



Date: 9<sup>th</sup> February, 2026

To,

**The Board of Directors,  
Happy Steels Limited**  
Kanganwal road, Jaspal Banger, Ludhiana  
Punjab, India -141 122

**Share India Capital Services Private Limited**  
A-25, Sector-64, Noida-201301, Uttar Pradesh, India

**Master Capital Services Limited**  
Master Chambers, S.C.O. 19, Feroze Gandhi Market, Ludhiana-141001

(Share India Capital Services Private Limited and Master Capital Services Limited any other Book Running Lead Managers which may be appointed in relation to the Offer are collectively referred to as the "Book Running Lead Managers" or "BRLMS" in relation to the Offer)

Re: Proposed initial public offering of equity shares of face value of ₹ 10 each (the "Equity Shares") of Happy Steels Limited (the "Company") comprising a fresh issue of the Equity Shares of the Company ("Fresh Issue")

Dear Sir/Ma'am,

We, K V Bindra & Associates are independent practicing Company Secretaries in whole time practice, holding a valid certificate of practice bearing peer review number 2522/2022 and certificate of practice number 12962 issued by the Peer Review Board of the Institute of Company Secretaries in India, within the meaning of the provisions of the Companies Act, 2013 and rules framed thereunder, as amended read with Company Secretaries Act, 1980, as amended, and any rules or regulations framed thereunder this report and is attached herewith as **Annexure A**.

We understand that the Company proposes to undertake an initial public offering of its Equity Shares. In connection with the Offer, the Company is required to file red herring prospectus, and prospectus (collectively, the "Offer Documents") with the Securities and Exchange Board of India ("SEBI"), Registrar of Companies, Chandigarh at Chandigarh ("ROC"), and other regulatory / statutory authorities, as may be applicable, prepared in accordance with the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, the Companies Act, 1956 ("Companies Act, 1956"), the Companies Act, 2013 and the rules made thereunder, each as amended, ("Companies Act") and other applicable laws, on the basis of due diligence of its various corporate records.





However, the Company is unable to trace corporate records for information that may be included in the Offer Documents.

We are appointed to conduct a search (physical and online, both) with respect to the company law records, resolutions, registers, secretarial and other statutory records, regulatory forms, filings, deeds, returns and other documents ("**Corporate Records**") in relation to the disclosures in the Offer Documents of the Company filed with the RoC under the Companies Act, 1956, Companies Act and rules made thereunder, since its incorporation.

Based on our search and review, we are issuing a search report which covers specific corporate actions undertaken by the Company during the period starting from its incorporation till the date hereof.

For the purposes of issuing this report, we have carried out a search and inspection of the Corporate Records as provided by the Company officials in the following manner:

- (i) Online search of the electronic Corporate Records of the Company (CIN: U35923PB1996PLC018348) available in the digital records/ database maintained on the Ministry of Corporate Affairs portal at [www.mca.gov.in](http://www.mca.gov.in) ("MCA Portal"), post digitalization of ROC records in the year 2006 and physical search/ inspection of the Corporate Records of the Company (CIN: U35923PB1996PLC018348) as maintained at the office of the RoC up to 18.01.2026 and carried out on 18.01.2026 vide challan number UU1872749;
- (ii) Physical search/ inspection of the Corporate Records maintained by the Company at the Company's registered office at Kanganwal road, Jaspal Banger, Ludhiana, Punjab, India -141 122 ("Company Office");
- (iii) Physical search/ inspection of the Corporate Records at the office of Registrar of Companies, Chandigarh at Chandigarh ("**ROC**").

**Basis on our in-depth search and inspection of the Corporate Records basls the procedure mentioned above, we enclose the following:**

- I. **Annexure B:** List of documents found/ not found during the physical search/ inspection at the Company Office;
- II. **Annexure C:** Summarizing details of forms found/ not found during physical search/inspection at the RoC's office;
- III. **Annexure D:** Details of forms downloaded from the MCA Portal pursuant to search undertaken on such portal;





However, the Company is unable to trace corporate records for information that may be included in the Offer Documents.

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- (ii) Physical search/ inspection of the Corporate Records maintained by the Company at the Company's registered office at Kanganwal road, Jaspal Banger, Ludhiana, Punjab, India -141 122 ("Company Office");
- (iii) Physical search/ inspection of the Corporate Records at the office of Registrar of Companies, Chandigarh at Chandigarh ("**ROC**").

