

**MINISTRY OF CORPORATE AFFAIRS  
RECEIPT  
G.A.R.7**

**SRN:** AC1057761/ BharatKoshOrderId :1-23804312415  
**SRN Date:** 12/01/2026 15:29:31

**Service Request Date:**  
12/01/2026

**RECEIVED FROM:**

**Name:** JASPREET SINGH

**Address:** G15 / 10A 2nd Floor, Rajouri Garden, New Delhi, New Delhi, Delhi, 110027

**ENTITY ON WHOSE BEHALF MONEY IS PAID**

**LLPIN/CIN/DIN:** L51909DL1984PLC288239

**Name:** SPICEJET LIMITED

**Address:** Indira Gandhi International Airport Terminal 1D, , New Delhi, South West Delhi, Delhi, 110037

**FULL PARTICULARS OF REMITTANCE**

**Service Type:** eFiling

| Service Description | Type of Fee | Amount (Rs.) |
|---------------------|-------------|--------------|
| Fee for MGT-7       | Normal      | 600          |
|                     | Additional  | 0            |
| <b>Total</b>        |             | <b>600</b>   |

**Mode of Payment:** Online

**Received Payment Rupees:** Six Hundred Rupees Only.

Note: The defects or incompleteness in any respect in this application as noticed shall be placed on the Ministry's website(www.mca.gov.in). In case the application is marked as RSUB, please resubmit the application within the due date. Please track the status of your transaction at all times till it is finally disposed off. (please refer Rule 10 of the Companies (Registration offices and Fees) Rules, 2014)

**Form No. MGT-7****Annual Return (other than OPCs and Small Companies)**

[Pursuant to sub-section (1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11 of the Companies (Management and Administration) Rules, 2014]

All fields marked in \* are mandatory

Refer instruction kit for filing the form



Form language

☒ English ☐ Hindi**I REGISTRATION AND OTHER DETAILS**

i \*Corporate Identity Number (CIN)

L51909DL1984PLC288239

ii (a) \*Financial year for which the annual return is being filed (From date) (DD/MM/YYYY)

01/04/2024

(b) \*Financial year for which the annual return is being filed (To date) (DD/MM/YYYY)

31/03/2025

(c) \*Type of Annual filing

☒ Original☐ Revised

(d) SRN of MGT-7 filed earlier for the same financial years

iii

| Particulars               | As on filing date  | As on the financial year end date  |
|---------------------------|--|--|
| Name of the company       | SPICEJET LIMITED   | SPICEJET LIMITED   |
| Registered office address | Indira Gandhi International Airport Terminal 1D,NA,New Delhi,South West Delhi,Delhi,India,110037 | Indira Gandhi International Airport Terminal 1D,NA,New Delhi,South West Delhi,Delhi,India,110037 |
| Latitude details          | 28.5653  | 28.5653  |
| Longitude details         | 77.1224  | 77.1224  |

(a) \*Photograph of the registered office of the Company showing external building and name prominently visible

Registered office images.pdf

(b) \*Permanent Account Number (PAN) of the company

AA\*\*\*\*\*9F

(c) \*e-mail ID of the company

\*\*\*\*\*tors@spicejet.com

(d) \*Telephone number with STD code

01\*\*\*\*\*39

| (e) Website  | <div style="border: 1px solid black; padding: 2px;">www.spicejet.com</div>          |  |  |  |  |                             |                                  |  |              |
|--|---|--|--|--|--|-----------------------------|----------------------------------|--|--------------|
| iv *Date of Incorporation (DD/MM/YYYY)   | <div style="border: 1px solid black; padding: 2px;">09/02/1984</div>                |  |  |  |  |                             |                                  |  |              |
| v (a) *Class of Company (as on the financial year end date)<br><i>(Private company/Public Company/One Person Company)</i>  | <div style="border: 1px solid black; padding: 2px;">Public company</div>            |  |  |  |  |                             |                                  |  |              |
| (b) *Category of the Company (as on the financial year end date)<br><i>(Company limited by shares/Company limited by guarantee/Unlimited company)</i>  | <div style="border: 1px solid black; padding: 2px;">Company limited by shares</div> |  |  |  |  |                             |                                  |  |              |
| (c) *Sub-category of the Company (as on the financial year end date)<br><i>(Indian Non-Government company/Union Government Company/State Government Company/<br/>Guarantee and association company/Subsidiary of Foreign Company)</i>  | <div style="border: 1px solid black; padding: 2px;">Non-government company</div>    |  |  |  |  |                             |                                  |  |              |
| vi *Whether company is having share capital (as on the financial year end date)  | <input checked="" type="radio"/> Yes <input type="radio"/> No                       |  |  |  |  |                             |                                  |  |              |
| vii (a) Whether shares listed on recognized Stock Exchange(s)  | <input checked="" type="radio"/> Yes <input type="radio"/> No                       |  |  |  |  |                             |                                  |  |              |
| (b) Details of stock exchanges where shares are listed   |   |  |  |  |  |                             |                                  |  |              |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 10%;">S. No.</th> <th style="width: 50%;">Stock Exchange Name</th> <th style="width: 40%;">Code</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">Bombay Stock Exchange (BSE)</td> <td style="text-align: center;">A1 - Bombay Stock Exchange (BSE)</td> </tr> </tbody> </table>   |   | S. No.   | Stock Exchange Name                                      | Code   | 1  | Bombay Stock Exchange (BSE) | A1 - Bombay Stock Exchange (BSE) |  |              |
| S. No.   | Stock Exchange Name   | Code   |  |  |  |                             |                                  |  |              |
| 1  | Bombay Stock Exchange (BSE)   | A1 - Bombay Stock Exchange (BSE)   |  |  |  |                             |                                  |  |              |
| viii Number of Registrar and Transfer Agent  | <div style="border: 1px solid black; padding: 2px; text-align: center;">1</div>     |  |  |  |  |                             |                                  |  |              |
| <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 20%;">CIN of the Registrar and Transfer Agent</th> <th style="width: 20%;">Name of the Registrar and Transfer Agent</th> <th style="width: 30%;">Registered office address of the Registrar and Transfer Agents</th> <th style="width: 30%;">SEBI registration number of Registrar and Transfer Agent</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">L72400MH2017PLC444072</td> <td style="text-align: center;">KFIN TECHNOLOGIES LIMITED</td> <td>301, The Centrium, 3rd Floor, 57,, Lal Bahadur Shastri Road, Nav Pada, Kurla (West), Kurla, Mumbai, Mumbai, Maharashtra, India, 400070</td> <td style="text-align: center;">INR000000221</td> </tr> </tbody> </table> |   | CIN of the Registrar and Transfer Agent  | Name of the Registrar and Transfer Agent                 | Registered office address of the Registrar and Transfer Agents | SEBI registration number of Registrar and Transfer Agent | L72400MH2017PLC444072       | KFIN TECHNOLOGIES LIMITED        | 301, The Centrium, 3rd Floor, 57,, Lal Bahadur Shastri Road, Nav Pada, Kurla (West), Kurla, Mumbai, Mumbai, Maharashtra, India, 400070 | INR000000221 |
| CIN of the Registrar and Transfer Agent  | Name of the Registrar and Transfer Agent  | Registered office address of the Registrar and Transfer Agents   | SEBI registration number of Registrar and Transfer Agent |  |  |                             |                                  |  |              |
| L72400MH2017PLC444072  | KFIN TECHNOLOGIES LIMITED   | 301, The Centrium, 3rd Floor, 57,, Lal Bahadur Shastri Road, Nav Pada, Kurla (West), Kurla, Mumbai, Mumbai, Maharashtra, India, 400070 | INR000000221   |  |  |                             |                                  |  |              |
| ix * (a) Whether Annual General Meeting (AGM) held   | <input checked="" type="radio"/> Yes <input type="radio"/> No                       |  |  |  |  |                             |                                  |  |              |
| (b) If yes, date of AGM (DD/MM/YYYY)   | <div style="border: 1px solid black; padding: 2px;">30/09/2025</div>                |  |  |  |  |                             |                                  |  |              |
| (c) Due date of AGM (DD/MM/YYYY)   | <div style="border: 1px solid black; padding: 2px;">30/09/2025</div>                |  |  |  |  |                             |                                  |  |              |
| (d) Whether any extension for AGM granted  | <input type="radio"/> Yes <input checked="" type="radio"/> No                       |  |  |  |  |                             |                                  |  |              |
| (e) If yes, provide the Service Request Number (SRN) of the GNL-1 application form filed for extension   | <div style="border: 1px solid black; height: 20px;"></div>                          |  |  |  |  |                             |                                  |  |              |

(f) Extended due date of AGM after grant of extension (DD/MM/YYYY)

(g) Specify the reasons for not holding the same

## II PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

i \*Number of business activities

1

| S. No. | Main Activity group code | Description of Main Activity group | Business Activity Code | Description of Business Activity | % of turnover of the company |
|--------|--------------------------|------------------------------------|------------------------|----------------------------------|------------------------------|
| 1      | H                        | Transportation and storage         | 51                     | Air transport                    | 92.43                        |

## III PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

i \*No. of Companies for which information is to be given

11

| S. No. | CIN /FCRN             | Other registration number | Name of the company                            | Holding/ Subsidiary/Associate/Jo int Venture | % of shares held |
|--------|-----------------------|---------------------------|--|--|------------------|
| 1      | U72900DL2019PTC349253 |                           | SPICEJET INTERACTIVE PRIVATE LIMITED           | Subsidiary                                   | 100              |
| 2      | U74999DL2019PTC356527 |                           | SPICE CLUB PRIVATE LIMITED                     | Subsidiary                                   | 100              |
| 3      | U62100DL2019PTC356667 |                           | SPICE SHUTTLE PRIVATE LIMITED                  | Subsidiary                                   | 100              |
| 4      | U63030DL2019PTC359462 |                           | SPICEEXPRESS AND LOGISTICS PRIVATE LIMITED     | Subsidiary                                   | 99.99            |
| 5      | U63030DL2020PTC371395 |                           | SPICE GROUND HANDLING SERVICES PRIVATE LIMITED | Subsidiary                                   | 100              |
| 6      | U72900DL2020PTC373102 |                           | SPICETECH SYSTEM PRIVATE LIMITED               | Subsidiary                                   | 58               |
| 7      |                       | 585991                    | AS Air Lease 41 (Ireland) Limited              | Subsidiary                                   | 100              |

|    |                       |  |  |            |     |
|----|-----------------------|--|--|------------|-----|
| 8  | U52520DL2016PTC303136 |  | SPICEJET<br>MERCHANDISE<br>PRIVATE LIMITED | Subsidiary | 100 |
| 9  | U74999DL2016PTC306819 |  | SPICEJET TECHNIC<br>PRIVATE LIMITED        | Subsidiary | 100 |
| 10 | U70109DL2017PTC326068 |  | CANVIN REAL<br>ESTATE PRIVATE<br>LIMITED   | Subsidiary | 100 |
| 11 | U70109DL2022PTC397726 |  | KRIHAVEN<br>PRIVATE LIMITED                | Subsidiary | 100 |

