

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

Register of contracts with related party and contracts and Bodies etc. in which directors are interested

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                             |                           |                               | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---------------------------------|--|---|--|--|---|-----------------------------|---------------------------|-------------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |                                 |  |   |  |  | No. of Directors present in the meeting | Director s voting in favour | Director s voting against | Director s remaini ng neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)                             | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                         | (10)                      | (11)                          | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 30.01.2019-19.04.2019          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI    | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 2                                       | 1                           | -                         | -                             | 20.04.2019  | 188(1)(d)   | 13,02,00,000                      | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 30.01.2019-19.04.2019          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI    | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 2                                       | 1                           | -                         | -                             | 20.04.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 30.01.2019-19.04.2019          | Four Dimensions Securities (India) Limited            | -                               | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 2                                       | 2                           | -                         | -                             | 20.04.2019  | 188(1)(d)   | 3,60,00,000                       | 27.09.2018                            | -   |

|                       |   |   |                    |   |     |   |   |   |   |   |            |           |             |            |  |
|-----------------------|---|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|-------------|------------|--|
| 30.01.2019-19.04.2019 | Winro Commercial (India) Limited                | BABITA THAKAR KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 1 |   |   | 20.04.2019 | 188(1)(d) | 1,00,00,000 | 27.09.2018 | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 30.01.2019-19.04.2019 | Winro Commercial (India) Limited                | BABITA THAKAR KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY      | Availing revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12%  | Yes | - | 2 | 1 |   |   | 20.04.2019 | 188(1)(d) | 1,00,00,000 | 27.09.2018 | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 30.01.2019-19.04.2019 | Urudavan Investment and Trading Private Limited | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | -           | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | Geecee Holdings LLP                             | -   | -                  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | -           | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | GTZ(Bombay Pvt Ltd)                             | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | -           | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | Samjagdeep Investments Pvt Ltd                  | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | 1,00,000    | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | Arkaya Commercial Private Limited               | -   | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | -           | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | Arcies Laboratories limited                     | -   | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | 50,000      | 27.09.2018 | -  |
| 30.01.2019-19.04.2019 | Four Dimensions Securities (India) Limited      | -   | GROUP COMPANY      | Availing Brokerage Services -<br>Brokerage Paid   | Yes | - | 2 | 2 | - | - | 20.04.2019 | 188(1)(d) | -           | 27.09.2018 | -  |

**SIGNATURE OF DIRECTORS:**

SD/-  
SANDEEP KEJARIWAL

SD/- SURESHKUMAR V.V.

SD/-  
KETAN DESAI

SD/- ZAVERI RITESH

SD/-  
AVANI SANGHAVI  
(Company Secretary & Compliance  
Officer)

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

**Register of contracts with related party and contracts and Bodies etc. in which directors are interested**

**[Pursuant to section 189(1) and rule 16(1)]**

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub- section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director                                  | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                             |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any  |
|--------------------------------|---|--|--|---|--|--|---|-----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|--|
|                                |   |  |  |   |  |  | No. of Directors present in the meeting | Director s voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |  |
| (1)                            | (2)   | (3)  | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                         | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)   |
| 20.04.2019-28.05.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI                                  | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 1                           | -                        | -                           | 29.05.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                                    |
| 20.04.2019-28.05.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI                                  | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 1                           | -                        | -                           | 29.05.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                                    |
| 20.04.2019-28.05.2019          | Four Dimensions Securities (India) Limited            | -  | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                           | -                        | -                           | 29.05.2019  | 188(1)(d)   | 11,00,000                         | 27.09.2018                            | -  |
| 20.04.2019-28.05.2019          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 3                           | -                        | -                           | 29.05.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |

|                       |                                  |  |               |  |     |   |   |   |   |   |            |           |          |            |  |
|-----------------------|----------------------------------|--|---------------|--|-----|---|---|---|---|---|------------|-----------|----------|------------|--|
| 20.04.2019-28.05.2019 | Winro Commercial (India) Limited | BABITA THAKAR<br>KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | 3,00,000 | 27.09.2018 | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
|-----------------------|----------------------------------|--|---------------|--|-----|---|---|---|---|---|------------|-----------|----------|------------|--|

|                       |   |   |                    |   |     |   |   |   |   |   |            |           |   |            |   |
|-----------------------|---|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|---|------------|---|
| 20.04.2019-28.05.2019 | Urudavan Investment and Trading Private Limited | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | Geecee Holdings LLP                             | - | -                  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | GTZ(Bombay Pvt Ltd)                             | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | Samjagdeep Investments Pvt Ltd                  | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | Arkaya Commercial Private Limited               | - | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | Arcies Laboratories limited                     | - | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 20.04.2019-28.05.2019 | Four Dimensions Securities (India) Limited      | - | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid  | Yes | - | 4 | 4 | - | - | 29.05.2019 | 188(1)(d) | - | 27.09.2018 | - |

**SIGNATURE OF DIRECTORS:**

SD/-  
SANDEEP KEJARIWAL

SD/-  
SURESHKUMAR

V.V.

SD/-  
KETAN DESAI

SD/-  
RITESH ZAVERI

SD/-  
AVANI SANGHAVI  
(Company Secretary & Compliance  
Officer)

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

**Register of contracts with related party and contracts and Bodies etc. in which directors are interested**

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director                                  | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                             |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any  |
|--------------------------------|---|--|--|---|--|--|---|-----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|--|
|                                |   |  |  |   |  |  | No. of Directors present in the meeting | Director's voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |  |
| (1)                            | (2)   | (3)  | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                         | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)   |
| 29.05.2019-12.08.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI                                  | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 5                                       | 2                           | -                        | -                           | 13.08.2019  | 188(1)(d)   | 2,34,00,000                       | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                                    |
| 29.05.2019-12.08.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI                                  | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 5                                       | 2                           | -                        | -                           | 13.08.2019  | 188(1)(d)   | 2,52,50,000                       | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                                    |
| 29.05.2019-12.08.2019          | Four Dimensions Securities (India) Limited            | -  | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 5                                       | 5                           | -                        | -                           | 13.08.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | -  |
| 29.05.2019-12.08.2019          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 5                                       | 3                           | -                        | -                           | 13.08.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |



|                       |   |  |                    |   |     |   |   |   |   |   |            |           |          |            |  |
|-----------------------|---|--|--------------------|---|-----|---|---|---|---|---|------------|-----------|----------|------------|--|
| 29.05.2019-12.08.2019 | Winro Commercial (India) Limited                | BABITA THAKAR<br>KETAN DESAI<br>V.V.SURESHKUMAR<br>RITESH ZAVERI | GROUP COMPANY      | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes | - | 5 | 3 | - | - | 13.08.2019 | 188(1)(d) | 9,00,000 | 27.09.2018 | MRS. BABITA THAKAR, MR. KETAN DESAI, MR. V.V.SURESHKUMAR, MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 29.05.2019-12.08.2019 | Urudavan Investment and Trading Private Limited | -  | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | Geecee Holdings LLP                             | -  | -                  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | GTZ(Bombay Pvt Ltd)                             | -  | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | Samjagdeep Investments Pvt Ltd                  | -  | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | Arkaya Commercial Private Limited               | -  | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | Arcies Laboratories limited                     | -  | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |
| 29.05.2019-12.08.2019 | Four Dimensions Securities (India) Limited      | -  | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid  | Yes | - | 5 | 5 | - | - | 13.08.2019 | 188(1)(d) | -        | 27.09.2018 | -  |

**SIGNATURE OF DIRECTORS:**

**SD/-  
BABITA THAKAR**

**SD/-  
SANDEEP KEJARIWAL**

**SD/-  
V.V. SURESHKUMAR**

**SD/-  
KETAN DESAI**

**SD/-  
RITESH ZAVERI**

**SD/-  
AVANI SANGHAVI  
(Company Secretary & Compliance  
Officer)**

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

Register of contracts with related party and contracts and Bodies etc. in which directors are interested