**Basis on our in-depth search and inspection of the Corporate Records basls the procedure mentioned above, we enclose the following:**

- I. **Annexure B:** List of documents found/ not found during the physical search/ inspection at the Company Office;
- II. **Annexure C:** Summarizing details of forms found/ not found during physical search/inspection at the RoC's office;
- III. **Annexure D:** Details of forms downloaded from the MCA Portal pursuant to search undertaken on such portal;





- IV. **Annexure E:** List of Documents not available with RoC, accordingly alternate documents relied upon;
- V. **Annexure F:** List of challans in relation to our application to search for the records maintained by the Roc;
- VI. **Annexure G:** List of the discrepancies in the filings with the RoC, accordingly corrective actions advised;
- VII. **Annexure H:** The details of the capital structure of the Company, including the details of the history and build-up of the equity share capital of the Company, details of build-up of the shareholding of the promoters (duly stamped and initialed by us for identification); and
- VIII. **Annexure I:** The details of the list of forms, returns and other relevant corporate records pursuant to which search was undertaken on such portal.

We confirm that, on inspection of the secretarial records, such as return of allotment, minutes of the meetings of the Board and Shareholders, share transfer forms, DIS and regulatory forms filed by the Company on dates stated in our search report, certain documents mentioned could not be traced as the relevant information is not available in the records of the Ministry of Corporate Affairs at the MCA Portal, at the office of the RoC, or with the Company. In this regard, please see attached as **Annexure-F**, the challans in relation to our application to search for the records maintained by RoC.

Further, in absence of availability of certain Corporate Records as specified under **Annexure E**, we have relied upon the alternate documents as mentioned under the relevant annexures, which are deemed to be adequate for the purposes of placing reliance and making disclosures in the Offer Documents.

We hereby confirm that while providing this certificate we have complied with the regulations and applicable standards prescribed by the Institute of Company Secretaries of India.

Further, we hereby agree that the Book Running Lead Managers to the Offer, the legal counsels to the Company and any other third party related there to, appointed in connection with the Offer, may rely on the contents of this report (including the annexure hereto) for the purposes of the Offer. We hereby consent for this report being included for the records to be maintained by the Book Running Lead Managers in connection with the Offer.

We hereby consent to inclusion of our name, and have no objection to, the disclosure of this report or use of information from this report in any disclosure in the Offer Documents. We further consent to, and have no objection to, the disclosure of this report or use of information from this report or extracts of this report or providing reference to this report in any document/certificate that may be issued by any third party appointed in relation to the proposed Offer of the Company, for the purposes of making disclosures in the Offer Documents to be issued by the Company.





# K V BINDRA & ASSOCIATES

COMPANY SECRETARIES

We also consent to the inclusion of this letter as a part of "Material Contracts and Documents for Inspection" in connection with the Offer, which will be available to the public for inspection from date of the filing of the red herring prospectus until the bid/ Offer closing date including through online means on the website of the Company. We also consent to the references to us as "Practicing Company Secretary" in the Offer Documents and references to us as required under Section 26 (1) of the Companies Act 2013 read with the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended, and as "Expert" as defined under Section 2(38) of the Act to the extent and in our capacity as a practicing company secretary and in respect of our reports issued by us. However, we should not be construed to be "Expert" as defined under the US Securities Act of 1933.

We undertake to immediately intimate the Book Running Lead Managers and Legal Counsel in writing, in case of any changes to the above. In the absence of any such written communication, you may assume that there is no change in respect of the matters covered herein.

We hereby confirm that the information in this report is true, fair, complete, correct and accurate and there are no untrue statements or omissions which would render the contents of this report misleading in its form or context and will enable investors to make a well-informed decision. We also confirm that we are not and have not in the past, been engaged or interested in the formation or promotion or management of the Company. We further confirm that we are independent practicing company secretaries ("PCS") appointed by the Company, as well as the secretarial auditors of the Company for FY 2024-25 pursuant to engagement letter dated 6 June, 2024 with no direct or indirect interest in the Company except for provision of professional services in the ordinary course of our profession and neither the Company, its directors, its promoters, key managerial personnel, senior management personnel, nor the BRLMs are a related party to us.