#### IV SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

##### i SHARE CAPITAL

###### (a) Equity share capital

| Particulars                               | Authorised Capital | Issued capital | Subscribed capital | Paid Up capital |
|---|--------------------|----------------|--------------------|-----------------|
| Total number of equity shares             | 2000000000         | 1413403167     | 1413397167         | 1413397167      |
| Total amount of equity shares (in rupees) | 20000000000.00     | 14134031670.00 | 14133971670.00     | 14133971670.00  |

Number of classes

1

| Class of shares                            | Authorised Capital | Issued capital | Subscribed Capital | Paid Up capital |
|--|--------------------|----------------|--------------------|-----------------|
| Equity                                     |                    |                |                    |                 |
| Number of equity shares                    | 2000000000         | 1413403167     | 1413397167         | 1413397167      |
| Nominal value per share (in rupees)        | 10                 | 10             | 10                 | 10              |
| Total amount of equity shares (in rupees ) | 20000000000.00     | 14134031670.00 | 14133971670        | 14133971670     |

###### (b) Preference share capital

| Particulars                       | Authorised Capital | Issued capital | Subscribed capital | Paid Up capital |
|-----------------------------------|--------------------|----------------|--------------------|-----------------|
| Total number of preference shares |                    |                |                    |                 |

|   |  |  |  |  |
|---|--|--|--|--|
| Total amount of preference shares (in rupees) |  |  |  |  |
|---|--|--|--|--|

Number of classes

0

| Class of shares                                | Authorised Capital | Issued capital | Subscribed Capital | Paid Up capital |
|--|--------------------|----------------|--------------------|-----------------|
| <input type="text"/>                           |                    |                |                    |                 |
| Number of preference shares                    |                    |                |                    |                 |
| Nominal value per share (in rupees)            |                    |                |                    |                 |
| Total amount of preference shares (in rupees ) |                    |                |                    |                 |

**(c) Unclassified share capital**

| Particulars                         | Authorised Capital |
|-------------------------------------|--------------------|
| Total amount of unclassified shares | 0                  |

**(d) Break-up of paid-up share capital**

| Particulars                                  | Number of shares |              |              | Total Nominal Amount | Total Paid-up amount | Total premium  |
|--|------------------|--------------|--------------|----------------------|----------------------|----------------|
|  | Physical         | DEMAT        | Total        |                      |                      |                |
| <b>(i) Equity shares</b>                     |                  |              |              |                      |                      |                |
| <b>At the beginning of the year</b>          | 47098177         | 736306540    | 783404717.00 | 7834047170           | 7834047170           |                |
| <b>Increase during the year</b>              | 0.00             | 629992450.00 | 629992450.00 | 6299924500.00        | 6299924500.00        | 28181614995.36 |
| i Public Issues                              | 0                | 0            | 0.00         | 0                    | 0                    |                |
| ii Rights issue                              | 0                | 0            | 0.00         | 0                    | 0                    |                |
| iii Bonus issue                              | 0                | 0            | 0.00         | 0                    | 0                    |                |
| iv Private Placement/ Preferential allotment | 0                | 142523514    | 142523514.00 | 1425235140           | 1425235140           | 3051744917.76  |
| v ESOPs                                      | 0                | 455950       | 455950.00    | 4559500              | 4559500              |                |
| vi Sweat equity shares allotted              | 0                | 0            | 0.00         | 0                    | 0                    |                |

| Particulars                         | Number of shares |               |               | Total Nominal Amount | Total Paid-up amount | Total premium  |
|-------------------------------------|------------------|---------------|---------------|----------------------|----------------------|----------------|
| vii Conversion of Preference share  | 0                | 0             | 0.00          | 0                    | 0                    |                |
| viii Conversion of Debentures       | 0                | 0             | 0.00          | 0                    | 0                    |                |
| ix GDRs/ADRs                        | 0                | 0             | 0.00          | 0                    | 0                    |                |
| x Others, specify<br><div>QIP</div> | 0                | 487012986     | 487012986.00  | 4870129860           | 4870129860           | 25129870077.60 |
| <b>Decrease during the year</b>     | 0.00             | 0.00          | 0.00          | 0.00                 | 0.00                 |                |
| i Buy-back of shares                | 0                | 0             | 0.00          | 0                    | 0                    |                |
| ii Shares forfeited                 | 0                | 0             | 0.00          | 0                    | 0                    |                |
| iii Reduction of share capital      | 0                | 0             | 0.00          | 0                    | 0                    |                |
| iv Others, specify<br><div></div>   |                  |               | 0.00          |                      |                      |                |
| <b>At the end of the year</b>       | 47098177.00      | 1366298990.00 | 1413397167.00 | 14133971670.00       | 14133971670.00       |                |
| <b>(ii) Preference shares</b>       |                  |               |               |                      |                      |                |
| <b>At the beginning of the year</b> | 0                | 0             | 0.00          | 0                    | 0                    |                |
| <b>Increase during the year</b>     | 0.00             | 0.00          | 0.00          | 0.00                 | 0.00                 |                |
| i Issues of shares                  | 0                | 0             | 0.00          | 0                    | 0                    |                |
| ii Re-issue of forfeited shares     | 0                | 0             | 0.00          | 0                    | 0                    |                |
| iii Others, specify<br><div></div>  |                  |               | 0.00          |                      |                      |                |
| <b>Decrease during the year</b>     | 0.00             | 0.00          | 0.00          | 0.00                 | 0.00                 |                |
| i Redemption of shares              | 0                | 0             | 0.00          | 0                    | 0                    |                |
| ii Shares forfeited                 | 0                | 0             | 0.00          | 0                    | 0                    |                |
| iii Reduction of share capital      | 0                | 0             | 0.00          | 0                    | 0                    |                |

| Particulars                       | Number of shares |      |      | Total Nominal Amount | Total Paid-up amount | Total premium |
|-----------------------------------|------------------|------|------|----------------------|----------------------|---------------|
| iv Others, specify<br><div></div> |                  |      | 0.00 |                      |                      |               |
| <b>At the end of the year</b>     | 0.00             | 0.00 | 0.00 | 0.00                 | 0.00                 |               |

ISIN of the equity shares of the company

INE285B01017

ii Details of stock split/consolidation during the year (for each class of shares)

0

| Class of shares              |                      | <div></div> |
|------------------------------|----------------------|-------------|
| Before split / Consolidation | Number of shares     |             |
|                              | Face value per share |             |
| After split / consolidation  | Number of shares     |             |
|                              | Face value per share |             |

iii Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company)

☐ Nil

Number of transfers

15

#### Attachments:

1. Details of shares/Debentures Transfers

Transfer Details\_Final.xlsm

iv Debentures (Outstanding as at the end of financial year)

(a) Non-convertible debentures

\*Number of classes

0

| Classes of non-convertible debentures | Number of units | Nominal value per unit | Total value (Outstanding at the end of the year) |
|---------------------------------------|-----------------|------------------------|--|
|                                       |                 |                        |  |
| <b>Total</b>                          |                 |                        |  |



| Classes of non-convertible debentures | Outstanding as at the beginning of the year | Increase during the year | Decrease during the year | Outstanding as at the end of the year |
|---------------------------------------|---|--------------------------|--------------------------|---------------------------------------|
|                                       |   |                          |                          |                                       |
| <b>Total</b>                          |   |                          |                          |                                       |

**(b) Partly convertible debentures**

\*Number of classes

0

| Classes of partly convertible debentures | Number of units | Nominal value per unit | Total value (Outstanding at the end of the year) |
|--|-----------------|------------------------|--|
|  |                 |                        |  |
| <b>Total</b>                             |                 |                        |  |

| Classes of partly convertible debentures | Outstanding as at the beginning of the year | Increase during the year | Decrease during the year | Outstanding as at the end of the year |
|--|---|--------------------------|--------------------------|---------------------------------------|
|  |   |                          |                          |                                       |
| <b>Total</b>                             |   |                          |                          |                                       |

**(c) Fully convertible debentures**

\*Number of classes

0

| Classes of fully convertible debentures | Number of units | Nominal value per unit | Total value (Outstanding at the end of the year) |
|---|-----------------|------------------------|--|
|   |                 |                        |  |
| <b>Total</b>                            |                 |                        |  |

| Classes of fully convertible debentures | Outstanding as at the beginning of the year | Increase during the year | Decrease during the year | Outstanding as at the end of the year |
|---|---|--------------------------|--------------------------|---------------------------------------|
|   |   |                          |                          |                                       |

|       |  |  |  |  |
|-------|--|--|--|--|
| Total |  |  |  |  |
|-------|--|--|--|--|

**(d) Summary of Indebtedness**

| Particulars                   | Outstanding as at the beginning of the year | Increase during the year | Decrease during the year | Outstanding as at the end of the year |
|-------------------------------|---|--------------------------|--------------------------|---------------------------------------|
| Non-convertible debentures    |   |                          |                          |                                       |
| Partly convertible debentures |   |                          |                          |                                       |
| Fully convertible debentures  |   |                          |                          |                                       |
| <b>Total</b>                  |   |                          |                          |                                       |

**v Securities (other than shares and debentures)**

1

| Type of Securities     | Number of Securities | Nominal Value of each Unit | Total Nominal Value | Paid up Value of each Unit | Total Paid up Value |
|------------------------|----------------------|----------------------------|---------------------|----------------------------|---------------------|
| Warrants (Convertible) | 101818334            | 10                         | 1018183340          | 2.5                        | 254545835           |
| <b>Total</b>           | 101818334.00         |                            | 1018183340.00       |                            | 254545835.00        |

