| General information about company                              |                              |  |  |  |  |
|--|------------------------------|--|--|--|--|
| Scrip code   | 517360                       |  |  |  |  |
| NSE Symbol   |                              |  |  |  |  |
| MSEI Symbol  |                              |  |  |  |  |
| ISIN   | INE689V01018                 |  |  |  |  |
| Name of the entity   | SBEC SYSTEMS (INDIA) LIMITED |  |  |  |  |
| Date of start of financial year                                | 01-04-2021                   |  |  |  |  |
| Date of end of financial year                                  | 31-03-2022                   |  |  |  |  |
| Reporting Quarter  | Half Yearly                  |  |  |  |  |
| Date of Report   | 30-09-2021                   |  |  |  |  |
| Risk management committee                                      | Not Applicable               |  |  |  |  |
| Market Capitalisation as per immediate previous Financial Year | Any other                    |  |  |  |  |

|    |  |                              |            |          |   |                         |                               |                     |  | Anr   | exure I                           |                       |                   |  |  |   |   |   |                                      |                                      |
|----|--|------------------------------|------------|----------|---|-------------------------|-------------------------------|---------------------|--|---|-----------------------------------|-----------------------|-------------------|--|--|---|---|---|--------------------------------------|--------------------------------------|
|    |  |                              |            |          |   |                         | Annex                         | ure l               | to be sub  | mitted b                                    | y listed e                        | ntity on q            | uarterl           | y basis                                    |  |   |   |   |                                      |                                      |
|    | I. Composition of Board of Directors                                 |                              |            |          |   |                         |                               |                     |  |   |                                   |                       |                   |  |  |   |   |   |                                      |                                      |
|    | Disclosure of notes on composition of board of directors explanatory |                              |            |          |   |                         |                               |                     |  |   |                                   |                       |                   |  |  |   |   |   |                                      |                                      |
|    |  |                              |            |          |   |                         |                               |                     | Whether t  | he listed e                                 | ntity has a l                     | Regular Cha           | irperson          | Yes  |  |   |   |   |                                      |                                      |
|    |  |                              |            |          |   |                         |                               |                     | When   | ther Chair                                  | person is re                      | lated to MD           | or CEO            | No   |  |   |   |   |                                      |                                      |
| Si | Title (Mr / Ms)  | Name of the<br>Director      | PAN        | DIN      | Category 1<br>of directors                            | Category 2 of directors | Category<br>3 of<br>directors | Date<br>of<br>Birth | Whether<br>special<br>resolution<br>passed?<br>[Refer Reg.<br>17(1A) of<br>Listing<br>Regulations] | Date of<br>passing<br>special<br>resolution | Initial Date<br>of<br>appointment | Date of Reappointment | Date of cessation | Tenure<br>of<br>director<br>(in<br>months) | No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations) | No of<br>Independent<br>Directorship<br>in listed<br>entities<br>including<br>this listed<br>entity (Refer<br>Regulation<br>17A(1) of<br>Listing<br>Regulations | Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of post of<br>Chairperson<br>in Audit/<br>Stakeholder<br>Committee<br>held in listed<br>entities<br>including<br>this listed<br>entity (Refer<br>Regulation<br>26(1) of<br>Listing<br>Regulations) | Notes for<br>not<br>providing<br>PAN | Notes for<br>not<br>providing<br>DIN |
| 1  | Mr   | VIJAY<br>KUMAR<br>MODI       | ACBPM2045E | 00004606 | Non-<br>Executive -<br>Non<br>Independent<br>Director | Chairperson             |                               | 01-<br>12-<br>1950  | NA   |   | 29-09-2004                        |                       |                   |  | 3  | 2   | 6   | 5   |                                      |                                      |
| 2  | Mr   | SHIV<br>SHANKAR<br>AGARWAL   | ABIPA2954Q | 00004840 | Executive<br>Director                                 | Not<br>Applicable       |                               | 11-<br>05-<br>1941  | NA   |   | 22-01-2008                        | 29-09-2008            |                   |  | 2  | 1   | 3   | 0   |                                      |                                      |
| 3  | Mr   | JAGDISH<br>CHANDER<br>CHAWLA | AAAPC3327N | 05316202 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable       |                               | 23-<br>02-<br>1946  | Yes  | 28-09-<br>2020                              | 21-05-2015                        | 28-09-2020            |                   | 60   | 3  | 3   | 9   | 2   |                                      |                                      |
| 4  | Mr   | SHYAM<br>BABU<br>VYAS        | ACKPV5652P | 02025415 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable       |                               | 21-<br>10-<br>1953  | NA   |   | 21-05-2015                        | 28-09-2020            |                   | 60   | 3  | 3   | 4   | 0   |                                      |                                      |