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director               | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                            |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---|--|---|--|--|---|----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |   |  |   |  |  | No. of Directors present in the meeting | Directors voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)   | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                        | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 13.08.2019-13.09.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 14.09.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 13.08.2019-13.09.2019          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 14.09.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 13.08.2019-13.09.2019          | Four Dimensions Securities (India) Limited            | -   | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 14.09.2019  | 188(1)(d)   | -                                 | 27.09.2018                            |   |
| 13.08.2019-13.09.2019          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 14.09.2019  | 188(1)(d)   | -                                 | 27.09.2018                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 13.08.2019-13.09.2019          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 14.09.2019  | 188(1)(d)   | 4,00,000                          | 27.09.2018                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |

|                       |   |   |                    |  |     |   |   |   |   |   |            |           |   |            |   |
|-----------------------|---|---|--------------------|--|-----|---|---|---|---|---|------------|-----------|---|------------|---|
| 13.08.2019-13.09.2019 | Urudavan Investment and Trading Private Limited | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | Geecee Holdings LLP                             | - | -                  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | GTZ(Bombay Pvt Ltd)                             | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | Samjagdeep Investments Pvt Ltd                  | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | Arkaya Commercial Private Limited               | - | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | Arcies Laboratories limited                     | - | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |
| 13.08.2019-13.09.2019 | Four Dimensions Securities (India) Limited      | - | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid   | Yes | - | 4 | 4 | - | - | 14.09.2019 | 188(1)(d) | - | 27.09.2018 | - |

**SIGNATURE OF DIRECTORS:**

SD/- **BABITA THAKAR**

SD/- **SANDEEP KEJARIWAL**

SD/- **KETAN DESAI**

SD/- **RITESH ZAVERI**

SD/-  
AVANI SANGHAVI  
(Company Secretary & Compliance  
Officer)

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

Register of contracts with related party and contracts and Bodies etc. in which directors are interested

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub- section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director         | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                             |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---|--|---|--|--|---|-----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |   |  |   |  |  | No. of Directors present in the meeting | Director s voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)                                     | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                         | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 14.09.2019-11.12.2019          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI            | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                           | -                        | -                           | 12.12.2019  | 188(1)(d)   | 14,00,000                         | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 14.09.2019-11.12.2019          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI            | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                           | -                        | -                           | 12.12.2019  | 188(1)(d)   | 9,08,00,000                       | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 14.09.2019-11.12.2019          | Four Dimensions Securities (India) Limited            | -                                       | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                           | -                        | -                           | 12.12.2019  | 188(1)(d)   | 2,18,00,000                       | 26.09.2019                            | -   |
| 14.09.2019-11.12.2019          | Winro Commercial (India) Limited                      | BABITA THAKAR KETAN DESAI RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                           | -                        | -                           | 12.12.2019  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |

|                       |   |   |                    |   |     |   |   |   |   |   |            |           |           |            |   |
|-----------------------|---|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|-----------|------------|---|
| 14.09.2019-11.12.2019 | Winro Commercial (India) Limited                | BABITA THAKAR KETAN DESAI RITESH ZAVERI | GROUP COMPANY      | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes | - | 4 | 2 | - | - | 12.12.2019 | 188(1)(d) | 85,90,000 | 26.09.2019 | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 14.09.2019-11.12.2019 | Urudavan Investment and Trading Private Limited | -                                       | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | Geecee Holdings LLP                             | -                                       | -                  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | GTZ(Bombay Pvt Ltd)                             | -                                       | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | Samjagdeep Investments Pvt Ltd                  | -                                       | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | Arkaya Commercial Private Limited               | -                                       | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | Arcies Laboratories limited                     | -                                       | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |
| 14.09.2019-11.12.2019 | Four Dimensions Securities (India) Limited      | -                                       | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid  | Yes | - | 4 | 4 | - | - | 12.12.2019 | 188(1)(d) | -         | 26.09.2019 | -   |