**V Turnover and net worth of the company (as defined in the Companies Act, 2013)**

i \*Turnover

52839970000

ii \* Net worth of the Company

6830220000

**VI SHARE HOLDING PATTERN**

**A Promoters**

| S. No | Category                          | Equity           |            | Preference       |            |
|-------|-----------------------------------|------------------|------------|------------------|------------|
|       |                                   | Number of shares | Percentage | Number of shares | Percentage |
| 1     | Individual/Hindu Undivided Family |                  |            |                  |            |
|       | (i) Indian                        | 307312384        | 21.74      | 0                | 0.00       |

|    |   |              |       |      |      |
|----|---|--------------|-------|------|------|
|    | (ii) Non-resident Indian (NRI)          | 0            | 0.00  | 0    | 0.00 |
|    | (iii) Foreign national (other than NRI) | 0            | 0.00  | 0    | 0.00 |
| 2  | Government                              |              |       |      |      |
|    | (i) Central Government                  | 0            | 0.00  | 0    | 0.00 |
|    | (ii) State Government                   | 0            | 0.00  | 0    | 0.00 |
|    | (iii) Government companies              | 0            | 0.00  | 0    | 0.00 |
| 3  | Insurance companies                     | 0            | 0.00  | 0    | 0.00 |
| 4  | Banks                                   | 0            | 0.00  | 0    | 0.00 |
| 5  | Financial institutions                  | 0            | 0.00  | 0    | 0.00 |
| 6  | Foreign institutional investors         | 0            | 0.00  | 0    | 0.00 |
| 7  | Mutual funds                            | 0            | 0.00  | 0    | 0.00 |
| 8  | Venture capital                         | 0            | 0.00  | 0    | 0.00 |
| 9  | Body corporate (not mentioned above)    | 165580514    | 11.72 | 0    | 0.00 |
| 10 | Others<br><div></div>                   | 0            | 0.00  | 0    | 0.00 |
|    | <b>Total</b>                            | 472892898.00 | 33.46 | 0.00 | 0.00 |

Total number of shareholders (promoters)

4

#### B Public/Other than promoters

| S. No | Category                          | Equity           |            | Preference       |            |
|-------|-----------------------------------|------------------|------------|------------------|------------|
|       |                                   | Number of shares | Percentage | Number of shares | Percentage |
| 1     | Individual/Hindu Undivided Family |                  |            |                  |            |
|       | (i) Indian                        | 459325077        | 32.50      | 0                | 0.00       |

|    |   |              |       |      |      |
|----|---|--------------|-------|------|------|
|    | (ii) Non-resident Indian (NRI)          | 12154035     | 0.86  | 0    | 0.00 |
|    | (iii) Foreign national (other than NRI) | 300          | 0.00  | 0    | 0.00 |
| 2  | Government                              |              |       |      |      |
|    | (i) Central Government                  | 0            | 0.00  | 0    | 0.00 |
|    | (ii) State Government                   | 0            | 0.00  | 0    | 0.00 |
|    | (iii) Government companies              | 0            | 0.00  | 0    | 0.00 |
| 3  | Insurance companies                     | 0            | 0.00  | 0    | 0.00 |
| 4  | Banks                                   | 0            | 0.00  | 0    | 0.00 |
| 5  | Financial institutions                  | 0            | 0.00  | 0    | 0.00 |
| 6  | Foreign institutional investors         | 31153621     | 2.20  | 0    | 0.00 |
| 7  | Mutual funds                            | 35783050     | 2.53  | 0    | 0.00 |
| 8  | Venture capital                         | 0            | 0.00  | 0    | 0.00 |
| 9  | Body corporate (not mentioned above)    | 198001251    | 14.01 | 0    | 0.00 |
| 10 | Others                                  | 204086935    | 14.44 | 0    | 0.00 |
|    | HUF, FPI and others                     |              |       |      |      |
|    | <b>Total</b>                            | 940504269.00 | 66.54 | 0.00 | 0.00 |

Total number of shareholders (other than promoters)

432112

Total number of shareholders (Promoters + Public/Other than promoters)

432116.00

Breakup of total number of shareholders (Promoters + Other than promoters)

| Sl.No | Category                 |           |
|-------|--------------------------|-----------|
| 1     | Individual - Female      | 77026     |
| 2     | Individual - Male        | 227956    |
| 3     | Individual - Transgender | 1         |
| 4     | Other than individuals   | 127133    |
|       | <b>Total</b>             | 432116.00 |

**C Details of Foreign institutional investors' (FIIs) holding shares of the company**

1

| Name of the FII                              | Address                                    | Date of Incorporation | Country of Incorporation | Number of shares held | % of shares held |
|--|--|-----------------------|--------------------------|-----------------------|------------------|
| DISCOVERY GLOBAL OPPORTUNITY (MAURITIUS) LTD | Level 5 Alexander House 35 Cybercity Ebene | 18/07/2008            | Mauritius                | 31153621              | 2.20             |

**VII NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS**

[Details of Promoters, Members (other than promoters), Debenture holders]

| Details                        | At the beginning of the year | At the end of the year |
|--------------------------------|------------------------------|------------------------|
| Promoters                      | 4                            | 4                      |
| Members (other than promoters) | 406084                       | 432116                 |
| Debenture holders              | 0                            | 0                      |

**VIII DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL**

**A Composition of Board of Directors**

| Category              | Number of directors at the beginning of the year |               | Number of directors at the end of the year |               | Percentage of shares held by directors as at the end of year |               |
|-----------------------|--|---------------|--|---------------|--|---------------|
|                       | Executive  | Non-executive | Executive                                  | Non-executive | Executive  | Non-executive |
| <b>A Promoter</b>     | 1  | 1             | 1  | 1             | 18.54  | 0             |
| <b>B Non-Promoter</b> | 0  | 3             | 0  | 4             | 0.00   | 0.00          |

|   |   |   |   |   |       |      |
|---|---|---|---|---|-------|------|
| i Non-Independent                       | 0 | 0 | 0 | 0 | 0     | 0    |
| ii Independent                          | 0 | 3 | 0 | 4 | 0     | 0    |
| <b>C Nominee Directors representing</b> | 0 | 0 | 0 | 0 | 0.00  | 0.00 |
| i. Banks and FIs                        | 0 | 0 | 0 | 0 | 0     | 0    |
| ii Investing institutions               | 0 | 0 | 0 | 0 | 0     | 0    |
| iii Government                          | 0 | 0 | 0 | 0 | 0     | 0    |
| iv Small share holders                  | 0 | 0 | 0 | 0 | 0     | 0    |
| v Others                                | 0 | 0 | 0 | 0 | 0     | 0    |
| <b>Total</b>                            | 1 | 4 | 1 | 5 | 18.54 | 0.00 |

\*Number of Directors and Key managerial personnel (who is not director) as on the financial year end date

7

**B (i) Details of directors and Key managerial personnel as on the closure of financial year**

| Name                    | DIN/PAN    | Designation       | Number of equity shares held | Date of cessation (after closure of financial year : If any) (DD/MM/YYYY) |
|-------------------------|------------|-------------------|------------------------------|---|
| AJAY SINGH              | 01360684   | Managing Director | 261994988                    |   |
| SHIWANI SINGH           | 05229788   | Director          | 6001                         |   |
| AJAY CHHOTELAL AGGARWAL | 00001122   | Director          | 15000                        |   |
| MANOJ KUMAR             | 00072634   | Director          | 0                            |   |
| ANURAG BHARGAVA         | 01297542   | Director          | 0                            |   |
| SONUM GAYATRI           | 10639147   | Director          | 0                            |   |
| CHANDAN SAND            | ASYP53888C | Company Secretary | 369142                       |   |

**B (ii) \*Particulars of change in director(s) and Key managerial personnel during the year**

1

| Name          | DIN/PAN  | Designation at the beginning / during the financial year | Date of appointment/ change in designation/ cessation (DD/MM/YYYY) | Nature of change (Appointment/ Change in designation/ Cessation) |
|---------------|----------|--|--|--|
| SONUM GAYATRI | 10639147 | Director   | 20/09/2024   | Appointment  |

**IX MEETINGS OF MEMBERS/CLASS OF MEMBERS/ BOARD/COMMITTEES OF THE BOARD OF DIRECTORS****A MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS**

\*Number of meetings held

1

| Type of meeting | Date of meeting<br>(DD/MM/YYYY) | Total Number of<br>Members entitled to<br>attend meeting | Attendance                       |                         |
|-----------------|---------------------------------|--|----------------------------------|-------------------------|
|                 |                                 |  | Number of<br>members<br>attended | % of total shareholding |
| AGM             | 30/12/2024                      | 433741   | 327                              | 47.34                   |

**B BOARD MEETINGS**

\*Number of meetings held

6

| S.No | Date of meeting<br>(DD/MM/YYYY) | Total Number of directors<br>as on the date of<br>meeting | Attendance                      |                 |
|------|---------------------------------|---|---------------------------------|-----------------|
|      |                                 |   | Number of directors<br>attended | % of attendance |
| 1    | 15/07/2024                      | 5   | 5                               | 100.00          |
| 2    | 23/07/2024                      | 5   | 4                               | 80.00           |
| 3    | 14/08/2024                      | 5   | 5                               | 100.00          |
| 4    | 14/09/2024                      | 5   | 3                               | 60.00           |
| 5    | 12/11/2024                      | 6   | 3                               | 50.00           |
| 6    | 25/02/2025                      | 6   | 5                               | 83.33           |

**C COMMITTEE MEETINGS**

Number of meetings held

9

| S.No | Type of meeting | Date of meeting<br>(DD/MM/YYYY) | Total Number of<br>Members as on the<br>date of meeting | Attendance                    |                 |
|------|-----------------|---------------------------------|---|-------------------------------|-----------------|
|      |                 |                                 |   | Number of members<br>attended | % of attendance |

|   |                                       |            |   |   |        |
|---|---------------------------------------|------------|---|---|--------|
| 1 | Audit Committee Meeting               | 15/07/2024 | 4 | 4 | 100.00 |
| 2 | Audit Committee Meeting               | 14/08/2024 | 4 | 4 | 100.00 |
| 3 | Audit Committee Meeting               | 25/02/2025 | 4 | 3 | 75.00  |
| 4 | Nomination and Remuneration Committee | 15/07/2024 | 3 | 2 | 66.67  |
| 5 | Nomination and Remuneration Committee | 14/09/2024 | 3 | 3 | 100.00 |
| 6 | Stakeholders Relationship Committee   | 25/02/2025 | 3 | 3 | 100.00 |
| 7 | Risk Management Committee             | 15/07/2024 | 3 | 3 | 100.00 |
| 8 | Risk Management Committee             | 12/11/2024 | 3 | 2 | 66.67  |
| 9 | CSR Committee Meeting                 | 25/02/2025 | 3 | 3 | 100.00 |