## I. Composition of Board of Directors

### Disclosure of notes on composition of board of directors explanatory

#### Whether the listed entity has a Regular Chairperson

|   |                 | Whether the isted chitty has a Regular Chair person |            |          |   |                               |                               |                     |  |   |                                   |                       |                   |  |  |  |   |   |
|---|-----------------|---|------------|----------|---|-------------------------------|-------------------------------|---------------------|--|---|-----------------------------------|-----------------------|-------------------|--|--|--|---|---|
| S | Title (Mr / Ms) | Name of the<br>Director                             | PAN        | DIN      | Category 1<br>of directors                            | Category 2<br>of<br>directors | Category<br>3 of<br>directors | Date<br>of<br>Birth | Whether<br>special<br>resolution<br>passed?<br>[Refer Reg.<br>17(1A) of<br>Listing<br>Regulations] | Date of<br>passing<br>special<br>resolution | Initial Date<br>of<br>appointment | Date of Reappointment | Date of cessation | Tenure<br>of<br>director<br>(in<br>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 | in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations) | No of pos<br>of<br>Chairperso<br>in Audit<br>Stakehold<br>Committe<br>held in list<br>entities<br>including<br>this listed<br>entity (Rel<br>Regulatio<br>26(1) of<br>Listing<br>Regulatior |
| 5 | Ms              | RITU<br>SIKKA                                       | AMXPS1045A | 06953465 | Non-<br>Executive -<br>Non<br>Independent<br>Director | Not<br>Applicable             |                               | 07-<br>12-<br>1969  | NA   |   | 24-09-2014                        |                       |                   |  | 1  | 0  | 0   | 0   |
| 6 | Mr              | ROHIT<br>GARG                                       | AHMPG9898B | 03296571 | Non-<br>Executive -<br>Non<br>Independent<br>Director | Not<br>Applicable             |                               | 16-<br>12-<br>1979  | NA   |   | 12-02-2021                        | 17-09-2021            |                   |  | 3  | 2  | 0   | 0   |
| 7 | Ms              | ASHA<br>AGARWAL                                     | AAMPA3509Q | 09026835 | Non-<br>Executive -<br>Independent<br>Director        | Not<br>Applicable             |                               | 20-<br>01-<br>1951  | NA   |   | 12-02-2021                        | 17-09-2021            |                   | 60   | 1  | 1  | 2   | 0   |

| Au | Audit Committee Details |                           |   |                         |                        |                      |         |  |  |
|----|-------------------------|---------------------------|---|-------------------------|------------------------|----------------------|---------|--|--|
|    |                         | Wheth                     | egular Chairperson                      | Yes                     |                        |                      |         |  |  |
| Sr | DIN<br>Number           | Name of Committee members | Category 1 of directors                 | Category 2 of directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |
| 1  | 05316202                | JAGDISH CHANDER<br>CHAWLA | Non-Executive - Independent<br>Director | Chairperson             | 12-08-2015             |                      |         |  |  |
| 2  | 02025415                | SHYAM BABU VYAS           | Non-Executive - Independent<br>Director | Member                  | 01-02-2021             |                      |         |  |  |
| 3  | 00004840                | SHIV SHANKAR<br>AGARWAL   | Executive Director                      | Member                  | 28-01-2008             |                      |         |  |  |
| 4  | 09026835                | ASHA AGARWAL              | Non-Executive - Independent<br>Director | Member                  | 12-02-2021             |                      |         |  |  |

