100
15	Corporate Social Responsiblity Committee	22/10/2025	3	3	100
16	Corporate Social Responsiblity Committee	19/01/2026	3	3	100
17	Executive Committee	17/05/2025	3	3	100
18	Executive Committee	03/06/2025	3	3	100
19	Executive Committee	13/06/2025	3	3	100
20	Executive Committee	21/06/2025	3	3	100
21	Executive Committee	18/07/2025	3	3	100
22	Executive Committee	12/08/2025	3	3	100
23	Executive Committee	03/09/2025	3	3	100
24	Executive Committee	22/10/2025	3	3	100
25	Executive Committee	14/11/2025	3	3	100
26	Executive Committee	24/11/2025	3	3	100
27	Executive Committee	09/01/2026	3	3	100
28	Executive Committee	17/02/2026	3	3	100

D ATTENDANCE OF DIRECTORS

S. No	**Name of the Director**	**Board Meetings**			**Committee Meetings**			**Whether attended AGM held on**
		Number of Meetings which director was entitled to attend	**Number of Meetings attended**	**% of attendance**	**Number of Meetings which director was entitled to attend**	**Number of Meetings attended**	**% of attendance**	(Y/N/NA)

1	RAJNEESH BANSAL	4	4	100	20	20	100	
2	SAT PAUL BANSAL	4	4	100	20	20	100	
3	SARITA RANI BANSAL	4	4	100	0	0	0	
4	RITESH VAID	4	3	75	12	12	100	
5	INDER SAIN NEGI	4	4	100	8	7	87	
6	ANOOP KUMAR SHARMA	4	4	100	12	12	100	
7	BHUPINDER SINGH	4	4	100	12	12	100	
8	TEJINDER KAUR	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	Rajneesh Bansal	Managing Director	36000000	0	0	0	36000000.00
2	Ritesh Vaid	Whole-time director	2856108	0	0	311004	3167112.00
	Total		38856108.00	0.00	0.00	311004.00	39167112.00

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	Hardam Singh	Company Secretary	2839758	0	0	638974	3478732.00
2	Sakshi	CFO	2582088	0	0	122345	2704433.00
	Total		5421846.00	0.00	0.00	761319.00	6183165.00

C *Number of other directors whose remuneration details to be entered: 4

S. No.	Name	Designation	Gross salary	Commission	Stock Option/ Sweat equity	Others	Total amount
1	Inder Sain Negi	Director	0	0	0	75000	75000.00
2	Anop Kumar Sharma	Director	0	0	0	125000	125000.00
3	Bhupinder Singh	Director	0	0	0	125000	125000.00
4	Tejinder Kaur	Director	0	0	0	100000	100000.00
	Total		0.00	0.00	0.00	425000.00	425000.00

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 1

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
Paul Merchants Limited	Directorate of Enforcement, New Delhi	06/10/2025	Foreign Exchange Management Act, 1999	Cautionary penalty of Rs. 5,00,000/- (Rupees Five Lakh Only) imposed for contravention of Section 10(5), FEMA, 1999 read with RBI Master Direction on KYC dated 25.02.2016	Order dated 06.10.2025 is final

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: 4255

XIV Attachments

(a) List of share holders, debenture holders: Details of Shareholder or Debenture holder (2).xlsm

(b) Optional Attachment(s), if any: Clarification Letter.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 PAUL MERCHANTS 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: Kanwaljit Singh Thanewal

Date (DD/MM/YYYY): 05/08/2026

Place: Chandigarh

Whether associate or fellow:

○ Associate ● Fellow

Certificate of practice number: 5*7*

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

*(a) DIN/PAN/Membership number of Designated Person	APYPS4687Q
*(b) Name of the Designated Person	HARDAM SINGH

Declaration

I am authorised by the Board of Directors of the Company vide resolution number* 20 dated* (DD/MM/YYYY) 27/05/2026 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**

*Designation: Director

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

*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator: 0*0*7*3*

***To be digitally signed by**

○ Company Secretary ◉ Company secretary in practice

*Whether associate or fellow:

○ Associate ◉ Fellow

Membership number:

Certificate of practice number: 5*7*

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)	AC5165436
eForm filing date (DD/MM/YYYY)	06/08/2026

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


शुभ दीपावली
शुभ
दीपावली
PAUL MERCHANTS
Push
CORPORATE OFFICE
PAUL MERCHANTS LTD. PML HOUSE, SCO- 829-830,
SECTOR- 22-A, CHANDIGARH - 160022
PHONE:- 0172-5041757, 5041740,5041792
REGISTERED OFFICE
PAUL MERCHANTS LTD. DSM 335, 336, 337, 3RD
FLOOR, DLF TOWER, 15, SHIVAJI MARG,
NAJAFGARH ROAD, NEW DELHI - 110015
PHONE:- 011-48702000
PAUL MERCHANTS
GSTIN: 07AAACP5609D1ZQ
CIN: L74900DL1984PLC018679