#### D ATTENDANCE OF DIRECTORS

| S. No | Name of the Director    | Board Meetings   |                             |                 | Committee Meetings                                       |                             |                 | Whether attended AGM held on |
|-------|-------------------------|--|-----------------------------|-----------------|--|-----------------------------|-----------------|------------------------------|
|       |                         | Number of Meetings which director was entitled to attend | Number of Meetings attended | % of attendance | Number of Meetings which director was entitled to attend | Number of Meetings attended | % of attendance |                              |
|       |                         |  |                             |                 |  |                             |                 | 30/09/2025<br>(Y/N/NA)       |
| 1     | AJAY SINGH              | 6  | 6                           | 100.00          | 6  | 6                           | 100.00          | Yes                          |
| 2     | SHIWANI SINGH           | 6  | 5                           | 83.33           | 5  | 5                           | 100.00          | No                           |
| 3     | AJAY CHHOTELAL AGGARWAL | 6  | 5                           | 83.33           | 5  | 5                           | 100.00          | Yes                          |
| 4     | MANOJ KUMAR             | 6  | 5                           | 83.33           | 6  | 6                           | 100.00          | Yes                          |
| 5     | ANURAG BHARGAVA         | 6  | 2                           | 33.33           | 5  | 3                           | 60.00           | No                           |
| 6     | SONUM GAYATRI           | 2  | 1                           | 50.00           | 0  | 0                           | 0.00            | Yes                          |

#### X REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

☐ Nil



A \*Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

1

| S. No. | Name         | Designation       | Gross salary | Commission | Stock Option/ Sweat equity | Others | Total amount |
|--------|--------------|-------------------|--------------|------------|----------------------------|--------|--------------|
| 1      | Ajay Singh   | Managing director | 72000000     | 0          | 0                          | 0      | 72000000.00  |
|        | <b>Total</b> |                   | 72000000.00  | 0.00       | 0.00                       | 0.00   | 72000000.00  |

B \*Number of CEO, CFO and Company secretary whose remuneration details to be entered

2

| S. No. | Name         | Designation       | Gross salary | Commission | Stock Option/ Sweat equity | Others | Total amount |
|--------|--------------|-------------------|--------------|------------|----------------------------|--------|--------------|
| 1      | Ashish Kumar | CFO               | 13080000     | 0          | 0                          | 0      | 13080000.00  |
| 2      | Chandan Sand | Company Secretary | 16820000     | 0          | 0                          | 0      | 16820000.00  |
|        | <b>Total</b> |                   | 29900000.00  | 0.00       | 0.00                       | 0.00   | 29900000.00  |

C \*Number of other directors whose remuneration details to be entered

5

| S. No. | Name                    | Designation | Gross salary | Commission | Stock Option/ Sweat equity | Others     | Total amount |
|--------|-------------------------|-------------|--------------|------------|----------------------------|------------|--------------|
| 1      | Shiwani Singh           | Director    | 0            |            |                            | 500000     | 500000.00    |
| 2      | Ajay Chhotelal Aggarwal | Director    | 0            |            |                            | 500000     | 500000.00    |
| 3      | Manoj Kumar             | Director    | 0            |            |                            | 500000     | 500000.00    |
| 4      | Anurag Bhargava         | Director    | 0            |            |                            | 200000     | 200000.00    |
| 5      | Sonum Gayatri           | Director    | 0            |            |                            | 100000     | 100000.00    |
|        | <b>Total</b>            |             | 0.00         | 0.00       | 0.00                       | 1800000.00 | 1800000.00   |

#### XI MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

A \*Whether the company has made compliances and disclosures in respect of applicable provisions of the Companies Act, 2013 during the year

☒ Yes

☐ No

B If No, give reasons/observations

## XII PENALTY AND PUNISHMENT – DETAILS THEREOF

A \*DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/  
DIRECTORS/OFFICERS

☒ Nil

| Name of the company/<br>directors/<br>officers | Name of the court/ concerned<br>Authority | Date of Order<br>(DD/MM/YYYY) | Name of the Act and<br>section under which<br>penalised / punished | Details of<br>penalty/<br>punishment | Details of appeal<br>(if any) including<br>present status |
|--|---|-------------------------------|--|--------------------------------------|---|
|  |   |                               |  |                                      |   |

B \*DETAILS OF COMPOUNDING OF OFFENCES

☒ Nil

| Name of the company/<br>directors/<br>officers | Name of the court/ concerned<br>Authority | Date of Order<br>(DD/MM/YYYY) | Name of the Act and<br>section under which<br>offence committed | Particulars of<br>offence | Amount of<br>compounding (in<br>rupees) |
|--|---|-------------------------------|---|---------------------------|---|
|  |   |                               |   |                           |   |

## XIII Details of Shareholder / Debenture holder

Number of shareholder/ debenture holder

432116

## XIV Attachments

(a) List of share holders, debenture holders

Details of Shareholder or  
Debenture holder-2.xlsm  
Details of Shareholder or  
Debenture holder-3.xlsm  
Details of Shareholder or  
Debenture holder-1.xlsm  
Details of Shareholder or  
Debenture holder-4.xlsm

(b) Optional Attachment(s), if any

SPICEJET\_FPC FPI  
HOLDING\_31.03.2025\_signed.pdf  
SpiceJet Annual Report\_2024-  
25.pdf  
Signed\_MGT-8\_SpiceJet\_2024-  
25\_SpiceJet Limited.pdf

## XV COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

### I/We certify that:

- (a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
- (b) Unless otherwise expressly stated to the contrary elsewhere in this return, the Company has complied with applicable provisions of the Act during the financial year.
- (c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.
- (d) Where the annual return discloses the fact that the number of members, (except in case of one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

I/ We have examined the registers, records and books and papers of SPICEJET LIMITED as required to be maintained under the Companies Act, 2013 (the Act) and the rules made thereunder for the financial year ended on (DD/MM/YYYY) 31/03/2025

In my/ our opinion and to the best of my information and according to the examinations carried out by me/ us and explanations furnished to me/ us by the company, its officers and agents, I/ we certify that:

A The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.

B During the aforesaid financial year the Company has complied with provisions of the Act & Rules made there under in respect of:

- 1 its status under the Act;
- 2 maintenance of registers/records & making entries therein within the time prescribed therefor;
- 3 filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within/beyond the prescribed time;
- 4 calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed;
- 5 closure of Register of Members / Security holders, as the case may be.
- 6 advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
- 7 contracts/arrangements with related parties as specified in section 188 of the Act;
- 8 issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances;
- 9 keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act
- 10 declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act;
- 11 signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub-sections (3), (4) and (5) thereof;
- 12 constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key

Managerial Personnel and the remuneration paid to them;

13 appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;

14 approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;

15 acceptance/ renewal/ repayment of deposits;

16 borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;

17 loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act ;

18 alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

To be digitally signed by

Name

Mahesh Kumar Gupta

Date (DD/MM/YYYY)

06/01/2026

Place

Gurugram

Whether associate or fellow:

☐ Associate

☒ Fellow

Certificate of practice number

1\*9\*

#### XVI Declaration under Rule 9(4) of the Companies (Management and Administration) Rules, 2014

\*(a) DIN/PAN/Membership number of Designated Person

01360684

\*(b) Name of the Designated Person

AJAY SINGH

#### Declaration

I am authorised by the Board of Directors of the Company vide resolution number\* 20 dated\*

(DD/MM/YYYY) 22/01/2016 to sign this form and declare that all the requirements of Companies Act, 2013

and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been complied with. I further declare that:

1 Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.

2 All the required attachments have been completely and legibly attached to this form.

**\*To be digitally signed by**

**\*Designation**

*(Director /Liquidator/ Interim Resolution Professional (IRP)/Resolution Professional (RP))*

Director

**\*DIN of the Director; or PAN of the Interim Resolution Professional (IRP) or Resolution Professional (RP) or Liquidator**

0\*3\*0\*8\*

**\*To be digitally signed by**

☒ Company Secretary ☐ Company secretary in practice

**\*Whether associate or fellow:**

☐ Associate ☒ Fellow

**Membership number**

9\*8\*

**Certificate of practice number**

**Note: Attention is drawn to provisions of Section 448 and 449 of the Companies Act, 2013 which provide for punishment for false statement / certificate and punishment for false evidence respectively.**

***For office use only:***

**eForm Service request number (SRN)**

AC1057761

**eForm filing date (DD/MM/YYYY)**

12/01/2026

**This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company**



# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex , Chamber No. 110, Ground Floor , D-288-289/10, Laxmi Nagar, Delhi-110092  
Phone : 011-49503085; 9312406331; E-Mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

### Form No. MGT-8

[Pursuant to Section 92(2) of the Companies Act, 2013 and Rule 11(2) of Companies (Management and Administration) Rules, 2014]

### CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

We have examined the registers, records and books and papers of **SpiceJet Limited** (the "**Company**") as required to be maintained under the Companies Act, 2013 (the "**Act**") and the rules made thereunder for the financial year ended on March 31, 2025. In our opinion and to the best of our information and according to the examinations carried out by us and explanations furnished to us by the Company, its officers and agents, we certify that:

- A. the Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. during the aforesaid financial year, the Company has complied with provisions of the Act and rules made there under (*subject to the observations made in Secretarial Audit Report of the Company for financial year ended on March 31, 2025 attached hereunder*) in respect of:
  1. its status under the Act;
  2. maintenance of registers/records and making entries therein within the time prescribed therefor;
  3. filing of forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities within the prescribed time *except few instances of delay in filing of forms with the Registrar of Companies which were file along with payment of additional fee;*
  4. calling/ convening/ holding meetings of Board of Directors or its committees, if any, and the meetings of the members of the Company on due dates as stated in the Annual Return in respect of which meetings, proper notices were given and the proceedings including the circular resolutions and resolutions passed by postal ballot, if any, have been properly recorded in the Minutes Book/registers maintained for the purpose and the same have been signed.
  5. closure of Register of Members / Security holders, as the case may be.
  6. advances/loans to its directors and/or persons or firms or companies referred in section 185 of the Act;
  7. contracts/arrangements with related parties as specified in section 188 of the Act;
  8. issue or allotment or transfer or transmission or buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities and issue of security certificates in all instances:

*No event in respect of buy back of securities/ redemption of preference shares or debentures/ alteration or reduction of share capital/ conversion of shares/ securities took place during the aforesaid financial year except conversion of warrants into equity shares of the Company.*



9. keeping in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares in compliance with the provisions of the Act (no event under this para took place during the financial year);
10. declaration/ payment of dividend; transfer of unpaid/ unclaimed dividend/other amounts as applicable to the Investor Education and Protection Fund in accordance with section 125 of the Act (not applicable for aforesaid financial year);
11. signing of audited financial statement as per the provisions of section 134 of the Act and report of directors is as per sub - sections (3), (4) and (5) thereof;
12. constitution/ appointment/ re-appointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them;
13. appointment/ reappointment/ filling up casual vacancies of auditors as per the provisions of section 139 of the Act;
14. approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act;
15. acceptance/ renewal/ repayment of deposits subject to following observations:

*The Company had, in earlier financial years, received amounts aggregating to Rs.5,790.90 million from Mr. Kalanithi Maran and KAL Airways Private Limited (together, "Erstwhile Promoters") as advance money towards proposed allotment/subscription of certain securities (189,091,378 share warrants and 3,750,000 non-convertible cumulative redeemable preference shares, issuable based on approvals to be obtained), to be adjusted at the time those securities were to be issued. Pursuant to the legal proceedings in this regard before the Hon'ble High Court of Delhi ("Court") between the Erstwhile Promoters, the present promoter and the Company, the Company was required to secure an amount of Rs.3,290.89 million through a bank guarantee in favour of the Registrar General of the Court ("Registrar") and to deposit the balance amount of Rs.2,500 million with the Registrar. The Company has complied with these requirements in September 2017.*

*The parties to the aforementioned litigation concurrently initiated arbitration proceedings before a three-member arbitral tribunal (the "Tribunal"), which pronounced its award on July 20, 2018 (the "Award"). In terms of the Award, the Company was required to (a) refund an amount of approximately Rs.3,082.19 million to the counterparty, (b) explore the possibility of allotting non-convertible cumulative redeemable preference shares in respect of Rs.2,708.70 million, failing which, refund such amount to the counterparty and (c) pay interest calculated to be Rs.924.66 million (being interest on the amount stated under (a) above, in terms of the Award). The amounts referred to under (a) and (b) above, aggregating Rs.5,790.89 million, continue to be carried as current liabilities without prejudice to the rights of the Company under law. Further, the Company was entitled to receive from the counterparty, under the said Award, an amount of Rs.290.00 million of past interest/servicing charges. Consequent to the Award and without prejudice to the rights and remedies it may have in the matter, the Company accounted for Rs.634.66 million as an exceptional item (net) during the year ended March 31, 2019, being the net effect of amount referred to under (c) and counter claim receivable of Rs.290.00 million, above.*

*The Company deposited the entire principal of Rs.5,790.9 million as per the direction of the Court in September 2017 which has also been subsequently paid to the counterparty and there are adjustments to be made for the counter-claim of the Company. The Company has additionally paid in aggregate Rs.1,500.00 million to the counterparties pursuant to Court orders dated August 24, 2023 and February 02, 2024 while keeping open the rights and contentions in pending litigations. All the payment made to the counterparties has been included under other non-current assets.*



*The Company, its present promoter and the counterparties challenged various aspects of the Award, including the above-mentioned interest obligations and rights, under Section 34 of the Arbitration and Conciliation Act, 1996 which was dismissed by the Court vide its judgments dated July 31, 2023. Thereafter, the Company and its present promoter preferred an appeal under Section 37 of the Arbitration and Conciliation Act, 1996 before the Division Bench of the Court, inter-alia, challenging the payment of entire interest amount and payment of early refund of Rs.2,708.70 million towards non-convertible cumulative redeemable preference shares. The Division Bench vide its judgment dated May 17, 2024 set aside the judgments dated July 31, 2023 of the Court and ordered to restore the petitions under Section 34 of the Arbitration and Conciliation Act, 1996 filed by the Company and present promoter before the appropriate Court for being considered afresh and bearing in mind the observations rendered by the Division Bench in its judgment dated May 17, 2024. Accordingly, this matter is sub-judice as on date.*

*Erstwhile Promoters had also preferred an appeal under Section 37 of the Arbitration and Conciliation Act, 1996 before the Division Bench of the Court, inter-alia, seeking damages of more than Rs.13,000 Million which was dismissed by the said Division Bench vide its order dated May 23, 2025. The Hon'ble Supreme Court subsequently upheld the decision and dismissed the Special Leave Petition filed by the Erstwhile Promoters on 23 July 2025. These assertions were already thoroughly examined and subsequently rejected by the Arbitral Tribunal, the panel of three retired Supreme Court judges and the Single-Judge Bench of the Court.*

*In view of the foregoing and pending outcome of the aforesaid challenges at the Court and legal advice obtained, the management is of the view that no material liability is likely to arise from aforesaid matter and accordingly, no further adjustments have been made in this regard, to these standalone financial results. The auditors have included 'Emphasis of Matter' paragraph in their audit report in this regard.*

16. borrowings from its directors, members, public financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable;
17. loans and investments or guarantees given or providing of securities to other bodies corporate or persons falling under the provisions of section 186 of the Act;
18. alteration of the provisions of the Memorandum and/ or Articles of Association of the Company;

**For Mahesh Gupta & Co.  
Company Secretaries**



**Mahesh Kumar Gupta**  
**Proprietor**  
**FCS: 2870; C.P.: 1999**  
**UDIN: F002870G002475648**



Place: Delhi

Date: December 17, 2025

**Note: This report shall be read with Secretarial Audit Report of SpiceJet Limited for financial year ended March 31, 2025.**





# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092

Phone: 011-49503085; 9312406331; e-mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

### Secretarial Audit Report for financial year ended on March 31, 2025

*(Pursuant to Section 204(1) of the Companies Act, 2013 and Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014)*

To,  
The Members,  
SpiceJet Limited,  
Indira Gandhi International Airport,  
Terminal 1D, New Delhi – 110037

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by SpiceJet Limited (the “Company”). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

My responsibility is to express an opinion on the compliance of the applicable laws and maintenance of records based on audit. I have conducted the audit in accordance with the applicable Auditing Standards issued by the Institute of Company Secretaries of India. The Auditing Standards require that the Auditor shall comply with statutory and regulatory requirements and plan and perform the audit to obtain reasonable assurance about compliance with applicable laws and maintenance of records.

Based on my verification of the Company’s books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorised representatives during the conduct of Secretarial Audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on March 31, 2025, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on March 31, 2025 according to the provisions of:

- (i) The Companies Act, 2013 (the “Act”) and the rules made thereunder;
- (ii) The Securities Contracts (Regulation) Act, 1956 (“SCRA”) and the rules made thereunder;
- (iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iv) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- (v) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (“SEBI Act”);
  - a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
  - b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
  - c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018
  - d) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021
  - e) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021– Nil<sup>#</sup>
  - f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client





# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092

Phone: 011-49503085; 9312406331; e-mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 – Nil<sup>#</sup>

h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 – Nil<sup>#</sup>

<sup>#</sup>No event took place under these regulations during the financial year under review.

(vi) The Company is engaged in the business of scheduled air transport services. The management has identified and confirmed the following laws as being specifically applicable to the Company:

- The Aircraft Act, 1934 and Rules made thereunder;
- The Aircraft (Carriage of Dangerous Goods) Rules, 2003;
- The Carriage by Air Act, 1972;
- The Regulations, Circulars, Requirements, Orders, Notifications, issued by Ministry of Civil Aviation, Bureau of Civil Aviation Security and the Directorate General of Civil Aviation.

I have also examined compliance with the applicable clauses of Secretarial Standards issued by the Institute of Company Secretaries of India and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (the “SEBI Listing Regulations”).

I report that during the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards etc. mentioned above subject to following observation:

1. The annual general meeting of the Company for financial year ended on March 31, 2024 was held on December 30, 2024 and the chairperson of the audit committee was not present at the said annual general meeting.
2. The interval between two consecutive board meetings (i.e. January 25, 2024 and July 15, 2024) was more than one hundred and twenty days. Further, the Company has conducted only three audit committee meeting (i.e. on July 15, 2024, August 14, 2024 and February 25, 2025) during the review period.
3. There was delay in following submission with stock exchange:
  - (a) financial results by the Company for financial year ended March 31, 2024 and quarters ended September 30, 2024 and December 31, 2024;
  - (b) disclosure on related party transactions for six months ended September 30, 2024; and
  - (c) monitoring agency report for quarters ended March 31, 2024, September 30, 2024 and December 31, 2024.
4. The Company has not disclosed the reasons for delay in submission of financial results for year ended March 31, 2024 and quarters ended September 30, 2024 and December 31, 2024 in terms of SEBI circulars.
5. The Company has necessary software to maintain structured digital database of unpublished price sensitive information in terms of Regulation 3(5) and 3(6) SEBI (Prohibition of Insider Trading) Regulation, 2015 and such database is being maintained internally with adequate internal control and checks. Although, during the review period, no entry has been maintained in the software, there are entries found in the financial year 2025-26 and the Company has committed to ensure compliance from April 2025 onwards.





# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092

Phone: 011-49503085; 9312406331; e-mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

6. As reported in the Secretarial Audit Report for previous financial year, the Company had, in earlier financial years, received amounts aggregating Rs.5,790.9 million from its erstwhile promoters as advance money towards proposed allotment of certain securities (18,091,378 share warrants and 3,750,000 non-convertible cumulative redeemable preference shares, issuable based on approvals to be obtained), to be adjusted at the time those securities were to be issued. In this regard, we draw your attention to Note No. 50 of the standalone financial statements of the Company for financial year ended March 31, 2025.
7. Undisputed statutory dues including goods and services tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and other material statutory dues, as applicable, have not been regularly deposited with the appropriate authorities and there have been significant delays in a large number of cases. In this regard, we draw your attention to Note No. 48 on the standalone financial statements for the year ended March 31, 2025.

I further report that the Board of Directors of the Company is duly constituted with proper balance of executive directors, non-executive directors and independent directors except as stated herein above. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all Directors to schedule the Board Meetings. Necessary approvals were obtained as per applicable provisions for meeting conducted at shorter notice. Agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

Majority decision at Board Meeting and Committee Meetings are carried out unanimously and the views of dissenting members, if any, are captured and recorded as part of the minutes of the Meetings of Board of Directors or Committees of the Board, as the case may be.

