

TWENTY SECOND ANNUAL REPORT 2009 - 2010



Shree Pacetronix Ltd.

Technology Serving Humanity

An ISO-9001 Company

BOARD OF DIRECTORS : Shri Atul Kumar Sethi, Chairman & Managing Director
Smt. Amita Sethi, Whole time Director
Shri Sushil Patni Non Executive Independent Director
Shri Anil Rathi Non Executive Independent Director
Shri Praveen K. Badjatya Non Executive Independent Director

BANKER : BANK OF INDIA
Santha Bazar, INDORE

AUDITORS : **M/s S. R. Naredi & Co.**
Chartered Accountants
204, Manas Bhawan Extn. (New Wing)
11, R. N. T. Marg.
INDORE - 452001

REGD. OFFICE & FACTORY : Plot No. 15, Sector II,
Industrial Area
Pithampur, Dist. Dhar (M.P.) 454775
Phone : 07292-411105, Fax : 07292-400418
Email : info@pacetronix.com

SHARE TRANSFER AGENT : Ankit Consultancy Private Limited
Alankar Point, II Floor,
A. B. Road, INDORE - 452001
Phone : 0731-3048602

N O T I C E

NOTICE is hereby given that 22nd Annual General Meeting of the Members of the SHREE PACETRONIX LIMITED will be held on Thursday, 30th September, 2010 at 10:30 a.m at the registered office of the company to transact the following business: -

ORDINARY BUSINESS :

1. To receive, consider and adopt the audited Balance Sheet as at 31st March 2010 and Profit and Loss Accounts for the year ended on that day together with the reports of the Auditors and Directors thereon.
2. To appoint a Director in place of Mr. Anil Rathi who retires by rotation and being eligible offers himself for re-appointment.
3. To consider re-appointment of the Auditors and fixing up of their remuneration.

SPECIAL BUSINESS:

4. To consider and, if thought fit, to pass, with or without modification(s), the following resolution, as Ordinary Resolution:
"RESOLVED THAT pursuant to the provisions of section 257 of the Companies Act, 1956 and other applicable provisions, if any, consent of the members be and are hereby accorded for the appointment of Shri Praveen Kumar Badjatya as an Independent non-executive director of the Company whose office shall be determined by retirement by rotation."
5. To consider and, if thought fit, to pass, with or without modification(s), the following resolution, as Special Resolution:
"RESOLVED THAT pursuant to the provisions of Section 269, 309, 310, Schedule XIII and other applicable provisions of the Companies Act, 1956, consent of the members of the Company be and is hereby accorded to re-appoint Mr. Atul Kumar Sethi as the Managing Director of the Company for a further period of Three years commencing from the 1st December, 2010 on the following terms and conditions as given below:
 Basic Salary : Rs. 1,60,000 = 00 per month with an annual increment @ 10%
 Perquisites : Rs. 40,000 = 00 towards H.R.A
 Medical expense, Provident fund and leave travel allowance as eligible.
5. To consider and, if thought fit, to pass, with or without modification(s), the following resolution, as Special Resolution:
"RESOLVED THAT pursuant to the provisions of Section 269, 309, 310, Schedule XIII and other applicable provisions of the Companies Act, 1956, consent of the members of the Company be and is hereby accorded to re-appoint Mrs. Amita Sethi as the Whole time Director of the Company for a further period of Three years commencing from the 1st December, 2010 on the following terms and conditions as given below:
 Basic Salary : Rs. 40,000 = 00 per month with an annual increment @ 10%
 Perquisites : Rs. 10,000 = 00 towards H.R.A
 Medical expense, Provident fund and leave travel allowance as eligible.

By order of the Board of Directors of
Shree Pacetronix Limited

Atul Sethi

Chairman & Managing Director

PLACE : Pithampur

DATE : 15th July, 2010

NOTES:

1. **A MEMBER ENTITLED TO ATTEND AND VOTE AT THE MEETING IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE INSTEAD OF HIMSELF AND THE PROXY NEED NOT BE A MEMBER OF THE COMPANY. PROXIES IN ORDER TO EFFECTIVE MUST BE RECEIVED BY THE COMPANY NOT LESS THAN 48 HOURS BEFORE THE TIME FIXED FOR THE MEETING.**
2. The Members are requested to:
 - a. Intimate changes, if any, in their registered addresses immediately.
 - b. Quote their ledger folio number in all their correspondence.
 - c. Hand over the enclosed attendance slip, duly signed in accordance with their specimen signatures registered with the company for admission to the meeting place.
 - d. Bring their Annual Report and Attendance Slips with them at the AGM venue.
3. The Register of Members and Share Transfer Books of the company shall remain closed from 29/09/2010 to 30/09/2010 (both days inclusive).
4. The report on the Corporate Governance and Management Discussion and Analysis also form part to the report of the Directors.
5. Members seeking any information are requested to write to the company at least 10 days before the date of the AGM to enable the management to reply appropriately at the AGM.
6. Members are requested to notify immediately any change in their address to their respective Depository Participants (DPs) in respect of their electronic share accounts and to the Registrar and Share Transfer Agent of the Company at M/s Ankit Consultancy Pvt. Ltd., Alankar Point, A. B. Road, II Floor, A. B. Road, Indore – 452 001.
7. Explanatory Statement is attached to the Notice as per Section 173 of the Companies Act, 1956.
8. Corporate Members intending to send their authorized representatives to attend the Annual General Meeting are advised to send a duly certified copy of the Board Resolution authorizing their representatives to attend and vote at the Meeting.

EXPLANATORY STATEMENT IN TERMS OF SECTION 173 OF THE COMPANIES ACT, 1956.**Item No : 4.**

One of the Independent Directors, Shri Bansilal Baid has resigned. In order to maintain the proper composition of the executive, non-executive and independent director, broad basing of the Board of Directors becomes essential. Accordingly Shri Praveen Kumar Badjatya has been inducted in the Board as Additional Director on the Board Meeting held on 15th July 2010, in term of the provisions of Section 260 of the Companies Act, 1956 to replace the aforesaid outgoing director. In compliance with the provisions of section 257 of the Act the Company has received a notice proposing his name for regular appointment by the members in the ensuing Annual General Meeting, hence your directors recommend this resolution, However, none of the directors except Shri Praveen Kumar Badjatya may be deemed as concerned or interested in the resolution.

Item No : 5 & 6.

Shri Atul Kumar Sethi and Smt. Amita Sethi are the Managing Director and Whole Time Director respectively of the Company. They were re-appointed for the term of Three years from 1st December 2007 which is coming to expire. Their experience, commitment and capabilities are playing a crucial role in the growth of the Company. Thus the Board of Directors feel that there is a need for a continuation of suitable plans and program and therefore, it is imminent that these persons continue in the capacity of Managing Director and Whole Time Director respectively.

The resolution is recommend due to aforesaid commercial reasons read with the legal provisions of the Companies Act which requires the consent of the members in the General Meeting; hence your directors recommend this resolution. However, none of the directors except Shri Atul Kumar Sethi and Smt. Amita Sethi, may be deemed as concerned or interested in the resolutions.

*By order of the Board of Directors of
Shree Pacetronix Limited*

PLACE: Pithampur
DATE: 15th July, 2010

Atul Sethi
Chairman & Managing Director

**DETAILS OF DIRECTOR SEEKING APPOINTMENT/REAPPOINTMENT IN THE
ENSUING ANNUAL GENERAL MEETING**

| Name of Directors | MR. ATUL KUMAR SETHI | MRS. AMITA SETHI | MR. ANIL RATHI | MR. PRAVEEN KUMAR BADJATYA |
|---|---|--|---|--|
| Date of Birth | 17.04.1962 | 01.06.1966 | 05.02.1954 | 21.08.1964 |
| Date of Appointment | 11.01.1988 | 11.01.1988 | 25.07.2008 | 15.07.2010 |
| Expertise/ Experience in Specific functional areas | 23 years. experience in Managing & Implementing Industrial Undertaking | Having 14 years experience in Management of Industrial Undertaking | 32 Years experience in Marketing of Medical Instrumentation, Financies, and Management of Industrial Automation. | More than 20 year experience incommercial Business. |
| No. of Equity Shares held* | 614456 | 93092 | 500 | |
| List of outside Company directorship held | 1. Shree Coratomic Limited 2. Sethi Resins Pvt. Ltd. | 1. Shree Coratomic Limited 2. Sethi Resins Pvt. Ltd. | 1. Rathi Electronic Appl. 2. Magnum Distilleries Ltd. 3. Modern Circuits Pvt. Ltd. | NIL |
| Chairman / Member of the Committees of the Board of Directors of the Company | Chairman Shareholders/ Investors Grievance Committee | NIL | Member Audit Committee Remuneration Committee Shareholders/ Investors Grievance Committee | Member Audit Committee Remuneration Committee |
| Chairman / Member of the Committees of the Board Directors of other Companies in which he is director | NIL | NIL | NIL | NIL |