Following are the particulars of the Company:

CIN	:	U35923PB1996PLC018348
Company Name	:	HAPPY STEELS PRIVATE LIMITED
Date of Incorporation	:	14.06.1996
Present Registered Office	:	Kanganwal road, Jaspal Banger, Ludhiana, Punjab, India - 141122.
Authorised and Paid-Up Capital	:	<b>Authorised Capital</b> :- 1,60,00,000 Equity Shares of face value of ₹ 10 each <b>Paid Up Capital</b> :-1,04,98,180 Equity Shares of face value ₹10 each
Details of reports	:	Date of last AGM: 30.09.2025
Company Status (for e-filing):	:	Active

We hereby consent to the submission of this certificate as may be necessary, to SEBI, Stock Exchanges, including the repository system of SEBI and/or the BSE Limited and National Stock Exchange of India Limited (together, the "Stock Exchanges"), RoC and/or any other governmental or any other statutory/ governmental/ regulatory authority as may be required and for the purpose of any defense that the Book Running Lead Managers may wish to advance in any claim or proceeding in connection with the contents of the Offer Documents and/or for the records to be maintained by the Book Running Lead Manager in connection with the offer and in accordance with applicable law. We represent that our

Kothi No. 9577, Sector 125, Sunny Enclave, Kharar

Mobile: 96464-97043

Email: [kvbindra@rediffmail.com](mailto:kvbindra@rediffmail.com)



execution, delivery and performance of this report have been duly authorised by all necessary actions (corporate or otherwise).

We also consent to the inclusion of this certificate/report as a part of the "Material Contracts and Documents for Inspection" in connection with this Offer, which will be available for public for physical inspection at the registered office of the Company, located at Kanganwal road, Jaspal Banger, Ludhiana, Punjab, India – 141122, as well as online inspection on the website of the Company, www.happsteels.com from date of the filing of the RHP until the Bid/ Offer Closing Date.

We agree to keep the information regarding the Offer strictly confidential.

All capitalized terms used herein and not specifically defined shall have the same meaning as ascribed to them in the Offer Documents.

Yours faithfully,

**FOR K V Bindra & Associates  
COMPANY SECRETARIES**



**KARAN VIR BINDRA  
PROPRIETOR**

**FCS-10074: COP-12962: PR-2522/2022**

**FRN: S2014PB243400**

**Place: Mohali**

**Date: 9<sup>th</sup> February, 2026**

**UDIN: F010074G003897421**

Enclosed: as above

CC:

**Book Running Lead Manager**

**Share India Capital Services Private Limited**

A-25, Sector-64, Noida-201301, Uttar Pradesh, India

**Co-Book Running Lead Manager**

**Master Capital Services Limited**

Master Chambers, S.C.O. 19, Feroze Gandhi Market, Ludhiana-141001, Punjab, India

**Legal Counsel to the Company**

Singhania & Co.

502, Bani Address One, Golf Course Road,

Gurugram, Haryana-122011, India



**THE INSTITUTE OF  
Company Secretaries of India**  
**भारतीय कम्पनी सचिव संस्थान**  
**IN PURSUIT OF PROFESSIONAL EXCELLENCE**  
Statutory body under an Act of Parliament  
(Under the jurisdiction of Ministry of Corporate Affairs)

Annexure-A

Certificate No. 2522/2022

# PEER REVIEW Certificate

*Certified that in terms of the Guidelines for Peer Review of Attestation and Audit Services by Practicing Company Secretaries in Practice issued by the Council, the Certification and Audit Services provided by CS. Karan Vir Bindra Company Secretary (ies) in Practice bearing Unique Identification No. I2014PB1132400 having his / her / its office at Chandigarh has been reviewed for the year 2020-21.*

*The Certificate is effective from the date of issue and shall remain valid till 31<sup>st</sup> July, 2027.*

*Saurabh Jain*

**CS Saurabh Jain**  
Secretary  
Peer Review Board

*Mohan Kumar*

**CS Mohan Kumar**  
Chairman  
Peer Review Board

Date : 30<sup>th</sup> November, 2025\*

\*Original date of issue 31<sup>st</sup> July, 2022

**Annexure- B**  
**(Particulars of documents not available at company's office)**  
**As on 09.02.2026**

Sr No	Particulars (which shall include number of form and challan available)	Type of document	Reference No. /SRN No. for the online searches	Date of document filing	Purpose	Challan Details	Remarks (Found/ Not Found)/ any other remarks
1	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 2,50,800-- Equity Shares of Rs. 10/- each at par on March 31, 1999 along with the list of allottees	NA	Not Found
2	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 7,29,650 -- Equity Shares of Rs. 10/- each at par on March 31, 2000 along with the list of allottees	NA	Not Found
3	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par on March 31, 2001 along with the list of	NA	Not Found