I further report that, based on the information provided and the representation made by the Company and also on the review of the compliance reports taken on record by the Board of Directors of the Company, there are systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that the Company has issued and allotted following securities during the period under review:

- (a) 1,00,00,000 equity shares of the face value of Rs.10 each at an issue price of Rs.50.00 each on preferential basis to non-promoter group on May 13, 2024 consequent upon conversion equivalent number of warrants allotted on February 21, 2024 on preferential basis.
- (b) 1,20,000 equity shares of Rs.10 (Rupees Ten) each under Employee Stock Option Scheme of the Company on July 15, 2024;
- (c) 33,000 equity shares of Rs.10 (Rupees Ten) each under Employee Stock Option Scheme of the Company on August 14, 2024;





# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092


Phone: 011-49503085; 9312406331; e-mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

- (d) 11,15,000 equity shares of the face value of Rs.10 each at an issue price of Rs.50.00 each on preferential basis to non-promoter group on August 14, 2024 consequent upon conversion of equivalent number of warrants allotted on January 25, 2025 on preferential basis.
- (e) 48,70,12,986 equity shares of the face value of Rs.10 each at an issue price of Rs.61.60 each, to various Qualified Institutional Buyers under Qualified Institutional Placement held on September 20, 2024;
- (f) 3,02,950 equity shares of Rs.10 (Rupees Ten) each under Employee Stock Option Scheme of the Company on February 25, 2025;
- (g) 13,14,08,514 equity shares of the face value of Rs.10 each at an issue price of Rs.29.84 each on preferential basis to promoter group on March 18, 2025 consequent upon conversion of equivalent number of warrants allotted on September 4, 2023 on preferential basis.

The compliance by the Company of applicable financial laws such as direct and indirect tax laws and maintenance of financial records and books of accounts have not been reviewed in this audit since the same have been subject to review by the statutory financial auditors, tax auditors, and other designated professionals.

For Mahesh Gupta & Co.  
Company Secretaries



  
Mahesh Kumar Gupta  
Proprietor

FCS 2870::CP 1999

UDIN: F002870G001097348

Peer Review No.: 6470/2025

Date: August 28, 2025  
Place: New Delhi

This report is to be read with our letter of even date which is annexed as Appendix – I and forms an integral part of this report.



# Mahesh Gupta & Co.

## Company Secretaries

Wadhwa Complex, Chamber No. 110, Ground Floor, D-288-289/10, Laxmi Nagar, Delhi – 110092

Phone: 011-49503085; 9312406331; e-mail: [maheshgupta.co@gmail.com](mailto:maheshgupta.co@gmail.com)

Appendix – I


To,  
The Members,  
SpiceJet Limited,  
Indira Gandhi International Airport,  
Terminal 1D, New Delhi – 110037

Our Secretarial Audit Report for the financial year ended March 31, 2025 is to be read along with this Appendix.

- 1) Maintenance of secretarial records is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
- 2) We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verifications were done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
- 3) We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
- 4) Where ever required, we have obtained the management representation about the compliance of laws, rules and regulation and happening of events etc.
- 5) The compliance of the provisions of corporate and other applicable laws, rules, regulations, standards is the responsibility of the management. Our examination was limited to the verification of procedures on the test basis.
- 6) The Secretarial Audit Report is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the company.