* Share holding as on 30-6-2010

DIRECTORS' REPORT

Dear Members,

Your Directors have pleasure in presenting the Twenty Second Annual Report and Audited Accounts of the Company for the year ended 31st March, 2010.

| FINANCIAL RESULTS | 31.03.2010 | 31.03.2009 |
|---------------------------------------|-------------------|-------------------|
| Turnover including other Income | 606.67 | 581.96 |
| Profit before interest & depreciation | 95.19 | 95.41 |
| Interest & other charges | 32.07 | 23.13 |
| Depreciation | 38.58 | 40.40 |
| Profit before Tax | 24.53 | 31.88 |
| Less : Provision for Tax : | | |
| Current Tax | 9.64 | 5.44 |
| Fringe Benefit Tax - | 0.87 | 3.35 |
| Deferred Tax - | -1.65 | 4.19 |
| Net Profit after Tax | 15.68 | 18.90 |

PERFORMANCE REVIEW & FUTURE OUTLOOK

The company recorded a total turnover of **Rs. 595.51 Lacs** In year 2009 -2010 against a previous turnover of **Rs. 567.30 Lacs** Export sale was **Rs.52.64 Lacs** Compared to **Rs. 67.78 Lacs** Respectively.

The Directors have to report that the mobile X-Ray failed to perform qualitatively and hence a decision was taken to stop the production of the same and further investment as well.

The company has now capacity to increase production of Pacemakers and the growth and sale of pacemakers in continuing, especially from exports,. At the same time the indigeneous sale and profitability thereof has decreased due to price and strong competition from multinationals. The company had embarked on the development of a microchip for Rs.200.00 lac, which will not only lower the cost of pacemaker production but also enable the company to develop high profitable and advance implantable pacemakers which have very good export prospects as well. The microchip will be available for trials in September/October 2010. Thereafter the same will be incorporated with redesigning of all circuitry for existing pacemaker range of the company. The Interest liability in the next 5 years along with repayment of term loan sanctioned from Bank of India for the above project will affect the overall profitability of the company. The company has made all efforts to decrease the manufacturing and administrative costs to meet the above eventuality. With intense Research efforts, the company was able to successfully develop the screw in lead and completely indigenized the VVI Rate responsive pacemakers thus reducing the import costs and increase the profitability thru sale of these pacemakers. The R&D is working on new advanced products such as Dual Chamber Rate Responsive pacemaker, Biventricular Pacemaker and its Leads, Implantable Neuro -stimulators, CPAP (Continuous Positive Air Pressure) machine and Deep Brain Stimulation Generators, these products do not require additional machineries for manufacturing of the same. The Directors also have to inform that the company has been working with NSTL, Govt. of India in developing for the first time in India, Cochlear Implants and Deep Brain Stimulation pacemakers and its Leads. These products and its technology will eventually be licenced to the company. The company will become the 4th company in the world to manufacture Cochlear Implants, which will bring the company increased revenue and recognition world wide.

DIRECTORATE

Shri Bansilal Baid has resigned from the Board. The Board places on record its appreciation of the services rendered by the said Non executive Independent Director during their tenure as Director of the Company. Shri Praveen Kumar Badjatya has been appointed as additional director of the Company in the Board Meeting held on 15th July 2010, In term of the requirements of section 257 of the Companies Act, 1956, Shri Praveen Kumar Badjatya would be appointed as Director of the Company liable to retire by rotation, of which Notice along with a deposit of Rs. 500/- have been received from member signifying their intention to propose Shri Praveen Kumar Badjatya as Director of the Company, hence approval of the member is being sought for the appointment.

In term of the provision of the Company Act, 1956 Shri Anil Rathi would retire by rotation at the forthcoming Annual General Meeting of the Company and being eligible offer himself for reappointment. Shri Atul Kumar Sethi and Smt. Amita Sethi completed his term of Three years as the Managing Director and Whole Time Director of the Company, your Directors proposes for his reappointment as the Managing Director and Whole Time Director of the Company subject to approval of the shareholders in the ensuing AGM. There is no other change in the Directorate of the Company during the year under review.