					allottees		
4.	Initial Memorandum of Association and Articles of Association	Memorandum of Association and Articles of Association	NA	NA	Initial Memorandum of Association and Articles of Association having Authorised Capital of Rs. 25 Lacs	NA	Not Found
5	Altered Memorandum of Association and Articles of Association	Memorandum of Association and Articles of Association	NA	NA	Alteration in MOA after increase in Authorized Share Capital from Rs. 25 Lacs to 50 Lacs	NA	Not Found
6.	Form No.1	Application or declaration for incorporation	NA	NA	Incorporation of Company	NA	Not Found
7.	Form 23 AC	Filing of Balance Sheet as on 31.03.1997,31.03.1998 ,31.03.1999,31.03.2000, 31.03.2001,31.03.2002 ,31.03.2003,31.03.2004,31.03.2005	NA	NA	Filing of Balance Sheet	NA	Not Found
8.	Form 23 ACA	Filing of Profit & Loss Account as on 31.03.1997,31.03.1998 ,31.03.1999,31.03.200	NA	NA	Filing of Profit & Loss	NA	Not Found



		0, 31.03.2001,31.03.2002 ,31.03.2003,31.03.200 4,31.03.2005					
9.	Form 23 B	Intimation of Appointment of First Statutory Auditors of the company in the board meeting held on 24.06.1996	NA	NA	Intimation of Appointment of First Statutory Auditors of the company -M/s Gupta Sharma & Associates, Statutory Auditors in the board meeting held on 24.06.1996 .	NA	Not Found
10.	Form No. 66	Compliance Certificate under Section 66 of Companies Act, 1956 as on 31.03.1999,31.03.2000 ,31.03.2001,31.03.200 2,31.03.2003,31.03.20 04,31.03.2005	NA	NA	Ensure and certify statutory compliance of companies which were not required to appoint a whole-time Company Secretary.	NA	Not Found
11.	Form No. 23	Filing of Resolution for Increase in Authorized Share Capital (AGM 28.09.1999)	NA	NA	Filing of Resolution for Increase in Authorized Capital from Rs 50 Lacs to Rs 1 Crore	NA	Not Found



12.	Form No. 32	Particulars of appointment of directors, manager or secretary and changes among them.	NA	NA	Intimation of Appointment of Sh. Parveen Kumar Garg, Sh. Sanjeev Kumar Garg, Sh. Paritosh Kumar Garg, Sh. Chanan Ram Garg at the time of Incorporation	NA	Not Found
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**Annexure- C**  
**(Particulars of documents not found at RoC's office)**  
**As on 09.02.2026**

Sr No	Particulars (which shall include number of form and challan available)	Type of document	Reference No. /SRN No. for the online searches	Date of document filing	Purpose	Challan Details	Remarks (Found/ Not Found)/ any other remarks
1	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 2,50,800-- Equity Shares of Rs. 10/- each at par on March 31, 1999 along with the list of allottees	NA	Not Found
2	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 7,29,650 -- Equity Shares of Rs. 10/- each at par on March 31, 2000 along with the list of allottees	NA	Not Found
3	Form No.2	Return of Allotment	NA	NA	Return of Allotment for allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par on March 31, 2001 along with the list of allottees	NA	Not Found



4.	Form No.1	Application or declaration for incorporation	NA	NA	Incorporation of Company	NA	Not Found
5.	Initial Memorandum of Association and Articles of Association	Memorandum of Association and Articles of Association	NA	NA	Initial Memorandum of Association and Articles of Association having Authorised Capital of Rs. 25 Lacs	NA	Not Found
6.	Altered Memorandum of Association and Articles of Association	Memorandum of Association and Articles of Association	NA	NA	Alteration in MOA after increase in Authorized Share Capital from Rs. 25 Lacs to 50 Lacs	NA	Not Found
7.	Form 23 AC	Filing of Balance Sheet as on 31.03.1997, 31.03.1998, 31.03.1999, 31.03.2000, 31.03.2001, 31.03.2002, 31.03.2003, 31.03.2004, 31.03.2005	NA	NA	Filing of Balance Sheet	NA	Not Found
8.	Form 23 ACA	Filing of Profit & Loss Account as on 31.03.1997, 31.03.1998, 31.03.1999,	NA	NA	Filing of Profit & Loss Account	NA	Not Found



		31.03.2000, 31.03.2001, 31.03.2002, 31.03.2003, 31.03.2004, 31.03.2005					
9.	Form 23 B	Intimation of Appointment of First Statutory Auditors of the company in the board meeting held on 24.06.1996	NA	NA	Intimation of Appointment of First Statutory Auditors of the company -M/s Gupta Sharma & Associates, Statutory Auditors in the board meeting held on 24.06.1996	NA	Not Found
10.	Form No. 66	Compliance Certificate under Section 66 of Companies Act, 1956 as on 31.03.1999, 31.03.2000, 31.03.2001, 31.03.2002, 31.03.2003, 31.03.2004, 31.03.2005	NA	NA	Ensure and certify statutory compliance of companies which were not required to appoint a whole-time Company Secretary.	NA	Not Found
11.	Form No. 23	Filing of Resolution for Increase in Authorized Capital	NA	NA	Filing of Resolution for Increase in Authorized Capital from Rs 50 Lacs to Rs 1 Crore	NA	Not Found