| No | Nomination and remuneration committee |                            |   |                         |                        |                      |         |  |  |
|----|---------------------------------------|----------------------------|---|-------------------------|------------------------|----------------------|---------|--|--|
|    | 7                                     | Whether the Nomination and | d remuneration committee has a Re           | egular Chairperson      | No                     |                      |         |  |  |
| Sr | DIN<br>Number                         | Name of Committee members  | Category 1 of directors                     | Category 2 of directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |
| 1  | 05316202                              | JAGDISH CHANDER<br>CHAWLA  | Non-Executive - Independent<br>Director     | Chairperson             | 12-08-2015             |                      |         |  |  |
| 2  | 02025415                              | SHYAM BABU VYAS            | Non-Executive - Independent<br>Director     | Member                  | 01-02-2021             |                      |         |  |  |
| 3  | 00004606                              | VIJAY KUMAR MODI           | Non-Executive - Non<br>Independent Director | Member                  | 13-11-2014             |                      |         |  |  |
| 4  | 09026835                              | ASHA AGARWAL               | Non-Executive - Independent<br>Director     | Member                  | 12-02-2021             |                      |         |  |  |

| Sta | Stakeholders Relationship Committee |                           |   |                         |                        |                      |         |  |  |
|-----|-------------------------------------|---------------------------|---|-------------------------|------------------------|----------------------|---------|--|--|
|     |                                     | Whether the Stakeholder   | egular Chairperson                          | Yes                     |                        |                      |         |  |  |
| Sr  | DIN<br>Number                       | Name of Committee members | Category 1 of directors                     | Category 2 of directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |
| 1   | 00004606                            | VIJAY KUMAR MODI          | Non-Executive - Non<br>Independent Director | Chairperson             | 12-08-2015             |                      |         |  |  |
| 2   | 00004840                            | SHIV SHANKAR<br>AGARWAL   | Executive Director                          | Member                  | 13-11-2014             |                      |         |  |  |
| 3   | 05316202                            | JAGDISH CHANDER<br>CHAWLA | Non-Executive - Independent<br>Director     | Member                  | 12-08-2015             |                      |         |  |  |
| 4   | 09026835                            | ASHA AGARWAL              | Non-Executive - Independent<br>Director     | Member                  | 12-02-2021             |                      |         |  |  |

| Ri | Risk Management Committee |                           |                         |                         |                        |                      |         |  |
|----|---------------------------|---------------------------|-------------------------|-------------------------|------------------------|----------------------|---------|--|
|    |                           | Whether the Risk Manage   | ment Committee has a    | Regular Chairperson     |                        |                      |         |  |
| Sr | DIN<br>Number             | Name of Committee members | Category 1 of directors | Category 2 of directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |

| Co | Corporate Social Responsibility Committee |                             |                         |                         |                        |                      |         |  |  |
|----|---|-----------------------------|-------------------------|-------------------------|------------------------|----------------------|---------|--|--|
|    | Whether th                                | e Corporate Social Responsi | bility Committee has a  | Regular Chairperson     |                        |                      |         |  |  |
| Sr | DIN<br>Number                             | Name of Committee members   | Category 1 of directors | Category 2 of directors | Date of<br>Appointment | Date of<br>Cessation | Remarks |  |  |

| Ot | Other Committee |                           |                             |   |                         |         |  |  |  |  |
|----|-----------------|---------------------------|-----------------------------|---|-------------------------|---------|--|--|--|--|
| Sr | DIN<br>Number   | Name of Committee members | Name of other committee     | Category 1 of directors                     | Category 2 of directors | Remarks |  |  |  |  |
| 1  | 00004606        | VIJAY KUMAR MODI          | SHARE TRANSFER<br>COMMITTEE | Non-Executive - Non<br>Independent Director | Chairperson             |         |  |  |  |  |
| 2  | 00004840        | SHIV SHANKAR<br>AGARWAL   | SHARE TRANSFER<br>COMMITTEE | Executive Director                          | Member                  |         |  |  |  |  |
| 3  | 05316202        | JAGDISH CHANDER<br>CHAWLA | SHARE TRANSFER<br>COMMITTEE | Non-Executive - Independent<br>Director     | Member                  |         |  |  |  |  |