DIRECTORS RESPONSIBILITY STATEMENT

Pursuant to the provisions of Section 217 (2AA) of the Companies Act, 1956, the Board confirms that:

- (a) The financial statements are in full conformity with the requirements of the Companies Act, 1956, and applicable accounting standards have been followed along with proper explanation relating to material departure.
- (b) The directors have selected such accounting policies and applied them consistently and made judgment and estimates that were reasonable and prudent so as to give true and fair view of the state of affairs of the Company at the end of the financial year and of the loss of the company for the year under review.
- (c) The Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- (d) The Directors have prepared the Annual Accounts for the financial year ended 31st March 2010 on going concern basis.

AUDITORS AND AUDITORS' REPORT

M/s S. R. Naredi & Co. Chartered Accountants, Indore retire at the conclusion of the ensuring Annual General Meeting. They have signified their willingness to accept re-appointment and have further confirmed their eligibility under section 224 (1-B) of the Companies Act, 1956. The observations of the Auditors made in their Auditors' Report are suitably explained in the Notes to the Accounts.

CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUT GO.

The details required under section 217 (1) (e) of The Companies Act, 1956 are given in the annexure and forms part of this report. as Annexure - I

PUBLIC DEPOSITS

During the year, the Company has not accepted any public deposits within the meaning of Section 58A of the Companies Act, 1956 and the rules made there under.

CORPORATE GOVERNANCE

A report on corporate governance is enclosed containing details as required by the listing agreement which is forming part of the report of the Board of Directors. as Annexure - IV

COMPLIANCE CERTIFICATE

The Company has received the Compliance Certificate form the Practicing Company Secretary which is forming part of the report of the Board of Directors. as Annexure - II

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

The Management Discussion and Analysis report covering the matters listed in Clause 49 of the Listing Agreement for the Year under review is given as a separate statement in the Annual Report. as Annexure - III

SUBSIDIARY COMPANY

As required under section 212 of the Companies Act, 1956, the Audited Accounts together with the reports of the Directors and Auditors are attached.

HUMAN RESOURCES

The relations with the employees continued to be cordial and satisfactory throughout the year. Your Directors wish to place on record their deep sense of appreciation for the devoted services, of all employees of the Company for their sustained efforts in improving the operational efficiencies.

PARTICULARS OF EMPLOYEES

None of the employees, of the Company is covered under Section 217 (2A) of the Companies Act, 1956 read with the Companies (Particulars of Employees) Rules, 1975 and amendments thereto from time to time.

APPRECIATION

Your Directors wish to place on record their appreciation for the continued co-operation and support given to the Company by its Customers, Shareholders, Bankers, and Central & State Governments including all those associated with the Company

Place : Pithampur
Date : 15th July, 2010

For and on behalf of the Board of Directors of
Shree Pacetronix Limited

(ATUL KUMAR SETHI)
(Chairman & Managing Director)

Annexure - I

Information pursuant to Section 217(1) (e) of the Companies Act, 1956 read with the Companies (Disclosure of particulars in the report of board of Directors) Rules, 1988 forming part of the Directors' Report for the year ended 31st March 2010.

ANNEXURE TO THE DIRECTORS' REPORT

(As required under section 217 (1) (e) of the Companies Act, 1956)

I. CONSERVATION OF ENERGY

The Company continued its efforts to conserve energy by installing various equipments and utilities. Regular inspection of such equipments have been carried out. The above measures have resulted in controlling of energy consumption.

FORM - A

Form for disclosure of particulars with respect to conservation of energy.

| | 31.03.2010 | 31.03.2009 |
|--|------------|------------|
| A. POWER & FUEL CONSUMPTION | | |
| 1. Electricity | | |
| (a) Purchased | | |
| Units (Nos.) | 117271 | 115197 |
| Total Amount (Rs.) | 728790 | 742391 |
| Rate/Unit (Rs.) | 6.21 | 6.44 |
| (b) Own Generation | | |
| (i) Through diesel generator | | |
| Units (Nos.) | NIL | NIL |
| Units/litre of diesel oil (Nos.) | NIL | NIL |
| Cost/Unit (Rs.) | NIL | NIL |
| (ii) Through steam Turbine/generator | | |
| | NIL | NIL |
| 2. Coal | NIL | NIL |
| 3. Furnace Oil | NIL | NIL |
| B. CONSUMPTION PER UNIT OF PRODUCTION | | |
| Production of Pacemakers (Nos.) | 2048 | 2116 |
| Electricity (Units) | 57.26 | 54.44 |
| Furnace Oil | NIL | NIL |
| Coal | NIL | NIL |

II. TECHNOLOGY ABSORPTION**FORM - B**

Form for disclosure of particulars with respect to absorption.

