

# Integrated Governance

## Rathi Graphic Technologies Ltd.

### General information about company

Scrip code	524610	
NSE Symbol	NOTLISTED	
MSEI Symbol	NOTLISTED	
ISIN	INE886C01010	
Date of start of financial year	01-04-2024	
Date of end of financial year	31-03-2025	
Reporting Quarter Type	Yearly	
Date of Quarter Ending	31-03-2025	
Type of company	Equity	
Whether Annexure I (Part A) of the SEBI Circular dated December 31, 2024 related to Compliance Report on Corporate Governance is applicable to the entity?	true	
Whether Annexure I (Part B) of the SEBI Circular dated December 31, 2024 related to Investor Grievance Redressal Report is Applicable to the entity?	true	
Whether Annexure I (Part C) of the SEBI Circular dated December 31, 2024 related to Disclosure of Acquisition of Shares or Voting Rights in Unlisted Companies is Applicable to the entity?	false	No acquisition of shares or voting rights in unlisted company was made during the reporting quarter
Whether Annexure I (Part D) of the SEBI Circular dated December 31, 2024 related to Disclosure of Imposition of Fine or Penalty is Applicable to the entity?	false	No fine or penalty was imposed on the the Company during the reporting period.
Whether Annexure I (Part E) of the SEBI Circular dated December 31, 2024 related to Disclosure of Updates to Ongoing Tax Litigations or Disputes is Applicable to the entity?	false	There are no ongoing tax litigations or disputes against the Company.
Whether Annexure I (Part F) of the SEBI Circular dated December 31, 2024 related to Disclosure Of Loans / Guarantees / Comfort Letters / Securities Etc. is Applicable to the entity?	false	No loans/ guarantee/ security / comfort letter were given by the Company during the reporting period.
Risk management committee	false	
Market Capitalisation as per immediate previous Financial Year	Any other	
Is SCORE ID Available ?	false	
SCORE Registration ID		
Reason For No SCORE ID	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025. Score Registration is under process	
Type of Submission	Original	
Remarks (website dissemination)		

## Annexure I

### Annexure I to be submitted by listed entity on quarterly basis

#### I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory																								
Whether the listed entity has a Regular Chairperson																								
true																								
Whether Chairperson is related to MD or CEO																								
true																								
Disqualification of Directors under section 164 of the Companies Act, 2013																								
Sr no.	Title(Mr/Ms)	Name of the Director	DIN	Category 1 of directors	Category 2 of directors	Category 3 of directors	Whether the director is disqualified?	Start Date of disqualification	End Date of disqualification	Details of disqualification	Current status	Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations]	Date of passing special resolution	Initial Date of appointment	Date of Re-appointment	Date of cessation	Tenure of director(in months)	No of Directorship in listed entities including this listed entity(Refer Regulation 17A of Listing Regulations)	No of Independent Directorship in listed entities including this listed entity(Refer Regulation 17A(1) of Listing Regulations)	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations)	No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations)	Reason for Cessation	Notes for not providing PAN	Notes for not providing DIN
1	Mr	RAJ KUMAR RATHI	00009569	Executive Director	Not Applicable	MD	false				Active	NA		02-12-1991		07-02-2025		0	0	0	0	Others		
2	Mr	Anurag Yadav	00087197	Non-Executive - Independent Director	Not Applicable		false				Active	No		27-03-2006		07-02-2025	231	0	0	0	0	Others		
3	Mr	Ashok Verma	08428088	Non-Executive - Independent Director	Not Applicable		false				Active	No		20-05-2019		07-02-2025	70	0	0	0	0	Others		
4	Mr	Gaginder Kumar Gandhi	10934329	Non-Executive - Independent Director	Not Applicable		false				Active	No		07-02-2025			1.25	1	1	2	2			
5	Mr	Nikunj Daga	00360712	Executive Director	Chairperson	MD	false				Active	No		07-02-2025			1.25	1	0	2	0			
6	Mr	Sukesh Thirani	01933959	Non-Executive - Independent Director	Not Applicable		false				Active	No		07-02-2025			1.25	1	1	2	0			
7	Ms	Jyoti Jha	10930742	Non-Executive - Non Independent Director	Not Applicable		false				Active	No		07-02-2025			1.25	1	0	0	0			

## Annexure I

### II. Composition of Committees

Disclosure of notes on composition of committees explanatory

### Audit Committee Details

Whether the Audit Committee has a Regular Chairperson						true	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	10934329	Gaginder Kumar Gandhi	Non-Executive - Independent Director	Chairperson	07-02-2025		
2	00360712	Nikunj Daga	Executive Director	Member	07-02-2025		
3	01933959	Sukesh Thirani	Non-Executive - Independent Director	Member	07-02-2025		
4	00009569	RAJ KUMAR RATHI	Executive Director	Member	14-04-2018	07-02-2025	
5	00087197	Anurag Yadav	Non-Executive - Independent Director	Member	14-04-2018	07-02-2025	
6	08428088	Ashok Verma	Non-Executive - Independent Director	Member	14-04-2018	07-02-2025	