|     | Annexure 1   |   |  |                                       |   |  |   |  |  |
|-----|--|---|--|---------------------------------------|---|--|---|--|--|
| An  | Annexure 1   |   |  |                                       |   |  |   |  |  |
| Ш   | III. Meeting of Board of Directors                               |   |  |                                       |   |  |   |  |  |
| Dis | Disclosure of notes on meeting of board of directors explanatory |   |  |                                       |   |  |   |  |  |
| Sr  | Date(s) of<br>meeting (if any)<br>in the previous<br>quarter     | Date(s) of<br>meeting (if any)<br>in the current<br>quarter | Maximum gap<br>between any two<br>consecutive (in<br>number of days) | Notes for<br>not<br>providing<br>Date | Whether<br>requirement of<br>Quorum met<br>(Yes/No) | Number of Directors<br>present* (other than<br>Independent Director) | No. of Independent Directors attending the meeting* |  |  |
| 1   | 17-05-2021   |   |  |                                       | Yes   | 4  | 3   |  |  |
| 2   |  | 13-08-2021  | 87   |                                       | Yes   | 2  | 2   |  |  |

# Annexure 1

## IV. Meeting of Committees

|    |  |  | Disclosure of notes of   | n meeting of            | committees                            | s explanatory |  |   |
|----|--|--|--|-------------------------|---------------------------------------|---------------|--|---|
| Sr | Name of<br>Committee                           | Date(s) of meeting (Enter<br>dates of Previous quarter<br>and Current quarter in<br>chronological order) | Maximum gap<br>between any two<br>consecutive (in<br>number of days) | Name of other committee | Reson for<br>not<br>providing<br>date | of Ouorum     | Number of Directors present* (other than Independent Director) | No. of<br>Independent<br>Directors<br>attending the<br>meeting* |
| 1  | Audit<br>Committee                             | 17-05-2021   |  |                         |                                       | Yes           | 1  | 3   |
| 2  | Audit<br>Committee                             | 13-08-2021   | 87   |                         |                                       | Yes           | 1  | 2   |
| 3  | Nomination<br>and<br>remuneration<br>committee | 13-08-2021   |  |                         |                                       | Yes           | 1  | 2   |

|             | Annexure 1   |                               |  |  |  |  |  |  |
|-------------|--|-------------------------------|--|--|--|--|--|--|
| <b>V.</b> 3 | V. Related Party Transactions  |                               |  |  |  |  |  |  |
| Sr          | Subject  | Compliance status (Yes/No/NA) | If status is "No" details of non-<br>compliance may be given here. |  |  |  |  |  |
| 1           | Whether prior approval of audit committee obtained   | NA                            |  |  |  |  |  |  |
| 2           | Whether shareholder approval obtained for material RPT   | NA                            |  |  |  |  |  |  |
| 3           | Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee | NA                            |  |  |  |  |  |  |

|     | Annexure 1   |                               |  |  |
|-----|--|-------------------------------|--|--|
| VI. | VI. Affirmations   |                               |  |  |
| Sr  | Subject  | Compliance<br>status (Yes/No) |  |  |
| 1   | The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015  | Yes                           |  |  |
| 2   | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee  | Yes                           |  |  |
| 3   | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee                                   | Yes                           |  |  |
| 4   | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee                                   | Yes                           |  |  |
| 5   | The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 500 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.                              | Yes                           |  |  |
| 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.                  | Yes                           |  |  |
| 8   | This report and/or the report submitted in the previous quarter has been placed before Board of Directors.   | Yes                           |  |  |

|    | Annexure 1        |  |  |
|----|-------------------|--|--|
| Sr | Subject           | Compliance status                        |  |
| 1  | Name of signatory | PRIYANKA NEGI                            |  |
| 2  | Designation       | Company Secretary and Compliance Officer |  |