**SIGNATURE OF DIRECTORS:**

SD/- THAKAR BABITA

SD/- SANDEEP KEJARIWAL

SD/- DESAI KETAN

SD/- RITESH ZAVERI

SD/-AVANI SANGHAVI  
(Company Secretary & Compliance Officer)





**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

**Register of contracts with related party and contracts and Bodies etc. in which directors are interested**

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director               | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions  | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                            |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---|--|---|--|--|---|----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |   |  |   |  |  | No. of Directors present in the meeting | Directors voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)   | (4)  | (5)   | (6)  | (7)  | (8)                                     | (9)                        | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 12.12.2019-11.02.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 12.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 12.12.2019-11.02.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 12.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 12.12.2019-11.02.2020          | Four Dimensions Securities (India) Limited            | -   | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 12.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            |   |
| 12.12.2019-11.02.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          |                          |                             | 12.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 12.12.2019-11.02.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          |                          |                             | 12.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |

|                       |   |   |                    |   |     |   |   |   |   |   |            |           |   |            |   |
|-----------------------|---|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|---|------------|---|
| 12.12.2019-11.02.2020 | Urudavan Investment and Trading Private Limited | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | Geecee Holdings LLP                             | - | -                  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | GTZ(Bombay Pvt Ltd)                             | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | Samjagdeep Investments Pvt Ltd                  | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | Arkaya Commercial Private Limited               | - | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | Arcies Laboratories limited                     | - | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 12.12.2019-11.02.2020 | Four Dimensions Securities (India) Limited      | - | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid  | Yes | - | 4 | 4 | - | - | 12.02.2020 | 188(1)(d) | - | 26.09.2019 | - |

**SIGNATURE OF DIRECTORS:**

SD/-  
BABITA THAKAR

SD/-  
SANDEEP KEJARIWAL

SD/-  
KETAN DESAI

SD/-  
RITESH ZAVERI

**SD/-AVANI SANGHAVI**  
**(Company Secretary & Compliance Officer)**

**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

Register of contracts with related party and contracts and Bodies etc. in which directors are interested

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions   | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                            |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---------------------------------|--|--|--|--|---|----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |                                 |  |  |  |  | No. of Directors present in the meeting | Directors voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)                             | (4)  | (5)  | (6)  | (7)  | (8)                                     | (9)                        | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 12.02.2020-25.02.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 26.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 12.02.2020-25.02.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI | GROUP COMPANY  | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%     | Yes  | -  | 4                                       | 2                          | -                        | -                           | 26.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 12.02.2020-25.02.2020          | Four Dimensions Securities (India) Limited            | -                               | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 26.02.2020  | 188(1)(d)   | -                                 | 26.09.2019                            |   |

|                       |                                  |   |               |   |     |   |   |   |  |  |            |           |   |            |   |
|-----------------------|----------------------------------|---|---------------|---|-----|---|---|---|--|--|------------|-----------|---|------------|---|
| 12.02.2020-25.02.2020 | Winro Commercial (India) Limited | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY | Rendering revolving loan facility (floating interest rate)<br>Indicative base price-<br>Between 9-12% | Yes | - | 4 | 2 |  |  | 26.02.2020 | 188(1)(d) | - | 26.09.2019 | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
|-----------------------|----------------------------------|---|---------------|---|-----|---|---|---|--|--|------------|-----------|---|------------|---|