### Nomination and remuneration committee

Whether the Nomination and remuneration committee has a Regular Chairperson							true	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks	
1	10934329	Gaginder Kumar Gandhi	Non-Executive - Independent Director	Chairperson	07-02-2025			
2	01933959	Sukesh Thirani	Non-Executive - Independent Director	Member	07-02-2025			
3	10930742	Jyoti Jha	Non-Executive - Non Independent Director	Member	07-02-2025			
4	00087197	Anurag Yadav	Non-Executive - Independent Director	Chairperson	14-04-2018	07-02-2025		
5	00009569	RAJ KUMAR RATHI	Executive Director	Member	14-04-2018	07-02-2025		
6	08428088	Ashok Verma	Non-Executive - Independent Director	Member	14-04-2018	07-02-2025		

### Stakeholders Relationship Committee

Whether the Stakeholders Relationship Committee has a Regular Chairperson						true	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks
1	10934329	Gaginder Kumar Gandhi	Non-Executive - Independent Director	Chairperson	14-04-2018		
2	01933959	Sukesh Thirani	Non-Executive - Independent Director	Member	14-04-2018		
3	00360712	Nikunj Daga	Executive Director	Member	14-04-2018		
4	00087197	Anurag Yadav	Non-Executive - Independent Director	Chairperson	14-04-2018	07-02-2025	
5	00009569	RAJ KUMAR RATHI	Executive Director	Member	14-04-2018	07-02-2025	

### Annexure I

#### III. Meeting of Board of Directors

Disclosure of notes on meeting of board of directors explanatory

Sr	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Notes for not providing Date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors as on date of the meeting	Number of Directors present*(All directors including Independent Director)	Textual Information(1) No. of Independent Directors attending the meeting*
1	04-03-2025			true	4	4	2

**Text Block**

Textual Information(1)

M/s Rathi Graphic Technologies Limited (the Company) was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Honble National Company Law Tribunal, Allahabad Bench (NCLT) vide its order dated 27th July 2023, read with Honble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025. In view of above only one Board meeting was held during the FY 2024-25.



**Text Block**

Textual Information(1)

M/s Rathi Graphic Technologies Limited (the Company) was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Honble National Company Law Tribunal, Allahabad Bench (NCLT) vide its order dated 27th July 2023, read with Honble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025. No Committee meetings were held during FY 2024-25.

## Annexure I

### V. Affirmations

Sr	Subject	Compliance status (Yes/No)
1	The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	true
2	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee	true
3	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee	true
4	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c.Stakeholders relationship committee	true
5	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable the top 1000 listed entities)	NA
6	The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	true
7	The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	false
8	This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	false
9	Any comments/observations/advice of Board of Directors may be mentioned here:	Textual Information(1)

**Text Block**

Textual Information(1)

M/s Rathi Graphic Technologies Limited (the Company) was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Honble National Company Law Tribunal, Allahabad Bench (NCLT) vide its order dated 27th July 2023, read with Honble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.

### Annexure I

Sr	Subject	Compliance status
1	Name of signatory	Nikunj Daga
2	Designation	Managing Director

### Details of Cyber security incidence

Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter	false
Other details of cyber security incidence or breaches or loss of data event	
Number of cyber security incidence or breaches or loss of data event occurred during the quarter	

## Annexure II

Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)

I.Disclosure on website in terms of LODR Regulation

Sr	Item	Compliance status (Yes/No/NA)	If status is 'No' details of non-compliance may be given here.	Web address
1.1	Details of business	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
1.2	Memorandum of Association and Articles of Association	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
1.3	Brief profile of board of directors including directorship and full-time positions in body corporates	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
2	Terms and conditions of appointment of independent directors	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
3	Composition of various committees of board of directors	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
4	Code of conduct of board of directors and senior management personnel	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
5	Details of establishment of vigil mechanism/ Whistle Blower policy	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan.	
6	Criteria of making payments to non-executive directors	No	After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
7	Policy on dealing with related party transactions	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan.	
8	Policy for determining 'material' subsidiaries	No	After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
9	Details of familiarization programmes imparted to independent directors	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
10	Email address for grievance redressal and other relevant details	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan.	



	materiality as required under regulation 30(5)		order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
23	Disclosures under regulation 30(8)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
24	Statements of deviation(s) or variations(s) as specified in regulation 32	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
25	Dividend Distribution policy as per Regulation 43A(1)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
26.1	Annual return as provided under section 92 of the Companies Act, 2013	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
26.2	Employee Benefit scheme documents framed in terms of SEBI (SBEB) Regulations, 2021	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
27	Confirmation that the above disclosures are in a separate section as specified in regulation 46(2)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
28	Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updating	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.	
29	Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block]		Textual Information(1)	

### Text Block

Textual Information(1)

M/s Rathi Graphic Technologies Limited (the Company) was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Honble National Company Law Tribunal, Allahabad Bench (NCLT) vide its order dated 27th July 2023, read with Honble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025. Website updation is under process.

