



**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/05-2025/AD/00305

Dated: 14/05/2025

ORDER FOR ADJUDICATION OF PENALTY UNDER SECTION 454 OF THE COMPANIES ACT, 2013 ('THE ACT') FOR VIOLATION OF SECTION 450 OF THE COMPANIES ACT, 2013.

A. Appointment of Adjudicating Officer:

Ministry of Corporate Affairs vide its Gazette notification number S.O. 831(E) dated 24/03/2015 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 JAINAM BROKING LIMITED [herein after known as Company] bearing CIN U67120GJ2003PLC043162, is a company registered with this office under the Provisions of the Companies Act, 2013/1956 having its registered office situated at P03-02C, P03-02D & P03-02E, 3rd Floor P03-02C, P03-02D & P03-02E, 3rd Floor Dabhoda Gandhinagar Gandhi Nagar Gujarat India

Individual details:

In the matter relating to DISHANT MILANBHAI PARIKH [herein after known as individual] having DIN 07761167 and having its address at 4/A-B, Sidhshetra Apartment, A ? TowerAbove Sargam Shopping Centre, Parle Poin,t, SVR Col 4/A-B, Sidhshetra Apartment, A ? TowerAbove Sargam Shopping Centre, Parle Poin,t, SVR Col Surat Gujarat India

In the matter relating to MEGHAVI RAJESH GONAWALA [herein after known as individual] having PAN CACPG2098A and having its address at B-301, P-97, TRIDEV APPT.,KARMAYOGI SOC.-1, B/S. J.P. BAKERY,Surat City, B-301, P-97, TRIDEV APPT.,KARMAYOGI SOC.-1, B/S. J.P. BAKERY,Surat City, Surat Gujarat India

In the matter relating to MITTAL NARENDRABHAI SHAH [herein after known as individual] having PAN EJHPS8587L and having its address at 1103, SUN TOWER, RAJHANS CAMPUS, OPP. RAJHANS MULTIPLEX, P,AL,SURAT,395003,Gujarat,India 1103, SUN TOWER, RAJHANS CAMPUS, OPP. RAJHANS MULTIPLEX, P,AL,SURAT,395003,Gujarat,India Surat Gujarat India

In the matter relating to MILAN SURESH PARIKH [herein after known as individual] having DIN 00085061 and having its address at 2, SAMTA, NEHRUNAGAR SOCIETY, DUMAS ROAD, ICCHANATH, 2, SAMTA, NEHRUNAGAR SOCIETY, DUMAS ROAD, ICCHANATH, Surat Gujarat India

In the matter relating to ANAL MILAN PARIKH [herein after known as individual] having DIN 01404198 and having its address at 2, Samta Nehru Nagar Soc., Dumas Road, Ichhanath, 2, Samta Nehru Nagar Soc., Dumas Road, Ichhanath, Surat Surat Gujarat India

In the matter relating to VIDHI DISHANT PARIKH [herein after known as individual] having DIN 07788145 and having its address at 2, Samta Bungalow Nehru NagarDumas Road 2, Samta Bungalow Nehru NagarDumas Road Surat Gujarat India

C. Provisions of the Act: If a company or any officer of a company or any other person contravenes any of the provisions of this Act or the rules made thereunder, or any condition, limitation or restriction subject to which any approval, sanction, consent, confirmation, recognition, direction or exemption in relation to any matter has been accorded, given or granted, and for which no penalty or punishment is provided elsewhere in this Act, the company and every officer of the company who is in default or such other person shall be liable to a penalty of ten thousand rupees, and in case of continuing contravention, with a further penalty of one thousand rupees for each day after the first during which the contravention continues, subject to a maximum of two lakh rupees in case of a company and fifty thousand rupees in case of an officer who is in default or any other person]

