



**GOVERNMENT OF INDIA
MINISTRY OF CORPORATE AFFAIRS**

ROC Ahmedabad

Registrar Of Companies, ROC Bhavan, Opp Rupal Park Society, Behind Ankur Bus Stop, Naranpura, Ahmedabad, Gujarat,
India, 380013

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Order ID: PO/ADJ/04-2026/AD/01927

Dated: 01/04/2026

ORDER FOR ADJUDICATION OF PENALTY UNDER SECTION 454 OF THE COMPANIES ACT, 2013 ('THE ACT') FOR VIOLATION OF SECTION 172 OF THE COMPANIES ACT, 2013.

A. Appointment of Adjudicating Officer:

Ministry of Corporate Affairs vide its Gazette notification number S.O. 698(E) dated 10/02/2026 appointed undersigned as Adjudicating Officer in exercise of the powers conferred by section 454 of the Companies Act, 2013 [herein after known as Act] read with Companies (Adjudication of Penalties) Rules, 2014 for adjudging penalties under the provisions of this Act.

B. Company details:

In the matter relating to SHREEJIKRUPA PROJECT LIMITED [herein after known as Company] bearing CIN U45200GJ2006PLC047509, is a company registered with this office under the Provisions of the Companies Act, 2013/1956 having its registered office situated at OFFICE-303, ISKON MALL, NR. BIG BAZAR 150 FT. RING ROAD, NA RAJKOT RAJKOT GUJARAT INDIA 360001

Individual details:

In the matter relating to SANJAY KUMAR VARSANI [herein after known as individual] having DIN 01562839 and having its address at HOUSE NO.28, SBI COLONY, SUNDAR NAGAR RAIPUT RAIPUR CHATTISGARH INDIA 492013



C. Provisions of the Act:

If a company is in default in complying with any of the provisions of this Chapter and for which no specific penalty or punishment is provided therein, the company and every officer of the company who is in default shall be liable to a penalty of fifty thousand rupees, and in case of continuing failure, with a further penalty of five hundred rupees for each day during which such failure continues, subject to a maximum of three lakh rupees in case of a company and one lakh rupees in case of an officer who is in default.

D. Facts about the case:

1. Default committed by the officers in default/notictee - The company has filed GNL-1 vide SRN AC2280640 dated 13.02.2026 in the matter of Suo moto adjudication application under Section 149(4) of the Companies Act, 2013 made by M/s. Shreejkrupa Project Limited and the company has mentioned Suo motto adjudication application para 9(b) that the company has designated Mr. Sanjay Kumar Varsani (Din: 01562839), Whole time Director, as the ?Officer in Default? for the purpose of the present default and has filed e-form GNL-3 vide SRN AC1624975 dated 21.06.2026 and requested that the levied only upon the Officer in Default, in accordance with the provisions of Section 2 (60) of the companies Act, 2013. As per Suo moto adjudication application clause 4(IV) (3) regarding facts of case the company has stated that in accordance with Section 149(1) of the Companies Act, 2013 read with Rule 3 of the Companies (Appointment and Qualification of Directors) Rules, 2014 the company was required to appoint woman director on the board of directors from 01.04.2020 as the turnover of the company was Rs. 349.17 Crores in the Financial Year 31.03.2020. The company appointed Ms. Chandni Mahendra Malaviya (DIN:10466774) as Independent Woman Director on the board w.e.f. 29.01.2024. However, it was observed that the company has fails to appoint at least one-woman Director on the board from 01.04.2020 to 29.01.2024. The default period from 01.04.2020 to 29.01.2024 (1398 days) and the default was made good on 29.01.2024. The penal provisions of section 172 of the Companies Act, 2013.

2. Voluntary adjudication application made by Company and a Whole-time director.

E.Order:

1. The company is found to have violated sec 149(1) of the Companies Act, 2013.

2. The details of penalty imposed on the company, officers in default and others are shown in the table below:

(A)	Name of person on whom penalty imposed (B)	Rectification of Default required (C)	Penalty Amount (D)	Additional Penalty (E) (*Per day of continuing default i.e. date of rectification of default less order issue date)	Maximum limit for Penalty (F)
1	SHREEJIKRUPA PROJECT LIMITED having CIN as U45200GJ2006P LC047509		300000	0	300000
2	SANJAY KUMAR VARSANI having DIN as 01562839		100000	0	100000



3. The notified officers in default/noticee shall rectify the default mentioned above and pay the penalty, so applicable within 90 days of receipt of the order.
4. The notified officers in default/noticee shall pay the penalty amount via 'e-Adjudication' facility which can be accessed through the respective login IDs on the website of Ministry of Corporate Affairs and upload the copy of paid challan / SRN of e-filing (if applicable) on the 'e-Adjudication' portal itself. It is also directed that the penalty so imposed upon the officers in default shall be paid from their personal sources/income.
5. Appeal against this order may be filed in writing with the Regional Director, RD Ahmedabad within a period of sixty days from the date of receipt of this order, in Form ADJ setting for the grounds of appeal and shall be accompanied by a certified copy of this order [Section 454 (5) & 454 (6) of the Act, read with Companies (Adjudication of Penalties) Rules, 2014].
6. For penal consequences of non-payment of penalty within the prescribed time limit, please refer Section 454(8) of the Companies Act, 2013.



Keerthi Narayana,
Registrar of Companies
ROC Ahmedabad

To,

1. SHREEJIKRUPA PROJECT LIMITED, OFFICE-303, ISKON MALL, NR. BIG BAZAR 150 FT. RING ROAD, RAJKOT
RAJKOT GUJARAT INDIA 360001, shreejikrupa_limited@rediffmail.com

2. SANJAY KUMAR VARSANI, HOUSE NO.28, SBI COLONY, SUNDAR NAGAR RAIPUT RAIPUR CHATTISGARH
INDIA 492013, splsanjayvarsani@rediffmail.com