RESEARCH AND DEVELOPMENT (R & D)

- | | |
|--|---|
| <ol style="list-style-type: none"> Specific areas in which R & D carried out by the Company. Benefits derived as a result of the above R & D. Future plan of action. Expenditure on R & D. | <p>The Company is developing various components in-house.</p> <p>Reducing dependence on the import and improvement in the quality.</p> <p>To continue R & D for new products & indigenisation.</p> <p>Charged to respective head of accounts.</p> |
|--|---|

TECHNOLOGY ABSORPTION, ADOPTION AND INNOVATION

- The efforts have been made towards Technology absorption & adoption of Technology received from M/s. Bio-Pace Technology Inc., USA for the manufacture of Cardiac Pacemakers.
- Benefits derived as a result of above efforts i. e. product improvement, cost reduction, product development, and import substitution etc. in the manufacturing of Cardiac pacemakers.

3. In case of Imported Technology (Imported during last 17 years reckoned from beginning of the financial year) following information be furnished :
- | | |
|--|---------|
| (a) Technology imported | IN FULL |
| (b) Year of import | 1992-93 |
| (c) Has Technology been fully absorbed? | Yes |
| (d) If not fully absorbed areas where this has not taken place, reasons thereof & future plan of action. | N. A. |

III. FOREIGN EXCHANGE EARNINGS AND OUT GO

| | (Rs. in Lacs) | |
|--|---------------|------------|
| | 31/03/2010 | 31/03/2009 |
| 1. Foreign Exchange earned : | | |
| - FOB Value of Exports | 52.64 | 67.78 |
| - Job Work | 0.00 | 0.00 |
| 2. Foreign Exchange used : CIF Value of import of | | |
| - Raw Materials | 136.27 | 161.00 |
| - Capital Goods | 66.34 | 60.75 |
| - Traded Goods | 3.66 | 0.00 |
| 3. Foreign Travels : | | |
| - Directors & Others | 8.56 | 11.13 |

COMPLIANCE CERTIFICATE

[Rule 3 of Companies (Compliance Certificate) Rules, 2001]

CIN: L33112MP1988PLC004317

Authorised Capital: Rs.5,00,00,000/-

Paid-up Capital: Rs.3,59,94,000/-

To,

The Members,

SHREE PACETRONIX LIMITED

PITHAMPUR

I have examined the registers, records, books and papers of SHREE PACETRONIX LIMITED ("the Company") as required to be maintained under the Companies Act, 1956, ("the Act") and the rules made there under and also the provisions contained in the Memorandum and Articles of Association of the Company for the financial year ended on 31st March, 2010 (financial year). 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 directors and officers, I certify that in respect of the aforesaid financial year:

1. The Company has kept and maintained all registers as stated in Annexure 'A' to this certificate, as per the provisions of the Act and the rules made there under and all entries therein have been duly recorded.
2. The Company has duly filed the forms and returns as stated in Annexure 'B' to this certificate, with the Registrar of Companies, Regional Director, Central Government, Company Law Board or other authorities within the time prescribed under the Act and the rules made there under.
3. The Company, being a Limited Company, comments is not required.
4. The Board of Directors duly met 5 times in respect of which meetings, proper notices were given and the proceedings were properly recorded and signed in the Minutes Book maintained for the purpose.
5. The Company being a listed company closed its Register of Members on 24th September, 2009 to 25th September, 2009 under Section 154 of the Act.
6. The Annual General Meeting for the financial year ended on 31st March, 2009 was held on 25th September 2009 after giving due notice to the members of the Company and the resolutions passed thereat were duly recorded in Minutes Book maintained for the purpose.
7. The Company has not held any Extra-ordinary General Meeting during the financial year under review.
8. The Company has not advanced any loans to its directors or persons or firms or companies referred to under Section 295 of the Act.
9. The Company has not entered into contracts in contravention of the provisions of section 297 of the Act.
10. The Company has complied with the provisions relating to register maintained under Section 301 of the Act.
11. As there were no instances falling within the purview of Section 314 of the Act, the Company has not obtained any approvals from the Board of directors, members or Central Government, as the case may be.
12. The Company has issued duplicate certificates during the financial year by the registrar and transfer agent of the Company time to time in compliance with the provisions of the Companies Act, 1956 read with the listing agreement.
13. The Company has
 - i) delivered all the certificate of securities on allotment of shares/ lodgment thereof transfer/transmission or any other purpose in accordance with the provisions of the Act;
 - ii) Not deposited any amount in a separate Bank Account as no dividend was declared during the financial year.
 - iii) Not posted warrants to any member of the Company as no dividend declared during the financial year.
 - iv) was not required to transfer any amount to the Investor Education & Protection Fund as there was no amount due for transfer to the above said account relating to unpaid dividend, application money due for refund, matured deposits, matured debentures and interest accrued thereon as remain unpaid or unclaimed for a period of Seven years.
 - v) Duly complied with the requirements of section 217 of the Act.
14. The Board of directors of the company is duly constituted. There was appointment of Additional Director and thereafter regular appointment in the AGM of the Company. There was no appointment of alternate directors and directors to fill casual vacancies during the financial year.
15. The Company has not appointed any managing director/whole-time director/manager during the financial year.
16. The Company has not appointed any sole selling agents during the financial year.
17. The Company has not been required to obtain any approval of the Central Government, Company Law Board, Regional Director and/or such authorities prescribed under the various provisions of the Act.
18. The Directors have disclosed their interest in other firms/companies to the Board of Directors Pursuant to the provisions of the Act and the rules made there under.
19. The Company has not issued any Equity Shares during the financial year.