For Mahesh Gupta & Co.  
Company Secretaries



  
Mahesh Kumar Gupta  
Proprietor

Date: August 28, 2025  
Place: New Delhi

FCS 2870::CP 1999  
UDIN: F002870G001097348  
Peer Review No.: 6470/2025



| SPICEJET LTD                     |   |   |                          |                    |           |          |            |             |
|----------------------------------|---|---|--------------------------|--------------------|-----------|----------|------------|-------------|
| List of FPI/FPC as on 31/03/2025 |   |   |                          |                    |           |          |            |             |
| S/NO                             | NAME/JOINT NAME(S)  | ADDRESS   | COUNTRY OF INCORPORATION | REGN. NO WITH SEBI | HOLDING   | % TO EQT | MINOR CODE | PAN NO      |
| 1                                | DISCOVERY GLOBAL OPPORTUNITY (MAURITIUS) LTD  | Level 5 Alexander House 35 Cybercity Ebene  | MAURITIUS                | INMUF178916        | 31153621  | 2.20 FPC |            | AADC11192J  |
| 2                                | MORGAN STANLEY ASIA (SINGAPORE) PTE. - ODI  | 2 Central Boulevard #22-01 West Tower IOI Central Boulevard Towers  | SINGAPORE                | INSGFP232216       | 20295004  | 1.44 FPC |            | AAECM3575F  |
| 3                                | GOLDMAN SACHS (SINGAPORE) PTE. - ODI  | 1 RAFFLES LINKS 07 01<br>C/O Uik Bank & Trust Company (Layman) Limited LIB. Financial Centre 11 Ur Hoy's Drive PU | SINGAPORE                | INSGFP097519       | 19236358  | 1.36 FPC |            | AAFCG0345N  |
| 4                                | COHESION MK BEST IDEAS SUB-TRUST  | Box 694 Grand Cayman KY   | CAYMAN ISLANDS           | INCYFP053820       | 13595908  | 0.96 FPC |            | AACTC7026Q  |
| 5                                | SOCIETE GENERALE - ODI  | 29 BOULEVARD HAUSSMANN PARIS  | FRANCE                   | INFRFP100119       | 9718181   | 0.69 FPC |            | AABCS7484C  |
| 6                                | JUPITER INDIA FUND  | 50 Bank Street London   | UNITED KINGDOM           | INUKFP242516       | 9577693   | 0.68 FPC |            | AABTT4862E  |
| 7                                | ALTITUDE INVESTMENT FUND PCC- CELL 1  | HOTEL AVENUE 11TH FLOOR BRAMER HOUSE CYBERCITY EBENE  | MAURITIUS                | INMUF0708924       | 9325535   | 0.66 FPC |            | ABBCA0991P  |
| 8                                | MAGNA UMBRELLA FUND PLC FIERA EMERGING MARKETS FUN D  | RIVERSIDE TWO SIR JOHN ROGERSON'S QUAY GRAND CANAL DOCK DUBLIN 2  | IRELAND                  | INIRFP240216       | 5603710   | 0.40 FPC |            | AAGCM8029C  |
| 9                                | OPTIMIX WHOLESALE GLOBAL EMERGING MARKETS SHARE TRUST   | 13 347 KENT STREET SYDNEY NSW   | AUSTRALIA                | INAUFP108115       | 5031231   | 0.36 FPC |            | AAATO17748  |
| 10                               | CITIGROUP GLOBAL MARKETS MAURITIUS PRIVATE LIMITED - ODI  | 5th Floor Ebene Esplanade 24 Bank Street Cybercity Ebene  | MAURITIUS                | INMUF001220        | 3692847   | 0.26 FPC |            | AAFC53274C  |
| 11                               | THE JUPITER GLOBAL FUND-JUPITER INDIA SELECT  | 6 ROUTE DE TREVES SENNINGERBERG   | LUXEMBOURG               | INLUFP020818       | 3299671   | 0.23 FPC |            | AAGAT2743L  |
| 12                               | ABU DHABI INVESTMENT AUTHORITY - MONSOON  | 211 CORNICHE STREET PO BOX 3600 ABU DHABI   | UNITED ARAB EMIRATES     | INUEFP010817       | 2985341   | 0.21 FPC |            | AAACA4380N  |
| 13                               | EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX NON-LENDABLE FUND                            | 400 HOWARD STREET SAN FRANCISCO CA 94105  | UNITED STATES OF AMERICA | INUSFP172617       | 2732501   | 0.19 FPC |            | AAAAE3545P  |
| 14                               | OAKS EMERGING UMBRELLA FUND PLC OAKS EMERGING AND FRONTIER OPPORTUNITIES FUND                   | RIVERSIDE TWO SIR JOHN ROGERSON QUAY GRAND CANAL DOCK DUBLIN 2 NA   | IRELAND                  | INIRFP045422       | 2127430   | 0.15 FPC |            | AADCO7589G  |
| 15                               | FLORIDA RETIREMENT SYSTEM - ALLSPRING GLOBAL INVESTMENTS, LLC (EMSC)                            | 1801 HERMITAGE BLVD SUITE 100 TALLAHASSEE FLORIDA   | UNITED STATES OF AMERICA | INUSFP032923       | 1704729   | 0.12 FPC |            | AAAJF0103H  |
| 16                               | STATE STREET GLOBAL SMALL CAP EQUITY EX-U.S. INDEX NON-LENDING SERIES FUND                      | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP023316       | 1633931   | 0.12 FPC |            | AAJTS4147D  |
| 17                               | NEUBERGER BERMAN EMERGING MARKETS EQUITY FUND   | 1290 AVENUE OF THE AMERICAS NEW YORK NY   | UNITED STATES OF AMERICA | INUSFP168015       | 1628450   | 0.12 FPC |            | AABTN2403M  |
| 18                               | ISHARES MSCI INDIA SMALL-CAP ETF  | 400 HOWARD STREET SAN FRANCISCO CA 94105  | UNITED STATES OF AMERICA | INUSFP036219       | 1454565   | 0.10 FPC |            | AABT17440P  |
| 19                               | THE SAUDI SECOND INVESTMENT COMPANY   | Prince Turki Bin Abdul Al-Awal Road P.O. Box 6847 Riyadh R  | SAUDI ARABIA             | INSDFP072321       | 1447847   | 0.10 FPC |            | AAICT6627K  |
| 20                               | ISHARES CORE MSCI EM IMI UCITS ETF  | JP MORGAN 200 CAPITAL DOCK 79 SIR JOHN ROGERSONS QUAY DUBLIN  | IRELAND                  | INIRFP073415       | 1394451   | 0.10 FPC |            | AAICT7836E  |
| 21                               | THRIFT SAVINGS PLAN   | 77 K Street N.E. Suite 1000 Washington D.C  | UNITED STATES OF AMERICA | INUSFP085824       | 1353970   | 0.10 FPC |            | AAETT9941P  |
| 22                               | COLLEGE RETIREMENT EQUITIES FUND - STOCK ACCOUNT  | 730 THIRD AVENUE NEW YORK NEW YORK  | UNITED STATES OF AMERICA | INUSFP083617       | 1252468   | 0.09 FPC |            | AAACQ9040K  |
| 23                               | ELYSIAN WEALTH FUND   | IQ EQ FUND SERVICES (MAURITIUS) LTD 33 EDITH CAVELL STREET PORT LOUIS   | MAURITIUS                | INMUF005814        | 1250000   | 0.09 FPC |            | AAICS7877A  |
| 24                               | NEUBERGER BERMAN INVESTMENT FUNDS PLC/NEUBERGER BERMAN EMERGING MARKETS EQUITY FUND             | 70 Sir John Rogersons Quay Dublin 2 Ireland   | IRELAND                  | INIRFP067615       | 1227727   | 0.09 FPC |            | AAACN3716H  |
| 25                               | EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX FUND   | 400 HOWARD STREET SAN FRANCISCO CA 94105  | UNITED STATES OF AMERICA | INUSFP176217       | 1206291   | 0.09 FPC |            | AAAAE3365K  |
| 26                               | BNP PARIBAS FINANCIAL MARKETS - ODI   | 1 RUE LAFFITTE PARIS  | FRANCE                   | INIRFP006620       | 1202047   | 0.09 FPC |            | AAAGF8324G  |
| 27                               | DOVETAIL INDIA FUND CLASS 17  | 6TH FLOOR TWO TRIBECA TRIBECA CENTRAL TRIANON   | MAURITIUS                | INMUF0036722       | 1100000   | 0.08 FPC |            | AAGCD0792B  |
| 28                               | NEUBERGER BERMAN EMERGING MARKETS EQUITY TRUST  | 1290 AVENUE OF THE AMERICAS NEW YORK NY   | UNITED STATES OF AMERICA | INUSFP057418       | 959246    | 0.07 FPC |            | AACTN9187H  |
| 29                               | RESONANCE OPPORTUNITIES FUND  | SUITE 320 3RD FLOOR NG TOWER EBENE CYBERCITY  | MAURITIUS                | INMUF215716        | 920000    | 0.07 FPI |            | AAFCR4738A  |
| 30                               | SANSO LONGCHAMP ASSET MANAGEMENT - INDIA GROWTH FU ND   | 17 RUE DE SANSOLONGCHAMP ASSET MGMT CHAILLOT 75116 PARIS PARIS FRANCE   | FRANCE                   | INIRFP120324       | 625000    | 0.04 FPC |            | ABOCS5922K  |
| 31                               | INDIA OPPORTUNITIES GROWTH FUND LTD - PINEWOOD STRATEGY   | 4TH FLOOR 19 BANK STREET CYBERCITY EBENE  | MAURITIUS                | INMUF0226415       | 613343    | 0.04 FPC |            | AACTI5037L  |
| 32                               | ALBULA INVESTMENT FUND LTD  | 33 EDITH CAVELL STREET PORT LOUIS REPUBLIC OF MAURITIUS   | MAURITIUS                | INMUF062015        | 500000    | 0.04 FPC |            | AAHCA3597Q  |
| 33                               | NEXUS GLOBAL OPPORTUNITIES FUND   | C/O ANNEX MANAGEMENT SERVICES LIMITED 8TH FLOOR EBENE TOWER 52 CYBERCITY EBENE                                    | MAURITIUS                | INMUF029820        | 500000    | 0.04 FPI |            | AAGCN8704P  |
| 34                               | NORTHERN TRUST COLLECTIVE EMERGING MARKETS SMALL CAP INDEX FUND- NON LENDING                    | 50 S LaSalle Street Chicago Illinois  | UNITED STATES OF AMERICA | INUSFP095215       | 480509    | 0.03 FPC |            | AACTN1585B  |
| 35                               | BNP PARIBAS FINANCIAL MARKETS   | 20 Boulevard Des Italiens Paris   | FRANCE                   | INFRFP085515       | 477840    | 0.03 FPC |            | AAAGF85324G |
| 36                               | VIKASA INDIA EIF I FUND- SHARE CLASS P  | C/O IQ EQ FUND SERVICES (MAURITIUS) LTD 33 EDITH CAVELL STREET PORT LOUIS   | MAURITIUS                | INMUF0055123       | 442000    | 0.03 FPI |            | AAJCV6531B  |
| 37                               | CENTURY INDIA OPPORTUNITY FUND PC   | Unit OT 16-38 Level 16 Central Park Offices DIFC Dubai  | UNITED ARAB EMIRATES     | INUEFP100624       | 400000    | 0.03 FPC |            | AAAMC1280F  |
| 38                               | TSP CUSTOM EMERGING MARKETS SECURITIES LENDING FUN D  | ONE IRON STREET BOSTON BOSTON MASSACHUSETTS   | UNITED STATES OF AMERICA | INUSFP075524       | 301458    | 0.02 FPC |            | AAETT9761B  |
| 39                               | NUVAMA INDIA EDGE FUND  | Gujarat   | INDIA                    | INIGFP008124       | 299990    | 0.02 FPC |            | AAETN4036H  |
| 40                               | CALIFORNIA STATE TEACHERS RETIREMENT SYSTEM - NORTH HERN TRUST INVESTMENTS, INC.                | 100 WATERFRONT PLACE WEST SACRAMENTO CALIFORNIA CALIFORNIA  | UNITED STATES OF AMERICA | INUSFP064323       | 299730    | 0.02 FPC |            | AAAF05059D  |
| 41                               | MINERVA VENTURES FUND   | C/O ONS FISHERY LTD HOTEL AVENUE 11TH FLOOR BRAMER HOUSE EBENE CYBERCITY  | MAURITIUS                | INMUF0011123       | 295000    | 0.02 FPC |            | AAQCM6132Q  |
| 42                               | STATE STREET GLOBAL ALL CAP EQUITY EX-US INDEX PORTFOLIO  | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP143615       | 267689    | 0.02 FPC |            | AAFTS4443E  |
| 43                               | THE REGENTS OF THE UNIVERSITY OF CALIFORNIA - STATE STREET GLOBAL ADVISORS                      | 1111 BROADWAY SUITE 2100 OAKLAND CA   | UNITED STATES OF AMERICA | INUSFP242917       | 259719    | 0.02 FPC |            | AADCT1007C  |
| 44                               | TEACHER RETIREMENT SYSTEM OF TEXAS - SELF MANAGED 34  | 4655 MUELLER BLVD AUSTIN AUSTIN TEXAS   | UNITED STATES OF AMERICA | INUSFP058623       | 250819    | 0.02 FPC |            | AAATT9387R  |
| 45                               | UNITED NATIONS FOR AND ON BEHALF OF THE UNITED NATIONS JOINT STAFF PENSION FUND                 | 885 Second Avenue 30th Floor New York NY  | UNITED STATES OF AMERICA | INUSFP167315       | 219331    | 0.02 FPC |            | AAAU05022D  |
| 46                               | PUBLIC EMPLOYEES RETIREMENT SYSTEM OF OHIO  | 277 EAST TOWN STREET COLUMBUS OH 43215 USA  | UNITED STATES OF AMERICA | INUSFP130016       | 216437    | 0.02 FPC |            | AAATP5186E  |
| 47                               | NECTA BLOOM VCC - REGAL FUND  | #19-96 8 EU TONG SEN STREET THE CENTRAL SINGAPORE   | SINGAPORE                | INSGFP073524       | 200000    | 0.01 FPC |            | AAJCN7494H  |
| 48                               | BOFA SECURITIES EUROPE SA - ODI   | 51 rue La Boetie Paris  | FRANCE                   | INFRFP097319       | 171209    | 0.01 FPC |            | AAICB3737G  |
| 49                               | ISHARES MSCI EM SMALL CAP UCITS ETF   | JP MORGAN 200 CAPITAL DOCK 79 SIR JOHN ROGERSONS QUAY DUBLIN 2  | IRELAND                  | INIRFP257116       | 161094    | 0.01 FPC |            | AAADI3486J  |
| 50                               | SSGA SPDR ETFS EUROPE I PUBLIC LIMITED COMPANY - SPDR MSCI EMERGING MARKETS SMALL CAP UCITS ETF | 78 SIR JOHN ROGERSONS QUAY DUBLIN 2   | IRELAND                  | INIRFP026114       | 160000    | 0.01 FPC |            | AAUCS9527P  |
| 51                               | LEGAL & GENERAL EMERGING MARKETS EX CHINA SMALL CAP COLLECTIVE INVESTMENT TRUST FUND            | 201 7 17th Street NW Suite 1000 Atlanta Georgia   | UNITED STATES OF AMERICA | INUSFP011824       | 152176    | 0.01 FPC |            | AAACT14748C |
| 52                               | ISHARES IV PUBLIC LIMITED COMPANY- ISHARES MSCI EM IMI ESG SCREENED UCITS ETF                   | JP MORGAN 200 CAPITAL DOCK 79 SIR JOHN ROGERSONS QUAY DUBLIN  | IRELAND                  | INIRFP068018       | 151448    | 0.01 FPC |            | AAFCI0124F  |
| 53                               | VARANIAM INDIA OPPORTUNITY LTD  | C/O IQ EQ Fund Services (Mauritius) Ltd Edith Cavell Street Port Louis  | MAURITIUS                | INMUF067814        | 150000    | 0.01 FPC |            | AAFCP1017J  |
| 54                               | SALTORO ALPHA LP  | PO Box 309 Uigland House South Church Street George Town Grand Cayman   | CAYMAN ISLANDS           | INCYFP108824       | 140000    | 0.01 FPC |            | ACAKS8828D  |
| 55                               | SPDR S&P EMERGING MARKETS SMALL CAP ETF   | ONE LINCOLN STREET BOSTON MA  | UNITED STATES OF AMERICA | INUSFP131616       | 128382    | 0.01 FPC |            | AAHTS4805N  |
| 56                               | ISHARES CORE MSCI EMERGING MARKETS IMI INDEX ETF  | 161 BAY STREET SUITE 2500 P.O. BOX 614 TORONTO ONTARIO  | CANADA                   | INCAFP112522       | 111059    | 0.01 FPC |            | AACTI0942D  |
| 57                               | MAYBANK SECURITIES PTE LTD  | 50 NORTH CANAL ROAD 03-01   | SINGAPORE                | INSGFP008417       | 102500    | 0.01 FPC |            | AAKCM4011C  |
| 58                               | ASTORNE CAPITAL VCC - ARVEN   | #19-96 The Central 8 EU Tong Sen Street SINGAPORE SINGAPORE   | SINGAPORE                | INSGFP045823       | 100000    | 0.01 FPC |            | AAZCA1579J  |
| 59                               | M7 GLOBAL FUND PCC - CELL DEWCAP FUND   | Level 5 Maeva Tower Bank Street Cybercity Ebene   | MAURITIUS                | INMUF0048421       | 100000    | 0.01 FPC |            | AAABC27699E |
| 60                               | NEUBERGER BERMAN STRATEGIC INDIA EQUITY MASTER FUND L.P.  | CAYMAN  | CAYMAN ISLANDS           | INCYFP077221       | 98495     | 0.01 FPC |            | AAHAN0641E  |
| 61                               | UNIVERSAL GOLDEN FUND   | SUITE 305 3RD FLOOR NG TOWER EBENE CYBERCITY  | MAURITIUS                | INMUF0053514       | 92000     | 0.01 FPC |            | AABCU7332H  |
| 62                               | M7 GLOBAL FUND PCC - ASAS GLOBAL OPPORTUNITIES FUND   | C/O TRI-PRO ADMINISTRATORS LTD LEVEL 5 MAEVA TOWER BANK STREET CYBERCITY EBENE                                    | MAURITIUS                | INMUF0018224       | 88000     | 0.01 FPC |            | AAACC23526B |
| 63                               | MERCER QIF FUND PLC-MERCER INVESTMENT FUND 1  | 70 SIR JOHN ROGERSON'S QUAY DUBLIN 2  | IRELAND                  | INIRFP033015       | 71391     | 0.01 FPC |            | AAJCN5945N  |
| 64                               | EMERGING MARKETS SMALL CAPITALIZATION EQUITY INDEX FUND B                                       | 400 HOWARD STREET SAN FRANCISCO CA 94105  | UNITED STATES OF AMERICA | INUSFP172517       | 69092     | 0.00 FPC |            | AAAAE3543M  |
| 65                               | STATE STREET MSCI EMERGING MARKETS SMALL CAP INDEX SECURITIES LENDING FUND                      | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP022916       | 68493     | 0.00 FPC |            | AAHTS6002P  |
| 66                               | STATE STREET MSCI EMERGING MARKETS SMALL CAP INDEX NON-LENDING COMMON TRUST FUND                | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP022816       | 67044     | 0.00 FPC |            | AAITS0342K  |
| 67                               | CITRINE FUND LIMITED  | 4TH FLOOR RAFFLES TOWER 19 CYBERCITY EBENE  | MAURITIUS                | INMUF101215        | 65000     | 0.00 FPC |            | AAFCQ9596B  |
| 68                               | SPDR S&P EMERGING ASIA PACIFIC ETF  | STATE STREET FINANCIAL CENTER ONE LINCOLN STREET BOSTON MA  | UNITED STATES OF AMERICA | INUSFP131516       | 57067     | 0.00 FPC |            | AAAGT54583E |
| 69                               | NEUBERGER BERMAN EUROPE HOLDINGS LLC  | 1290 AVENUE OF THE AMERICAS NEW YORK NY   | UNITED STATES OF AMERICA | INUSFP005621       | 55215     | 0.00 FPC |            | AAHCH4045J  |
| 70                               | FLEXSHARES MORNINGSTAR EMERGING MARKETS FACTOR TILT INDEX FUND                                  | 50 S LASALLE STREET CHICAGO IL  | UNITED STATES OF AMERICA | INUSFP242515       | 50008     | 0.00 FPC |            | AAATF4143K  |
| 71                               | STATE STREET MSCI ACWI EX USA IMI SCREENED NON-LENDING COMMON TRUST FUND                        | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP234015       | 46890     | 0.00 FPC |            | AAPTS8365R  |
| 72                               | AMERICAN CENTURY ETF TRUST - AVANTIS EMERGING MARKETS EQUITY FUND                               | 4500 MAIN STREET KANSAS CITY MISSOURI   | UNITED STATES OF AMERICA | INUSFP004020       | 31227     | 0.00 FPC |            | AAHTA6005C  |
| 73                               | SPARTAN GROUP TRUST FOR EMPLOYEE BENEFIT PLANS SPARTAN TOTAL INTERNATIONAL INDEX POOL           | 100 SUMMER STREET 12th FLOOR BOSTON MA  | UNITED STATES OF AMERICA | INUSFP031720       | 28504     | 0.00 FPC |            | AAJTS7736D  |
| 74                               | RIGEL GLOBAL FUND   | Port Louis Mauritius  | MAURITIUS                | INMUF0093021       | 20000     | 0.00 FPC |            | AAJCN4931P  |
| 75                               | ABUNDANTIA CAPITAL VCC- ABUNDANTIA CAPITAL III  | #19-96 8 EU TONG SEN STREET THE CENTRAL SINGAPORE   | SINGAPORE                | INSGFP041724       | 13259     | 0.00 FPC |            | ABACA6421H  |
| 76                               | SAINT CAPITAL FUND  | C/o Tri-Pro Administrators Ltd Level 5 Maeva Tower Bank Street Cybercity Ebene                                    | MAURITIUS                | INMUF0073718       | 10000     | 0.00 FPC |            | ABBCS0999P  |
| 77                               | COPTHALL MAURITIUS INVESTMENT LIMITED - ODI ACCOUNT   | C/O IQ EQ CORPORATE SERVICES (MAURITIUS) LTD 33 EDITH CAVELL STREET PORT LOUIS                                    | MAURITIUS                | INMUF0001717       | 9508      | 0.00 FPC |            | AAACC4303M  |
| 78                               | TRANS EXT GLOBAL EMRG MKTS  | 1000 RED RIVER STREET AUSTIN TEXAS  | UNITED STATES OF AMERICA | INUSFP188517       | 5465      | 0.00 FPC |            | AAATT9387R  |
| 79                               | SPDR PORTFOLIO MSCI GLOBAL STOCK MARKET ETF   | ONE IRON STREET BOSTON MA   | UNITED STATES OF AMERICA | INUSFP069815       | 4547      | 0.00 FPC |            | AAATS2583F  |
| 80                               | TEACHER RETIREMENT SYSTEM OF TEXAS- SELF MANAGED 4 0  | 4655 MUELLER BLVD AUSTIN AUSTIN TEXAS   | UNITED STATES OF AMERICA | INUSFP058023       | 2250      | 0.00 FPC |            | AAATT9387R  |
| 81                               | AMERICAN CENTURY ICAP - AVANTIS EMERGING MARKETS EQUITY UCITS ETF                               | 7TH FLOOR BLOCK A ONE PARK PLACE UPPER HATCH STREET DUBLIN 2  | IRELAND                  | INIRFP135224       | 1513      | 0.00 FPC |            | ABBCA7900N  |
| 82                               | COPTHALL MAURITIUS INVESTMENT LIMITED - NON ODI ACCOUNT   | C/O IQ EQ CORPORATE SERVICES (MAURITIUS) LTD 33 EDITH CAVELL STREET PORT LOUIS                                    | MAURITIUS                | INMUF0086419       | 8         | 0.00 FPC |            | AAACC4303M  |
| TOTAL:                           |   |   |                          |                    | 167342462 | 11.84    |            |             |