## Annexure II

### II. Annual Affirmations

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)	If status is 'No' details of non-compliance may be given here.
1	Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b)	Yes	
2	Board composition	17(1), 17(1A) & 17(1C), 17(1D) & 17(1E)	Yes	
3	Meeting of Board of directors	17(2)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
4	Quorum of Board meeting	17(2A)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
5	Review of Compliance Reports	17(3)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
6	Plans for orderly succession for appointments	17(4)	Yes	
7	Code of Conduct	17(5)	Yes	
8	Fees/compensation	17(6)	Yes	
9	Minimum Information	17(7)	Yes	
10	Compliance Certificate	17(8)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
11	Risk Assessment & Management	17(9)	NA	
12	Performance Evaluation of Independent Directors	17(10)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
13	Recommendation of Board	17(11)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
14	Maximum number of Directorships	17A	Yes	
15	Composition of Audit Committee	18(1)	Yes	
16	Meeting of Audit Committee	18(2)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
17	Role of Audit Committee and information to be reviewed by the audit committee	18(3)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of

				Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
18	Composition of nomination & remuneration committee	19(1) & (2)	Yes	
19	Quorum of Nomination and Remuneration Committee meeting	19(2A)	NA	
20	Meeting of Nomination and Remuneration Committee	19(3A)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
21	Role of Nomination and Remuneration Committee	19(4)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
22	Composition of Stakeholder Relationship Committee	20(1), 20(2) & 20(2A)	Yes	
23	Meeting of Stakeholders Relationship Committee	20(3A)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
24	Role of Stakeholders Relationship Committee	20(4)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
25	Composition and role of risk management committee	21(1),(2),(3),(4)	NA	
26	Meeting of Risk Management Committee	21(3A)	NA	
27	Quorum of Risk Management Committee meeting	21(3B)	NA	
28	Gap between the meetings of the Risk Management Committee	21(3C)	NA	
29	Vigil Mechanism	22	Yes	
30	Policy for related party Transaction	23(1), (1A), (5), (6), & (8)	Yes	
31	Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	NA	
32	Approval for material related party transactions	23(4)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
33	Disclosure of related party transactions on consolidated basis	23(9)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
34	Composition of Board of Directors of unlisted material Subsidiary	24(1)	NA	
35	Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	NA	
36	Alternate Director to Independent Director	25(1)	NA	
37	Maximum Tenure	25(2)	Yes	
38	Appointment, Re-appointment or removal of an Independent Director	25(2A)	Yes	

	through special resolution or the alternate mechanism			
39	Meeting of independent directors	25(3) & (4)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
40	Familiarization of independent directors	25(7)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
41	Declaration from Independent Director	25(8) & (9)	Yes	
42	Directors and Officers insurance	25(10)	No	M/s Rathi Graphic Technologies Limited ("the Company") was undergoing Corporate Insolvency Resolution Process ("CIRP") and subsequently the resolution plan ("Resolution Plan") submitted by M/s Surbhika Steels Private Limited through its unit Nikunj Udyog ("Successful Resolution Applicant") was approved by the Hon'ble National Company Law Tribunal, Allahabad Bench ("NCLT") vide its order dated 27th July 2023, read with Hon'ble NCLAT order dated 15.10.2024. As per the terms of the approved Resolution Plan, a monitoring committee ("Monitoring Committee") was constituted, to oversee the implementation of the resolution plan. After settling all the claims as per the Approved Resolution Plan, the Monitoring Committee in its meeting held on 7th February, 2025 reconstituted the Board of Directors of the Company with all the new directors dissolving the then existing Board of Directors in terms of the approved resolution plan by Hon'ble NCLT, Allahabad Bench and further handed over the control of the affairs of the Company to the new management of the Company effective from 7th February, 2025.
43	Confirmation with respect to appointment of Independent Directors who resigned from the listed entity	25(11)	Yes	
44	Memberships in Committees	26(1)	Yes	
45	Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	NA	
46	Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes	
47	Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity	26(6)	NA	
48	Vacancies in respect Key Managerial Personnel	26A(1) & 26A(2), 26A(3)	NA	
Any other information to be provided				

**Annexure II**

1	Name of signatory	Nikunj Daga
2	Designation	Managing Director

## Annexure II

### III. Affirmations

Sr	Particulars	Compliance status (Yes/No/NA)
1	The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied Any other information to be provided	NA

**Annexure II**

1	Name of signatory	Nikunj Daga
2	Designation	Managing Director

### Signatory Details

Name of signatory	Nikunj Daga
Designation of person	Managing Director
Place	Ghaziabad
Date	30-04-2025

### Investor Grievance Details

No. of investor complaints pending at the beginning of Quarter	0
No. of investor complaints received during the Quarter	0
No. of investor complaints disposed off during the Quarter	0
No. of investor complaints those remaining unresolved at the end of the Quarter	0