12.	Form No. 32	Particulars of appointment of directors, manager or secretary and changes among them.	NA	NA	Intimation of Appointment of Sh. Parveen Kumar Garg, Sh. Sanjeev Garg, Sh. Paritosh Kumar Garg, Sh. Chanan Ram Garg at the time of Incorporation.	NA	Not Found
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Annexure- D  
(DETAILS OF FORMS DOWNLOADED FROM THE MCA PORTAL PURSUANT TO SEARCH UNDERTAKEN)  
(Particulars of Documents registered with the RoC)  
AS ON 09.02.2026

Sr No	Forms Particulars	Date of Event	Particulars/ contents in the form	Document id given by ROC	Record date mentioned by ROC	Permanent documents ( Yes/ no)
Nil*						

- None of the documents requisitioned are available online



## Annexure- E

(FORMS NOT AVAILABLE/ MISSING WITH THE COMPANY AND IN ROC DATABASE AND NO ALTERNATE DOCUMENTS ARE AVAILABLE)

Sr No	Forms / Returns / documents filed	Purpose/ Details	Remarks
NIL			

(LIST OF DOCUMENTS UNAVAILABLE/ MISSING WITH ROC DATABASE AND ALTERNATE DOCUMENTS RELIED UPON)

Sr No	Forms / Returns / documents filed	Purpose/ Details	Remarks
1	Form No.2	Return of Allotment for allotment of 2,50,800-- Equity Shares of Rs. 10/- each at par on March 31, 1999 along with the list of allottees	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Board meeting minutes dated March 31, 1999 for, inter alia, allotment of 2,50,800-- Equity Shares of Rs. 10/- each at par.</li> <li>Register of Members maintained by company</li> </ol>
2	Form No.2	Return of Allotment for allotment of 7,29,650 -- Equity Shares of Rs. 10/- each at par on March 31, 2000 along with the list of allottees	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Board meeting minutes dated March 31, 2000 for, inter alia, allotment of 7,29,650-- Equity Shares of Rs. 10/- each at par.</li> <li>Register of Members maintained by company</li> </ol>



3	Form No.2	Return of Allotment for allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par on March 31, 2001 along with the list of allottees	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board meeting minutes dated March 31, 2001 for, inter alia, allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par.</li> <li>2. Register of Members maintained by company</li> </ol>
4.	Form No.1	Incorporation of Company	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Certificate of Incorporation</li> <li>2. Board meeting minutes dated June 24, 1996</li> </ol>
5.	Form 23 AC	Filing of Balance Sheet as on 31.03.1997,31.03.1998,31.03.1999,31.03.2000,31.03.2001,31.03.2002,31.03.2003,31.03.2004,31.03.2005	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board Meeting Minutes where Annual Accounts were considered and Adopted</li> <li>2. Minutes of the Annual General Meeting wherein the accounts for the financial year were adopted.</li> <li>3. Subsequent year ROC filings / Annual Return reflecting adoption of accounts.</li> <li>4. Statutory Registers / Accounting Records maintained by the Company evidencing preparation and approval of accounts.</li> </ol>
6.	Form 23 ACA	Filing of Profit & Loss Account as on 31.03.1997,31.03.1998,31.03.1999,31.03.2000,31.03.2001,31.03.2002,31.03.2003,31.03.2004,31.03.2005	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board Meeting Minutes where Annual Accounts were considered and Adopted.</li> <li>2. Minutes of the Annual General Meeting wherein the accounts for the financial year were adopted.</li> <li>3. Subsequent year ROC filings / Annual Return reflecting adoption of accounts.</li> <li>4. Statutory Registers / Accounting Records maintained</li> </ol>