20. The Company has not bought back any shares during the financial year.
21. The Company has no preference shares or debentures.
22. The Company has not declared dividend nor has issued any rights shares and bonus shares.
23. The Company has not invited/accepted any deposits including any unsecured loans falling within the purview of Section 58A during the financial year.
24. The Company has borrowed the loan in Compliance of the Section 293(1) (d) of the Act.
25. The company has not made any loans or advances or given guarantees or provided securities to other bodies corporate during the financial year.
26. The Company has not altered the provisions of the Memorandum with respect to situation of the Company's registered office from one state to another during the year under scrutiny.
27. The Company has not altered the provisions of the Memorandum with respect to the objects of the Company during the year under scrutiny.
28. The Company has not altered the provisions of the Memorandum with respect to name of the Company during the year under scrutiny.
29. The Company has not altered the provisions of the Memorandum with respect to Share Capital of the Company during the year under scrutiny.
30. The company has not altered its Articles of Association during the financial year
31. There was no prosecution initiated against or show cause notices received by the Company, during the financial year, for offences under the Act.
32. The Company has not received any money as security from its employees during the financial year.
33. The Company has deposited both employee's and employer's contribution to Provident Fund with the prescribed authorities pursuant to Section 418 of the Act.

Place : INDORE
Date : 15.07.2010

Signature :
Name of the Company Secretary : ASHISH GARG
F.C.S No. 5181, C.P. No. 4423

Annexure A

Registers as maintained by the Company

1. Register of Share Transfers.
2. Register of Charges under Section 143.
3. Register of Members under Section 150.
4. Registers & Returns kept at the Registered Office viz Annual Returns under Section 163.
5. Minutes Book of Board Meeting and General Meeting under Section 193.
6. Books of Accounts under Section 209
7. Register of Contracts under Section 301
8. Register of Directors, Managing Director, Manager and Secretary under Section 303
9. Register of Director's Shareholdings under Section 307
10. Register of Inter Corporate Investments.

Annexure B

Forms and Returns as filed by the Company with Registrar of Companies, Regional Director, Central Government or other authorities during the financial year ended 31st March 2009.

| Sr. No. | Form No./Return | Filed under section | For | Date of filing filing/Date of deposit of Challans | Whether filed within prescribed time (Yes/No) | If delay in filing whether requisite additional fees paid (Yes/No) |
|---------|-----------------|---------------------|--|---|---|--|
| 1. | Balance Sheet | Sec. 220 | As on 31.03.2009 | 25.10.2009 | Yes | No |
| 2. | Annual Return | Sec. 159 | AGM held on 25.09.2009 | 23.11.2009 | Yes | No |
| 3. | Form 66 | Sec. 383 A | For the financial year ended on 31.03.2009 | 25.10.2009 | Yes | No |

Place : INDORE
Date : 15.07.2010

Signature :
Name of the Company Secretary : ASHISH GARG
F.C.S No. 5181, C.P. No. 4423