D. Facts about the case:

1. Default committed by the officers in default/noticee - The Company has filed suo-moto application for adjudication proceedings vide SRN N29229333, Form GNL-1 on 05.03.2025 to adjudicate the non-compliance with the provision of section 135(1) of the Companies Act, 2013 regarding non constitution of a Corporate Social Responsibility Committee during the period from 09.11.2021 to 13.09.2023. The company citing in the application that the company became a public Limited Company following its conversion from a Private Limited Company on 09.11.2021. On the same date the company met the Net Profit Criteria set forth under Section 135(1) of the Companies Act, 2013 as its Net Profit for the financial year 2020-21 exceeded INR 5 Crores. As per the requirement of Companies Act, 2013 and the Companies (Corporate Social Responsibility Policy) Rules 2014, the company was mandated to appoint Independent Directors, based on the latest audited financial statements along with that pursuant to Section 135(1) if company has required to appoint the Independent Directors, then corporate social responsibility committee should consist at least one Independent Director of the Company. The company duly appointed Mr. Bhuvnesh Sunderlal Vilayatrani as an Additional Independent Director with effect from April 24, 2023. This appointment was made in compliance with the provisions of the Companies Act, 2013 and the Companies (Appointment and Qualifications of Directors) Rules 2014. Thereafter, the Board has duly re-constituted the corporate Social Responsibility ((CSR) committee as on September 12, 2023 with requisite number of Directors as stated provisions of the Act and the rules made thereunder. Contravention of Section 135(1) of the Act was from a period 09.11.2021 to 12.09.2023 and the said contravention also has been made good by reconstituting the CSR Committee and complied with effect from September 13, 2023. On perusal of application it has been observed that the company has committed default during the period from 09/11/2021 to 12.09.2023 for which separate proceedings under Section 454 of the Companies Act, 2013 would be initiated.

2. Upon receipt of request of company/ Officers/KMPs, hearing was fixed on 02.05.2025

E. Order:

1. Reason for imposition of penalty, to be entered manually
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	JAINAM BROKING LIMITED having CIN as U67120GJ2003P LC043162		200000	0	200000
2	DISHANT MILANBHAI PARIKH having DIN as 07761167		50000	0	50000
3	MEGHAVI RAJESH GONAWALA having PAN as CACPG2098A		50000	0	50000
4	MITTAL NARENDRABHAI SHAH having PAN as EJHPS8587L		50000	0	50000
5	MILAN SURESH PARIKH having DIN as 00085061		50000	0	50000
6	ANAL MILAN PARIKH having DIN as 01404198		32000	0	50000
7	VIDHI DISHANT PARIKH having DIN as 07788145		50000	0	50000

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. JAINAM BROKING LIMITED, P03-02C, P03-02D & P03-02E, 3rd Floor P03-02C, P03-02D & P03-02E, 3rd Floor
Gandhinagar Gandhi Nagar Gujarat India , corp@jainam.in

2. DISHANT MILANBHAI PARIKH, 4/A-B, Sidhkshetra Appartment, A ? TowerAbove Sargam Shopping Centre, Parle
Poin,t, SVR Col 4/A-B, Sidhkshetra Appartment, A ? TowerAbove Sargam Shopping Centre, Parle Poin,t, SVR Col Surat
Gujarat India , parikh_dishant@yahoo.co.in

3. MEGHAVI RAJESH GONAWALA, B-301, P-97, TRIDEV APPT.,KARMAYOGI SOC.-1, B/S. J.P. BAKERY,Surat City, B-
301, P-97, TRIDEV APPT.,KARMAYOGI SOC.-1, B/S. J.P. BAKERY,Surat City, Surat Gujarat India ,
MEGHAGONAWALA456@GMAIL.COM

4. MITTAL NARENDRABHAI SHAH, 1103, SUN TOWER, RAJHANS CAMPUS, OPP. RAJHANS MULTIPLEX,
P,AL,SURAT,395003,Gujarat,India 1103, SUN TOWER, RAJHANS CAMPUS, OPP. RAJHANS MULTIPLEX,
P,AL,SURAT,395003,Gujarat,India Surat Gujarat India , csmittalshah@gmail.com

5. MILAN SURESH PARIKH, 2, SAMTA, NEHRUNAGAR SOCIETY, DUMAS ROAD, ICCHANATH, 2, SAMTA,
NEHRUNAGAR SOCIETY, DUMAS ROAD, ICCHANATH, Surat Gujarat India , milan.parikh@jainam.in

6. ANAL MILAN PARIKH, 2, Samta Nehru Nagar Soc., Dumas Road, Ichhanath, 2, Samta Nehru Nagar Soc., Dumas Road,
Ichhanath, Surat Surat Gujarat India , paanal1971@gmail.com

7. VIDHI DISHANT PARIKH, 2, Samta Bungalow Nehru NagarDumas Road 2, Samta Bungalow Nehru NagarDumas Road
Surat Gujarat India , vidhimehra92@gmail.com