3	Form No.2	Return of Allotment for allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par on March 31, 2001 along with the list of allottees	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board meeting minutes dated March 31, 2001 for, inter alia, allotment of 5,18,890-- Equity Shares of Rs. 10/- each at par.</li> <li>2. Register of Members maintained by company</li> </ol>
4.	Form No.1	Incorporation of Company	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Certificate of Incorporation</li> <li>2. Board meeting minutes dated June 24, 1996</li> </ol>
5.	Form 23 AC	Filing of Balance Sheet as on 31.03.1997,31.03.1998,31.03.1999,31.03.2000,31.03.2001.31.03.2002,31.03.2003,31.03.2004,31.03.2005	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board Meeting Minutes where Annual Accounts were considered and Adopted</li> <li>2. Minutes of the Annual General Meeting wherein the accounts for the financial year were adopted.</li> <li>3. Subsequent year ROC filings / Annual Return reflecting adoption of accounts.</li> <li>4. Statutory Registers / Accounting Records maintained by the Company evidencing preparation and approval of accounts.</li> </ol>
6.	Form 23 ACA	Filing of Profit & Loss Account as on 31.03.1997,31.03.1998,31.03.1999,31.03.2000,31.03.2001.31.03.2002,31.03.2003,31.03.2004,31.03.2005	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>1. Board Meeting Minutes where Annual Accounts were considered and Adopted.</li> <li>2. Minutes of the Annual General Meeting wherein the accounts for the financial year were adopted.</li> <li>3. Subsequent year ROC filings / Annual Return reflecting adoption of accounts.</li> <li>4. Statutory Registers / Accounting Records maintained</li> </ol>



			by the Company evidencing preparation and approval of accounts.
7.	Form 23 B	Intimation of Appointment of First Statutory Auditors of the company - M/s Gupta Sharma & Associates, Statutory Auditors in the board meeting held on 24.06.1996	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Minutes of the Board Meeting dated 24.06.1996 approving the appointment of M/s Gupta Sharma &amp; Associates as First Statutory Auditors under Section 224(5) of the Companies Act, 1956.</li> </ol>
8.	Form No. 66	Compliance Certificate under Section 66 of Companies Act, 1956 as on 31.03.1999, 31.03.2000, 31.03.2001, 31.03.2002, 31.03.2003, 31.03.2004, 31.03.2005	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Subsequent year(s) Compliance Certificates / Secretarial records, indicating a continuing pattern of compliance.</li> </ol>
9.	Form No. 23	Filing of Resolution for Increase in Authorized Capital from ₹50 Lacs to ₹1 Crore	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Minutes of the Annual General Meeting held on 28.09.1999.</li> <li>Form 5 for increase in Authorised Capital.</li> </ol>
10.	Form No. 32	Intimation of Appointment of Sh. Parveen Kumar Garg, Sh. Sanjeev Garg, Sh. Paritosh Kumar Garg, Sh. Chanan Ram Garg at the time of Incorporation.	<b>Alternate Documents Relied Upon Are:-</b> <ol style="list-style-type: none"> <li>Board Meeting Minutes dated 24-06-1996</li> <li>Register of Directors maintained under Section 303 of the Companies Act, 1956, reflecting cessation.</li> <li>Statutory Registers- Register of Directors evidencing the Appointment in directorship</li> </ol>



Annexure- F  
(LIST OF CHALLANS IN RELATION TO OUR APPLICATION TO SEARCH FOR THE RECORDS MAINTAINED BY ROC)  
AS ON 09.02.2026

Sr No	Date	Srn No	Type of Document
1	January 18,2026	UU1872749	Inspection of Public documents of Happy Steels Limited (CIN:U35923PB1996PLC018348) by M/s KV Bindra & Associates



Annexure- G  
(LIST OF DISCREPENCIES IN THE FILINGS WITH ROC AND CORRECTIVE ACTIONS ADVISED)

AS ON 09.02.2026

Sr No	Discrepancies In The Filings	Corrective Actions Advised
None		



## Annexure- H-I

## History of equity share capital of the Company

Date of allotment of Equity Shares	Number of Equity shares allotted	Number of allottees	Details of allottees	Face Value per equity share (₹)	Issue price per equity share (₹)	Nature of consideration	Reason/ nature of allotment	Cumulative Number of shares	Cumulative paid up equity share capital(₹)
14 <sup>th</sup> June, 1996	400 (Ref. Table No. 1)	4	Table1	10	10	Cash	Initial subscription to the Memorandum of Association	400	4000
31 <sup>ST</sup> March, 1999	250800 (Ref. Table No. 2)	6	Table2	10	10	Cash	Further Issue	251200	2512000
31 <sup>ST</sup> March, 2000	729650 (Ref. Table No. 3)	14	Table3	10	10	Cash	Further Issue	980850	9808500
31 <sup>ST</sup> March, 2001	518890 (Ref. Table No. 4)	8	Table4	10	10	Cash	Further Issue	1499740	14997400
29 <sup>th</sup> December, 2025	8998440 (Ref. Table No. 5)	21	Table5	10	NIL	Bonus	Bonus Issue	10498180	104981800