| Date of registration of transfer (Date Month Year) | Type of transfer | Class of shares transferred | Number of Shares/Debentures/Units Transferred | Amount per Share/Debenture/Unit (in Rs.) | Ledger Folio of Transferor | Transferor's Name             | Ledger Folio of Transferee | Transferee's Name (Surname, middle name, first name) |
|--|------------------|-----------------------------|---|--|----------------------------|-------------------------------|----------------------------|--|
| 15/05/2024   | Equity share     | Equity Shares               | 400   | 10                                       | MLL002451                  | MEERA LACHMANDAS KHANCHANDANI | MLL053011                  | SUNIL LACHMANDAS KHANCHANDANI                        |
| 15/05/2024   | Equity share     | Equity Shares               | 100   | 10                                       | MLL001020                  | ABHA AGGARWAL                 | MLL053015                  | RAMESH KUMAR AGGARWAL                                |
| 15/05/2024   | Equity share     | Equity Shares               | 400   | 10                                       | MLL026891                  | MANAV KEJRIWAL                | MLL053016                  | AJAY KEJRIWAL Executor of the Estate of the Deased   |
| 15/05/2024   | Equity share     | Equity Shares               | 200   | 10                                       | MLL029930                  | VIJAY POPATLAL VORA           | MLL053017                  | HARSHAL VIJAY VORA                                   |
| 25/05/2024   | Equity share     | Equity Shares               | 200   | 10                                       | MLL024268                  | PULAVARTHY HARSHA             | MLL053014                  | BOMMAKANTI HARSHASRI                                 |
| 18/09/2024   | Equity share     | Equity Shares               | 500   | 10                                       | MLL031145                  | PUSHPA SISHODIYA              | MLL053022                  | PRAHLAD KUMAR SISHODIYA                              |
| 10/04/2024   | Equity share     | Equity Shares               | 600   | 10                                       | MLL014596                  | BUDDHARDEV GUHA               | MLL053110                  | MALENI B GUHA  |
| 10/04/2024   | Equity share     | Equity Shares               | 700   | 10                                       | MLL011945                  | SHABBIR BALECHAND PATWEGAR    | MLL053111                  | SHAMSHAD SHABBIR PATWEGAR                            |
| 10/04/2024   | Equity share     | Equity Shares               | 200   | 10                                       | MLL016684                  | KALIKANT MISHRA               | MLL053112                  | KALPANA MISHRA                                       |
| 29/10/2024   | Equity share     | Equity Shares               | 200   | 10                                       | MLL003602                  | SULOCHANA N PAREKH            | MLL053114                  | JAYKUMAR NAGINDAS PAREKH                             |
| 11/06/2024   | Equity share     | Equity Shares               | 400   | 10                                       | MLL023355                  | PUSHPA MALHOTRA               | MLL053113                  | PARVEEN KUMAR MALHOTRA                               |
| 29/11/2024   | Equity share     | Equity Shares               | 200   | 10                                       | MLL011140                  | SHA JESHTMAL GALBAJI          | MLL053115                  | DAXA KISHORKUMAR OSWAL                               |
| 31/01/2025   | Equity share     | Equity Shares               | 600   | 10                                       | MLL039793                  | SHUBHALAXMI B RAHALKAR        | MLL053116                  | BEENA B RAHALKAR                                     |

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