

**FORM NO. MGT 9**  
**EXTRACT OF ANNUAL RETURN**  
**As on financial year ended on 31.03.2019**  
**Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014.**

**I.REGISTRATION & OTHER DETAILS:**

1.	CIN	L34300DL1985PLC020510
2.	Registration Date	22/03/1985
3.	Name of the Company	Sai Moh Auto Links Limited
4.	Category/Sub-category of the Company	Company Limited by Shares/Indian Non- Government Company
5.	Address of the Registered office & contact details	C-582, Saraswati Vihar, Pitampura, Delhi – 110034
6.	Whether listed company	Yes
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	M/s MAS Services Limited T-34, 2 <sup>nd</sup> Floor, Okhla Industrial Area, Phase-II, New Delhi-110020 011-26387281-83

**II.PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY** (All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

Sl. No.	Name and Description of main products / services	NIC Code of the product/service	% to total turnover of the company
1.	Wholesale Trading of Industrial Chemicals	46691	100

**III.PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES: - Not Applicable**

Sl. No.	Name and Address of the Company	CIN/GLN	Holding/Subsidiary/ Associate	% of Shares Held	Applicable Section
-	-	-	-	-	-

**IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)****i) Category-wise Share Holding**

Category of Shareholders	No. of Shares held at the beginning of the year[As on 1st-April-2018]				No. of Shares held at the end of the year[As on 31-March-2019]				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
<b>A. Promoters</b>									
(1) <b>Indian</b>									
a) Individual/ HUF	8,58,650	1,53,800	10,12,450	30.66	10,12,450	-	1012450	30.66	0.00
b) Central Govt	-	-	-	-	-	-	-	-	-
c) State Govt(s)	-	-	-	-	-	-	-	-	-
d) Bodies Corp.	-	-	-	-	-	-	-	-	-
e) Banks / FI	-	-	-	-	-	-	-	-	-
f) Any other	-	-	-	-	-	-	-	-	-
<b>Sub-total(A)(1):-</b>	8,58,650	1,53,800	10,12,450	30.66	10,12,450	-	1012450	30.66	0.00
<b>(2) Foreign</b>									
a) NRIs-Individual	-	-	-	-	-	-	-	-	-

b)Other-Individuals	-	-	-	-	-	-	-	-	-
c)Bodies Corporate	-	-	-	-	-	-	-	-	-
d)Banks/FI	-	-	-	-	-	-	-	-	-
e) Any Other	-	-	-	-	-	-	-	-	-
<b>Sub-total (A)(2):-</b>	-	-	-	-	-	-	-	-	-
<b>Total shareholding of Promoter (A)=(A)(1)+(A)(2)</b>	<b>8,58,650</b>	<b>1,53,800</b>	<b>10,12,450</b>	<b>30.66</b>	<b>10,12,450</b>	<b>-</b>	<b>1012450</b>	<b>30.66</b>	<b>0.00</b>
<b>B. Public Shareholding</b>									
<b>1. Institutions</b>									
a) Mutual Funds	-	-	-	-	-	-	-	-	-
b) Banks / FI	-	-	-	-	-	-	-	-	-
c) Central Govt	-	-	-	-	-	-	-	-	-
d) State Govt(s)	-	-	-	-	-	-	-	-	-
e) Venture Capital Funds	-	-	-	-	-	-	-	-	-
f) Insurance Companies	-	-	-	-	-	-	-	-	-
g) FIs	-	-	-	-	-	-	-	-	-
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others (specify)	-	-	-	-	-	-	-	-	-
<b>Sub-total (B)(1):-</b>	-	-	-	-	-	-	-	-	-
<b>2. Non-Institutions</b>									
a) Bodies Corp.	21,979	5,100	27,079	0.82	21,979	5100	270,79	0.82	0.00
i) Indian	-	-	-	-	-	-	-	-	-
ii) Overseas	-	-	-	-	-	-	-	-	-
b) Individuals									
i) Individual shareholders holding nominal share capital up to Rs. 2 lakh	22,391	61,700	84,091	2.55	22,398	54,800	77,198	2.33	(0.22)
ii) Individual shareholders holding nominal share capital in excess of Rs.2 lakh	4,56,780	17,22,100	21,78,880	65.98	4,56,773	17,29,000	21,85,773	66.19	0.21
c) Others (specify)	-	-	-	-	-	-	-	-	-
<b>Sub-total (B)(2):-</b>	<b>5,01,150</b>	<b>17,88,900</b>	<b>22,90,050</b>	<b>69.34</b>	<b>5,01,150</b>	<b>17,88,900</b>	<b>22,90,050</b>	<b>69.34</b>	<b>0.00</b>
<b>Total Public Shareholding (B)=(B)(1)+ (B)(2)</b>	<b>5,01,150</b>	<b>17,88,900</b>	<b>22,90,050</b>	<b>69.34</b>	<b>5,01,150</b>	<b>17,88,900</b>	<b>22,90,050</b>	<b>69.34</b>	<b>0.00</b>
<b>C. Shares held by Custodian for GDRs &amp; ADRs</b>	-	-	-	-	-	-	-	-	-
<b>Grand Total (A+B+C)</b>	<b>13,59,800</b>	<b>19,42,700</b>	<b>33,02,500</b>	<b>100</b>	<b>1513600</b>	<b>17,88,900</b>	<b>33,02,500</b>	<b>100</b>	<b>-</b>