Table No.1

Sr No	Name	Number of Shares Subscribed
1.	Mr. Parveen Kumar Garg	100
2.	Mr. Paritosh Kumar	100
3.	Mr. Sanjeev Garg	100
4.	Mr. Chanan Ram Garg	100
	Total	400

Table No.2

Sr No	Name	Number of Shares Allotted
1.	Mr. Parveen Kumar Garg	44900
2.	M/s Parveen Garg HUF	100
3.	Mr. Sanjeev Garg	55600
4.	M/s Sanjeev Garg HUF	100
5.	Mr. Chanan Ram Garg	55000
6.	M/s Chanan Ram HUF	95100
	Total	250800



Table No.5

Sr. No.	Name of Allottee	Number of Equity Shares
1.	Abhishek Garg	416550
2.	Bindu Garg	420600
3.	Charushree Garg	93600
4.	Deepak Garg	417150
5.	Parveen Kumar Garg	6940476
6.	Ridhima Garg	93000
7.	Vikas Giya	60000
8.	Parveen Garg Huf	556500
9.	Aman Kumar Jain	60
10.	Amit Kumar Jain	60
11.	Devender Kumar & Sons	60
12.	Hem Lata	60
13.	Kusum Lata	60
14.	Kusum Rani	60
15.	Raj Kumar Singla	60
16.	Raj Rani	60
17.	Vinod Kumar Jain	60
18.	Sunil Chhabra	6
19.	Vijay Vinod	6
20.	Vimal Vivek	6
21.	Rishab Giya	6
	<b>Total</b>	<b>8998440</b>



Table No.3

Sr. No.	Name of Allottee	Number of Equity Shares
1.	Mr. Parveen Kumar Garg	1,58,100
2.	Mr. Paritosh Kumar	8,000
3.	Mr. Sanjeev Garg	1,76,400
4.	Mr. Chanan Ram Garg	1,35,000
5.	M/s Parveen Kumar HUF	10,000
6.	M/s Sanjeev Garg HUF	10,000
7.	M/s Chanan Ram HUF	70,000
8.	M/s Paritosh Kumar HUF	9,500
9.	M/s Bindu Garg	1,20,000
10.	Ms. Ankita Garg	3,200
11.	Ms. Deepti Garg	5,500
12.	Mr. Shubham Garg	2,250
13.	Mr. Deepak Garg	10,900
14.	Mr. Abhishek Garg	10,800
	Total	729650

Table No.4

Sr. No.	Name of Allottee	Number of Equity Shares
1.	Mr. Parveen Kumar Garg	2,26,600
2.	Mr. Sanjeev Garg	2,79,000
3.	M/s Sanjeev Garg HUF	8,500
4.	Ms. Ankita Garg	450
5.	Ms. Deepti Garg	800
6.	Mr. Shubham Garg	340
7.	Mr. Deepak Garg	1,600
8.	Mr. Abhishek Garg	1,600
	Total	518890



## Annexure- H-II

## Buildup of Promoters' equity shareholding in the Company

1. Mr. Parveen Kumar Garg							
Date of allotment/ Transfer	Number of fully paid-up equity shares	Face Value per equity share (₹)	Issue/ Transfer price per equity share (₹)	Nature of consideration	Nature of acquisition/ allotment/ transfer	Percentage of Pre- equity share capital (%)	Percentage of Post-offer equity share capital (%)
14 <sup>th</sup> June, 1996	100	10	10	Cash	Allotment- Initial subscription to the Memorandum of Association	Negligible	(.)
31 <sup>ST</sup> March, 1999	44900	10	10	Cash	Further Issue	0.43	(.)
31 <sup>ST</sup> March, 2000	158100	10	10	Cash	Further Issue	1.51	(.)
31 <sup>ST</sup> March, 2001	2,26,000	10	10	Cash	Further Issue	2.16	(.)
1 <sup>st</sup> November, 2001	38,300	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Ms. Bindu Garg	0.36	(.)
1 <sup>st</sup> October, 2006	50,100	10	Nil	Other than cash	Transmission of Equity shares from Mr. Chanan Ram Garg	0.48	(.)