|                       |   |   |                    |   |     |   |   |   |   |   |            |           |             |            |   |
|-----------------------|---|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|-------------|------------|---|
| 12.02.2020-25.02.2020 | Winro Commercial (India) Limited                | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY      | Availing revolving loan facility (floating interest rate) Indicative base price- Between 9-12%  | Yes | - | 4 | 2 |   |   | 26.02.2020 | 188(1)(d) | 3,78,00,000 | 26.09.2019 | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 12.02.2020-25.02.2020 | Urudavan Investment and Trading Private Limited | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |
| 12.02.2020-25.02.2020 | Geecee Holdings LLP                             | -   | -                  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |
| 12.02.2020-25.02.2020 | GTZ(Bombay Pvt Ltd)                             | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |
| 12.02.2020-25.02.2020 | Samjagdeep Investments Pvt Ltd                  | -   | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |
| 12.02.2020-25.02.2020 | Arkaya Commercial Private Lintied               | -   | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |
| 12.02.2020-25.02.2020 | Arcies Laboratories limited                     | -   | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 26.02.2020 | 188(1)(d) | -           | 26.09.2019 | -   |





**SARASWATI COMMERCIAL (INDIA) LIMITED**

Form MBP - 4

Register of contracts with related party and contracts and Bodies etc. in which directors are interested

[Pursuant to section 189(1) and rule 16(1)]

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director               | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions   | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                            |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items – (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---|--|--|--|--|---|----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |   |  |  |  |  | No. of Directors present in the meeting | Directors voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)   | (4)  | (5)  | (6)  | (7)  | (8)                                     | (9)                        | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 26.02.2020-26.03.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 26.02.2020-26.03.2020          | Singularity Holdings Limited                          | RITESH ZAVERI<br>VAISHALI DHURI               | GROUP COMPANY  | Availing revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | 77,00,000                         | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 26.02.2020-26.03.2020          | Four Dimensions Securities (India) Limited            | -   | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | 2,84,00,000                       | 26.09.2019                            | -   |
| 26.02.2020-26.03.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 26.02.2020-26.03.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR<br>KETAN DESAI<br>RITESH ZAVERI | GROUP COMPANY  | Availing revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | 1,41,10,000                       | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 26.02.2020-26.03.2020          | Urudavan Investment and Trading Private Limited       | -   | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 27.03.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | -   |

|                       |  |   |                    |  |     |   |   |   |   |   |            |           |   |            |   |
|-----------------------|--|---|--------------------|--|-----|---|---|---|---|---|------------|-----------|---|------------|---|
| 26.02.2020-26.03.2020 | Geecee Holdings LLP                        | - | -                  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 26.02.2020-26.03.2020 | GTZ(Bombay Pvt Ltd)                        | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 26.02.2020-26.03.2020 | Samjagdeep Investments Pvt Ltd             | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 26.02.2020-26.03.2020 | Arkaya Commercial Private Limited          | - | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 26.02.2020-26.03.2020 | Arcies Laboratories limited                | - | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 26.02.2020-26.03.2020 | Four Dimensions Securities (India) Limited | - | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid   | Yes | - | 4 | 4 | - | - | 27.03.2020 | 188(1)(d) | - | 26.09.2019 | - |

**SIGNATURE OF DIRECTORS:**

SD/-  
BABITA THAKAR

SD/-  
SANDEEP KEJARIWAL

SD/-  
KETAN DESAI

SD/-  
RITESH ZAVERI

SD/-AVANI SANGHAVI  
(Company Secretary & Compliance Officer)

**SARASWATI COMMERCIAL (INDIA) LIMITED**  
**Form MBP - 4**  
**Register of contracts with related party and contracts and Bodies etc. in which directors are interested**  
**[Pursuant to section 189(1) and rule 16(1)]**