## II) Shareholding of Promoter-

Sl. No.	Shareholder's Name	Shareholding at the beginning of the year [As on 1st-April-2018]			Shareholding at the end of the year [As on 31st-March-2019]			% change in shareholding during the year
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	
1.	Mr. Anand Kumar	6,68,949	20.26	-	6,68,949	20.26	-	0
2.	Mr. Arpit Goel	3,43,501	10.40	-	3,43,501	10.40	-	0
	<b>Total</b>	<b>10,12,450</b>	<b>30.66</b>	<b>-</b>	<b>10,12,450</b>	<b>30.66</b>	<b>-</b>	<b>0</b>

iii) Change in Promoters' Shareholding (please specify, if there is no change): There is No Change in Promoter's Shareholding during the year under Review.

## iv) Shareholding Pattern of top ten Shareholders:

(Other than Directors, Promoters and Holders of GDRs and ADRs):

Sl. No.	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year [As on 1st-April-2018]		Date	Increase/ Decrease in Shareholding	Reason	Cumulative Shareholding during the Year (1st-April-2017 to 31 <sup>st</sup> -March, 2018)	
		No. of shares	% of total shares of the company				No. of shares	% of total shares of the company
<b>1. Ms. Vijay Kumar</b>								
	At the beginning of the year	3,94,300	11.939					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	Nil	No Change	N.A	Nil	Nil
	At the end of the year	-	-	-	-	-	3,94,300	11.939
<b>2. Mr. Shri Bhagwan</b>								
	At the beginning of the year	1,56,000	4.724					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	Nil	Nil	Nil	No Change	N.A	NA	NA
	At the end of the year	-	-	-	-	-	1,56,000	4.724

<b>3. Mr. Sunil Kumar</b>								
	At the beginning of the year	1,52,400	4.615					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	N.A	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,52,400	4.615
<b>4. Ms. Monika</b>								
	At the beginning of the year	1,52,080	4.605					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,52,080	4.605
<b>5. Mr. Karan Bhatia</b>								
	At the beginning of the year	1,51,900	4.600					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,51,900	4.600
<b>6. Mr. Rakesh Chand Sharma</b>								
	At the beginning of the year	1,51,600	4.590					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,51,600	4.590

<b>7. Mr. Sachin Garg</b>								
	At the beginning of the year	1,50,200	4.55					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	06-07-2018 13-07-2018 20-07-2018	Decrease Decrease Decrease	Sale Sale Sale	150199 150194 150193	4.548
	At the end of the year	Nil	Nil	Nil	Nil	Nil	150193	4.548
<b>8. Mr. Varun Gupta</b>								
	At the beginning of the year	1,48,000	4.48					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,48,000	4.48
<b>9. Mr. Anil Kumar Goyal</b>								
	At the beginning of the year	1,21,300	3.67					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,21,300	3.67
<b>10. Mr. Ajay Kumar Goel</b>								
	At the beginning of the year	1,30,100	3.94					
	Date wise Increase / Decrease in Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.)	Nil	Nil	NA	No Change	NA	NA	NA
	At the end of the year	Nil	Nil	Nil	Nil	Nil	1,30,100	3.94

**v) Shareholding of Directors and Key Managerial Personnel:**

Sl.No.	Shareholding of each Directors and each Key Managerial Personnel*	Shareholding at the beginning of the year [As on 1st-April-2018]		Cumulative Shareholding during the Year (1st-April-2018 to 31st-March, 2019)	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
<b>1. Mr. Anand Kumar</b>					
	At the beginning of the year	6,68,949	20.256	N.A	N.A
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.): Purchase of Shares as on 31.03.2019	NA	NA	N.A	N.A
	At the end of the year	-	-	6,68,949	20.256
<b>2. Mr. Arpit Goel</b>					
	At the beginning of the year	3,43,501	10.401	N.A	N.A
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment / transfer / bonus/ sweat equity etc.):	N.A	N.A	N.A	N.A
	At the end of the year	-	-	3,43,501	10.401