22 <sup>nd</sup> March, 2023	1,51,760	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Mr. Sanjeev Garg	1.45	(.)
22 <sup>nd</sup> March, 2023	6300	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Ms. Deepti	0.06	(.)
30 <sup>th</sup> January, 2024	2590	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Mr. Shubham Garg	0.02	(.)
30 <sup>th</sup> January, 2024	455250	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Mr. Sanjeev Garg	4.34	(.)
20 <sup>th</sup> April, 2024	29100	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Ms. Neeraj Garg	0.28	(.)
20 <sup>th</sup> April, 2024	3650	10	Nil	Other than cash	Transfer of Equity shares by way of gift from Ms. Ankita Garg	0.03	(.)
26 <sup>th</sup> June, 2024	(-10,000)	10	200	Cash	Transfer of Equity shares way of gift to Mr. Vikas Giya	(0.10)	(.)
12 <sup>th</sup> March, 2025	-1	10	Nil	Other than cash	Transfer of Equity shares way of gift to Mr. Sunil Chhabra	Negligible	(.)



12 <sup>th</sup> March, 2025	-1	10	Nil	Other than cash	Transfer of Equity shares way of gift to Mr. Vjay Vinod	Negligible	(.)
12 <sup>th</sup> March, 2025	-1	10	Nil	Other than cash	Transfer of Equity shares way of gift to Mr. Vimal Vivek	Negligible	(.)
12 <sup>th</sup> March, 2025	-1	10	Nil	Other than cash	Transfer of Equity shares way of gift to Mr. Rishabh Giya	Negligible	(.)
29 <sup>th</sup> December, 2025	69,40,476	10	Nil	Other than cash	Bonus Allotment	66.11	(.)
Total	80,97,222					77.13	

2. M/s Parveen Garg HUF							
Date of allotment/ Transfer	Number of fully paid-up equity shares	Face Value per equity share (₹)	Issue price per equity share (₹)	Nature of consideration	Nature of acquisition/ allotment/ transfer	Percentage of Pre-offer equity share capital (%)	Percentage of Post-offer equity share capital (%)
31 <sup>ST</sup> March, 1999	100	10	10	Cash	Further Issue	Negligible	(.)
31 <sup>ST</sup> March, 2000	10,000	10	10	Cash	Further Issue	0.10	(.)
31 <sup>ST</sup> March, 2006	100	10	NIL	Other than cash	Transfer of Equity shares by way of gift From Ms. Suman	Negligible	(.)



1 <sup>st</sup> October, 2006	82,550	10	Nil	Other than cash	Transmission of Equity shares From M/s Chanan Ram Garg HUF	0.79	(.)
29 <sup>th</sup> December, 2025	5,56,500	10	Nil	Other than cash	Bonus Allotment	5.30	(.)
Total	6,49,250					6.19	

3. Mr. Deepak Garg							
Date of allotment/ Transfer	Number of fully paid-up equity shares	Face Value per equity share (₹)	Issue price per equity share (₹)	Nature of consideration	Nature of acquisition/ allotment/ transfer	Percentage of Pre-offer equity share capital (%)	Percentage of Post-offer equity share capital (%)
31 <sup>ST</sup> March, 2000	10900	10	10	Cash	Further Issue	0.10	(.)
31 <sup>ST</sup> March, 2001	1600	10	10	Cash	Further Issue	0.02	(.)
1 <sup>st</sup> October, 2006	22000	10	Nil	Other than cash	Transmission of Equity shares from Mr. Chanan Ram Garg	0.21	(.)
26 <sup>th</sup> June, 2024	35025	10	205	Cash	Transfer of Equity shares from M/s Sanjeev Garg HUF	0.33	(.)
29 <sup>th</sup> December, 2025	4,17,150	10	Nil	Other than cash	Bonus Allotment	3.97	(.)
Total	4,86,675					4.64	



4. Mr. Abhishek Garg							
Date of allotment/ Transfer	Number of fully paid-up equity shares	Face Value per equity share (₹)	Issue price per equity share (₹)	Nature of consideration	Nature of acquisition/ allotment/ transfer	Percentage of Pre- offer equity share capital (%)	Percentage of Post-offer equity share capital (%)
31 <sup>ST</sup> March, 2000	10800	10	10	Cash	Further Issue	0.10	(.)
31 <sup>ST</sup> March, 2001	1600	10	10	Cash	Further Issue	0.02	(.)
1 <sup>ST</sup> October, 2006	22000	10	Nil	Other than cash	Transmission of Equity shares from Mr. Chanan Ram Garg	0.21	(.)
26 <sup>th</sup> June, 2024	35025	10	205	Cash	Transfer of Equity shares from M/s Sanjeev Garg HUF	0.33	(.)
29 <sup>th</sup> December, 2025	4,16,550	10	Nil	Other than cash	Bonus Allotment	3.97	(.)
Total	4,85,975					4.63	