|     | Annexure III   |  |                                     |  |  |
|-----|--|--|-------------------------------------|--|--|
| III | III. Affirmations  |  |                                     |  |  |
| Sr  | Particulars  | Regulation<br>Number                       | Compliance<br>status<br>(Yes/No/NA) | If status is "No" details of non-compliance may be given here. |  |
| 1   | Copy of the annual report including balance sheet, profit and loss account, directors report, corporate governance report, business responsibility report displayed on website | 46(2)                                      | Yes                                 |  |  |
| 2   | Presence of Chairperson of Audit Committee at the Annual General<br>Meeting  | 18(1)(d)                                   | Yes                                 |  |  |
| 3   | Presence of Chairperson of the nomination and remuneration committee at the annual general meeting   | 19(3)                                      | Yes                                 |  |  |
| 4   | Presence of Chairperson of the Stakeholder Relationship committee at the annual general meeting  | 20(3)                                      | Yes                                 |  |  |
| 5   | Whether "Corporate Governance Report" disclosed in Annual Report   | 34(3) read with<br>para C of<br>Schedule V | Yes                                 |  |  |
|     | Any other information to be provided   |  |                                     |  |  |

|   | Annexure III      |  |
|---|-------------------|--|
| 1 | Name of signatory | PRIYANKA NEGI                            |
| 2 | Designation       | Company Secretary and Compliance Officer |

| Additional Half yearly Disclosure  |   |  |   |
|--|---|--|---|
| Applicability of disclosure  | Applicable                                  |  |   |
| Reason for Non Applicability   | Textual Information(1)                      |  |   |
| I. Disclosure of Loans/ guarantees/comfort letters /securit  | ties etc.refer note below                   |  |   |
| (A)Any loan or any other form of debt advanced by the listed   | d entity directly or indirectly to          |  |   |
| Entity   | Aggregate amount advanced during six months | Balance<br>outstanding<br>at the end of<br>six months      |   |
| Promoter or any other entity controlled by them  | 0   | 0  |   |
| Promoter Group or any other entity controlled by them  | 0   | 0  |   |
| Directors (including relatives) or any other entity controlled by them   | 0   | 0  |   |
| KMPs or any other entity controlled by them  | 0   | 0  |   |
| Entity   | Type (guarantee, comfort letter etc.)       | Aggregate<br>amount of<br>issuance<br>during six<br>months | Balance<br>outstanding at the<br>end of six<br>months(taking into<br>account any<br>invocation) |
| Promoter or any other entity controlled by them  | 0   | 0  | mvocation)  |
| B  |   |  | 0   |
| Promoter Group or any other entity controlled by them  | 0   | 0  | ,   |
| Promoter Group or any other entity controlled by them  Directors (including relatives) or any other entity controlled by them  | 0   | 0  | 0   |
| Directors (including relatives) or any other entity controlled   |   |  | 0   |
| Directors (including relatives) or any other entity controlled by them  KMPs or any other entity controlled by them  (C) Any security provided by the listed entity of | 0   | 0  | 0 0 0 0   |
| Directors (including relatives) or any other entity controlled by them  KMPs or any other entity controlled by them  | 0   | 0  | 0 0 0 0   |

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|   | •                         |                      |                           |
|---|---------------------------|----------------------|---------------------------|
| Promoter or any other entity controlled by them   | 0                         | 0                    | 0                         |
| Promoter Group or any other entity controlled by them   | 0                         | 0                    | 0                         |
| Directors (including relatives) or any other entity controlled by them  | 0                         | 0                    | 0                         |
| KMPs or any other entity controlled by them   | 0                         | 0                    | 0                         |
| (D) Additional Information  | Textual<br>Information(2) |                      |                           |
| II. Affirmations  |                           |                      |                           |
| Affirmations Compliance Status  |                           | Compliance<br>Status | Company Remarks           |
| All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company. |                           |                      | Textual<br>Information(3) |
| Name  | SHIV SHANKAR AGARWAL      |                      |                           |
| Designation   | CEO                       |                      |                           |
| Place   | NEW DELHI                 |                      |                           |
| Date  | 19-10-2021                |                      |                           |

| Signatory Details     |  |
|-----------------------|--|
| Name of signatory     | PRIYANKA NEGI                            |
| Designation of person | Company Secretary and Compliance Officer |
| Place                 | NEW DELHI                                |
| Date                  | 19-10-2021                               |