**V) INDEBTEDNESS** -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	-	3,46,26,820	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	-	3,46,26,820	-	-
Change in Indebtedness during the financial year				
* Addition	-	52,92,473	-	-
* Reduction	-	1,25,56,700	-	-
<b>Net Change</b>	-	(72,64,227)	-	-
Indebtedness at the end of the financial year				
i) Principal Amount	-	2,73,62,593	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
<b>Total (i+ii+iii)</b>	-	2,73,62,593	-	-

**VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL-****A. Remuneration to Managing Director, Whole-time Directors and/or Manager:**

Sl.No.	Particulars of Remuneration	Name of MD/WTD/ Manager	Total Amount
		<b>Mr. Anand Kumar</b>	
1	Gross salary	*8,14,010	*8,14,010
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	Nil	Nil
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	Nil	Nil
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	Nil	Nil
2	Stock Option	Nil	Nil
3	Sweat Equity	Nil	Nil
4	Commission - as % of profit - others, specify...	Nil	
5	Others, please specify	Nil	Nil
	<b>Total (A)</b>	8,14,010	8,14,010
	Ceiling as per the Act		

\*Mr. Anand Kumar, Managing Director of the Company has received Rs. 8,14,010 as Remuneration during the year under review.

**B. Remuneration to other directors**

Sl.No..	Particulars of Remuneration	Name of Directors		Total Amount	
		Mr. Shashi Yadav	Mr. Manoj Kumar Mittal		
1	Independent Directors	-	Nil	Nil	Nil
	Fee for attending board committee meetings		Nil	Nil	Nil
	Commission		Nil	Nil	Nil
	Others, please specify		Nil	Nil	Nil
	<b>Total (1)</b>		Nil	Nil	Nil
2	Other Non-Executive Directors	<b>Mr. Arpit Goel</b>			
	Fee for attending board committee meetings	Nil	Nil	Nil	Nil
	Commission	Nil	Nil	Nil	Nil
	Others, please specify	Nil	Nil	Nil	Nil
	<b>Total (2)</b>	Nil	Nil	Nil	Nil
	<b>Total (B)=(1+2)</b>	Nil	Nil	Nil	Nil
	<b>Total Managerial Remuneration</b>	Nil	Nil	Nil	Nil
	<b>Overall Ceiling as per the Act</b>	Nil	Nil	Nil	Nil

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

Sl.No.	Particulars of Remuneration	Key Managerial Personnel		
		CS	CFO	Total
1	Gross salary	*2,42,000	75,000	3,17,000
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	Nil	Nil	Nil
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	Nil	Nil	Nil
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	Nil	Nil	Nil

2	Stock Option	Nil	Nil	Nil
3	Sweat Equity	Nil	Nil	Nil
4	Commission	Nil	Nil	Nil
	- as % of profit	Nil	Nil	Nil
	others, specify...	Nil	Nil	Nil
5	Others, please specify	Nil	Nil	Nil
<b>Total</b>		2,42,000	75,000	3,17,000

**VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:**

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

For and on Behalf of the Board of  
Sai Moh Auto Links Limited

Sd/-  
(Anand Kumar)  
Chairman  
DIN: 01381489

Date: 2<sup>nd</sup> September, 2019  
Place: New Delhi

**Annexure – 3**

## Performance Evaluation Policy

### 1. Introduction

The Sai Moh Auto Links Limited (“**The Company**”) conducts its operations as per the directions provided by the Board of Directors within the framework laid down by the Companies Act, 2013 (“**the Act**”), the Articles of Association, Listing Agreement with stock exchanges and Code of Conduct and policies formulated by the Company for its internal execution. The Company’s Board of Directors is dedicated to act in good faith; exercise their judgment on an informed basis, in the best interest of the company and its stakeholders.

The Act provides that the Nomination and Remuneration Committee shall formulate the criteria for evaluation of performance of Independent Directors and the Board. Such an evaluation procedure will provide a fine system of checks and balances on the performance of the directors and will ensure that they exercise their powers in a rational manner. The Act further casts an obligation on part of the board of directors for evaluating the performance of independent directors. All