

14th August, 2024

To
The Registrar of Companies,
100, Everest, Marine Drive,
Mumbai- 400002, Maharashtra.

Subject: Reporting of incorrect or deficient secretarial/ regulatory filings of the Company, as a rectification measure against the inadvertent non-compliances

Respected Sir,

This is in relation to the recent directive issued by the Securities and Exchange Board of India (“SEBI”) setting out certain procedural formalities for companies proposing to undertake an initial public offering of equity shares, with respect to untraceable corporate records under the Companies Act, 2013 and the Companies Act, 1956.

Accordingly, in terms of the aforementioned directive and in respect of the proposed Issue and for disclosures in the Draft Red Herring Prospectus, Red Herring Prospectus and the prospectus (the “**Issue Documents**”) to be filed with the Securities and Exchange Board of India (“SEBI”), the BSE Limited (“BSE”) and the National Stock Exchange of India Limited (“NSE”, together with BSE, the “**Stock Exchanges**”) and the Registrar of Companies, we write to inform that certain errors or discrepancies made in the secretarial/ regulatory filings undertaken by the Company in the past. We confirm that these incorrect filings were made inadvertently and therefore, as a rectification measure and in good faith we are reporting these non-compliances to your office, for your record:

Sr. No.	Date of Event	Details of the statutory form	Details of the deficiency
1.	31-12-2019	Form ADT-1 for Appointment/Re-appointment in AGM of Durga Krishnamurthy & Co	Form was filed after the due date
2.	02-12-2020	Form MGT-14 for taking NCLT order on record of the Company	Form was filed after the due date
3.	30-12-2020	Form ADT-1 for Appointment/Re-appointment in AGM of Ajmera & Ajmera	Form was filed after the due date
4.	30-12-2020	Form DIR-12 for Change in Designation of Mrs. Nasseem Khan, Mr. Aasif Ahsan Khan, Mr. Amjad Adam Arbani	The Designation of the Directors were changed without proper terms and conditions, hence violation of Section 196 and 117 of Companies Act, 2013.

Sr. No.	Date of Event	Details of the statutory form	Details of the deficiency
5.	31.03.2020	Form DPT-3 for the FY 2019-20	Form was filed with NIL details and after the due date. Hence, incorrect Form DPT-3 was filed
6.	29-04-2020	Form DIR-12 for Appointment of Naseem Ahsan Khan	Mrs. Naseem Ahsan Khan was appointed as Executive directors, without proper terms and conditions, hence violation of Section 196 and 117 of Companies Act, 2013. There was pasting of signature in director consent.
7.	01-02-2021	Form MGT-14 for alteration of object clause of memorandum of association of the company by replacing existing main object clause with new clauses.	Form was filed after the due date
8.	31.03.2021	Form MSME for October 2020 to March 2021	Form was filed after the due date
9.	01-04-2021	Form DIR-12 for Appointment of Director	Mr. Hemant Anavkar was appointed as Executive director, without proper terms and conditions. Violation of 196, 117 and Form filed after the due date.
10.	20-07-2021	Form CHG-1 with Charge ID – 100481009 filed in 2021 for Axis Bank Limited	Form was filed after the due date
11.	27-08-2021	Miscellaneous	Our Company inadvertently approved amendment to the objects clause of the MoA pursuant to the Scheme of Arrangement for the second time in the EGM held on August 27, 2021. The amendment was again approved in the EGM held on February 1, 2021
12.	12-11-2021	Form CHG-1 with Charge ID – 100525912 filed in 2021 for Punjab National Bank	Form was filed after the due date
13.	30-11-2021	Form AOC-4 XBRL for FY 2020-21	Form was filed after the due date
14.	30-11-2021	Form MGT-7 for FY 2020-21	Form was filed after the due date
15.	22-12-2021	Form CHG-1 with Charge ID - 100524319 filed in 2021 for Daimler Financial Services India Private Limited	Form was filed after the due date

Sr. No.	Date of Event	Details of the statutory form	Details of the deficiency
16.	01-04-2022	Form MGT-14 filed under Section 186(3), 185 and 188(1)	Form was filed after the due date
17.	29-08-2022	Form CHG-1 with Charge ID – 100481009 in 2022 for Axis Bank Limited	Form was filed after the due date
18.	30-09-2022	Form DIR-12 for Change in Designation of Hemant Mohan Anavkar	The Designation of the Directors were changed without proper terms and conditions, hence violation of Section 196 and 117 of Companies Act, 2013.
19.	30-09-2022	Form AOC-4 XBRL for FY 2021-22	Form was filed after the due date
20.	16-01-2023	Form DIR-12 for Appointment of Director of Chirag Doshi	Form was filed after the due date
21.	16-01-2023	Miscellaneous	The CTC of the Board resolution passed for appointment of the Mr. Chirag Doshi mentions that the meeting was held on January 16, 2022 instead of January 16, 2023.
22.	27-01-2023	Form CHG-1 with Charge ID – 100673713 filed for RBL Bank Ltd in 2023	Form was filed after the due date
23.	28-09-2023	Form CSR 2 for FY 2022-23	Form was filed after the due date
24.	06-11-2023	Form MGT-14 for Private Placement	Form was filed after the due date
25.	03-01-2024	Form PAS-3 for Private Placement	> Form was filed after the due date. > Date of passing of Special Resolution has been mentioned as October 13, 2023 instead of November 6, 2023 > In the list of allottees, the PAN, email id of the Allottee and particulars of consideration received if the securities were issued for consideration other than cash is missing. The number of securities held by the allottee is also missing from the list of allottees.
26.	02-02-2024	Form CHG-1 with Charge ID – 100874594 filed for HDFC Bank Ltd in 2024	Form was filed after the due date

Given our voluntary disclosure of the discrepancies and considering the nature, scope, circumstances, and extent of the offense, we respectfully request that you acknowledge the offenses and grant pardon for the incorrect filings, which were made unintentionally and without malice.

This letter shall be submitted to the SEBI and any other statutory or regulatory authorities, if and as may be required, and may be made available to the public for inspection in connection with the Issue.

We request you to take the aforesaid on record.

Thanking you.

For Fabtech Technologies Limited


Amjad Adam Arbani
Director
DIN: 02718019
Place: Mumbai