Share Transfer Details

Date of Register/Transfer	Type of Transfer	No. of Shares	Transferor Name	Transferee Name
15-09-2025	Equity share	4,80,540	Sarita Rani Bansal	Sat Paul Bansal
18-03-2026	Equity share	3,07,065	Paul Excursions Private Limited	Paul Excursions LLP

PAUL MERCHANTS

Paul Merchants Limited
An ISO 9001 : 2015 Certified Company CIN : L74900DL1984PLC018679
Corp. Office. : PML House, SCO 829-830, Sector 22-A, Chandigarh-160022
Ph. 0172-5041740, 5041757, 5041792 Fax : 0172-5041713
Regd. Office : DSM 335, 336, 337, 3rd Floor, DLF Tower, 15, Shivaji Marg,
Najafgarh Road, New Delhi-110015 Ph. : 011-47529460
www.paulmerchants.net info@paulmerchants.net

Date: August 5, 2026

To
The Registrar of Companies
National Capital Territory of Delhi & Haryana
4th Floor, IFCI Tower,
61, Nehru Place,
New Delhi – 110019

Subject: Clarification regarding certain data fields in Form MGT-7

Sir/Madam,

This is to submit that while preparing and filing Form MGT-7 for FY 2025-26, we have noted that the Company is to submit the breakup of Male, Female, and Transgender shareholder's in **point VI.(b)** under the heading "Breakup of total number of shareholders (Promoters + Other than promoters)". Please note that this breakup is not available in the Shareholding details provided by our RTA and as per our RTA, the complete details are not even available in the data downloaded by them from NSDL. Only to complete the mandatory fields for individuals, one shareholder was shown under "Transgender" and the remaining were divided equally under "Male" and "Female." However, the details relating to "Other than Individual" have been correctly reported in the form.
Further, under point 8(B)(ii), since the Nature of Change dropdown does not provide an option for Re-appointment, the option Appointment was selected for the re-appointment of Mr. Rajneesh Bansal (DIN 00077230) as Managing Director w.e.f. 01/04/2025 and Mr. Inder Sain Negi (DIN 08947230) as Director w.e.f. 01/11/2025, which should not be construed as a fresh appointment in either case.

The disclosures were made in good faith based on the information available at the time of filing. We request you to kindly take the above clarification on record.

Thanking you.

FOR PAUL MERCHANTS LIMITED
Sd/-
HARDAM SINGH
COMPANY SECRETARY
MEMBERSHIP NO: FCS 5046

FORM NO. MGT-8

[Pursuant to section 92(2) of the Companies Act, 2013 and rule 11(2) of Companies (Management and Administration) Rules, 2014]

CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

I have examined the registers, records, books, and papers of **PAUL MERCHANTS LIMITED** (the Company) as required to be maintained under the Companies Act, 2013 ('the Act') and the rules made thereunder for the financial year ended on 31st March, 2026. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the company, its officers and agents, I 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 thereof;
3. filing of forms and returns as stated in the annual return, with the Registrar of Companies, and other authorities within the prescribed time ;
4. calling/convening/holding meetings of Board of directors or its committees, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings, have been properly recorded in the Minute Books/registers maintained for the purpose and the same have been signed ;
5. closure of register of members,
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. transfer or transmission of shares; however there were no instances of allotment or buy back of securities or redemption of preference shares or debentures, alteration or reduction of share capital/ conversion of shares/ securities during the financial year.
9. keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act: Not Applicable, as no rights of shareholders kept in abeyance during the financial year.
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. However, the company was not liable to transfer any amount to the Investor Education & Protection Fund;
11. signing of audited financial statements as per the provisions of section 134 of the Act and report of directors as per sub - sections (3), (4) and (5) thereof ;
12. constitution/appointment/re-appointments/retirement/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;

13. appointment of auditors as per the provisions of section 139 of the Act ; Not applicable, as there were no such instances during the financial year.
14. approvals required to be taken from the Registrar, and such other authorities under the various provisions of the Act, wherever applicable ;
15. acceptance/ renewal/ repayment of deposits: Not Applicable, as the company has neither accepted nor renewed any deposits during the year.
16. borrowings from banks and public financial institutions, directors, members, and others and creation/modification/satisfaction of charges in that respect, wherever applicable;
17. Loans or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act; however, the Company has made investments in Mutual Funds during the year which are not covered under the provisions of Section 186 of the Companies Act, 2013.
18. alteration of the provisions of the Memorandum and Articles of Association of the company: Not applicable, as there were no instances during the financial year.

SD/-

Kanwaljit Singh Thanewal
FCS: 5901
C.P No.: 5870
UDIN:
Peer Review Cer No. 2319/2022

Date:
Place: Chandigarh