**A. Contracts or agreements with any related party under section 188 or in which any director is concerned or interested under sub-section (2) of section 184**

| Date of contract / arrangement | Name of the party with which contract is entered into | Name of the interested director         | Relation with director/ company/ Nature of concern or interest | Principal terms and conditions   | Whether the transaction is at arm's length basis | Date of approval at the meeting of the Board | Details of voting on such resolution    |                            |                          |                             | Date of the next meeting at which register was placed for signature | Reference of specific items - (a) to (g) under sub-section (1) of section 188 | Amount of contract or arrangement | Date of share holders approval if any | Remarks, if any   |
|--------------------------------|---|---|--|--|--|--|---|----------------------------|--------------------------|-----------------------------|---|---|-----------------------------------|---------------------------------------|---|
|                                |   |   |  |  |  |  | No. of Directors present in the meeting | Directors voting in favour | Directors voting against | Directors remaining neutral |   |   |                                   |                                       |   |
| (1)                            | (2)   | (3)                                     | (4)  | (5)  | (6)  | (7)  | (8)                                     | (9)                        | (10)                     | (11)                        | (12)  | (13)  | (14)                              | (15)                                  | (16)  |
| 27.03.2020-21.07.2020          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI            | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 27.03.2020-21.07.2020          | Singularity Holdings Limited                          | RITESH ZAVERI VAISHALI DHURI            | GROUP COMPANY  | Availing revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. RITESH ZAVERI AND MRS. VAISHALI DHURI BEING INTERESTED DIRECTOR DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION                           |
| 27.03.2020-21.07.2020          | Four Dimensions Securities (India) Limited            | -                                       | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | 14,76,50,000                      | 26.09.2019                            | -   |
| 27.03.2020-21.07.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR KETAN DESAI RITESH ZAVERI | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 2                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 27.03.2020-21.07.2020          | Winro Commercial (India) Limited                      | BABITA THAKAR KETAN DESAI RITESH ZAVERI | GROUP COMPANY  | Availing revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12%  | Yes  | -  | 4                                       | 2                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | MR. KETAN DESAI AND MRS BABITA THAKAR BEING, AND MR. RITESH ZAVERI BEING INTERESTED DIRECTORS DID NOT PARTICIPATE OR VOTE FOR THIS RESOLUTION |
| 27.03.2020-21.07.2020          | Urudavan Investment and Trading Private Limited       | -                                       | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | -   |
| 27.03.2020-21.07.2020          | Geecee Holdings LLP                                   | -                                       | -  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | -   |
| 27.03.2020-21.07.2020          | GTZ(Bombay Pvt Ltd)                                   | -                                       | GROUP COMPANY  | Rendering revolving loan facility (floating interest rate)<br>Indicative base price- Between 9-12% | Yes  | -  | 4                                       | 4                          | -                        | -                           | 22.07.2020  | 188(1)(d)   | -                                 | 26.09.2019                            | -   |

|                       |  |   |                    |   |     |   |   |   |   |   |            |           |   |            |   |
|-----------------------|--|---|--------------------|---|-----|---|---|---|---|---|------------|-----------|---|------------|---|
| 27.03.2020-21.07.2020 | Samjagdeep Investments Pvt Ltd             | - | GROUP COMPANY      | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 22.07.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 27.03.2020-21.07.2020 | Arkaya Commercial Private Limited          | - | SUBSIDIARY COMPANY | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 22.07.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 27.03.2020-21.07.2020 | Arcies Laboratories limited                | - | ASSOCIATE COMPANY  | Rendering revolving loan facility (floating interest rate) Indicative base price- Between 9-12% | Yes | - | 4 | 4 |   |   | 22.07.2020 | 188(1)(d) | - | 26.09.2019 | - |
| 27.03.2020-21.07.2020 | Four Dimensions Securities (India) Limited | - | GROUP COMPANY      | Availing Brokerage Services - Brokerage Paid  | Yes | - | 4 | 4 | - | - | 22.07.2020 | 188(1)(d) | - | 26.09.2019 | - |

**SIGNATURE OF DIRECTORS:**

SD/- BABITA THAKAR

SD/- SANDEEP KEJARIWAL

SD/- KETAN DESAI

SD/- RITESH ZAVERI

SD/-AVANI SANGHAVI  
(Company Secretary & Compliance Officer)