

# Annexure C

### FORM NO. MGT 9

#### **EXTRACT OF ANNUAL RETURN**

### As on the financial year ended on 31st March 2019

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

### I. REGISTRATION AND OTHER DETAILS:

CIN	:	L63010GJ1992PLC018106
Registration Date	:	5 <sup>th</sup> August 1992
Name of the Company	:	Gujarat Pipavav Port Limited
Category / Sub-Category of the Company	:	Company having Share Capital
Address of the Registered office and contact details	:	Pipavav Port, At Post Rampara-2 via Rajula, District Amreli, Gujarat 365560 Tel: 02794 302400 Fax: 02794 302413 Email: investorrelationinppv@apmterminals.com
Whether listed company	:	Yes
Name, Address and Contact details of Registrar and Transfer Agent, if any:	:	Karvy Fintech Private Limited (formerly known as Karvy Computershare Private Limited) Karvy Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad- 500032 Tel: 040 67162222 Email: murthy.psrch@karvy.com

#### II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY:

All the business activities contributing 10 % or more of the total turnover of the company shall be stated:-

Name and Description of main products/services	NIC Code of the Product/ service	% to total turnover of the company
Cargo handling incidental to Water Transport	52242	100%

### III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES:

Name and address of the Company	CIN / GLN	Holding / subsidiary / associate	% of shares held	Applicable section
Pipavav Railway Corporation Limited B-1202 (B-Wing) 12th Floor Statesman House 148, Barakhamba Road Connaught Place New Delhi-110001	U45200DL2000PLC151199	Associate	38.8%	2(6)



# IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity):

# (i) Category-wise Share Holding:

Category of Shareholders	No. of		d at the begin	ning	No.		held at the end	lof	% Change
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	during the year
A. Promoters									
(1) Indian									
a)Individual/HUF									
b) Central Govt									
c) State Govt(s)									
d) Bodies Corporate									
e) Banks / FI									
f) Any other									
Sub-total(A)(1):									
(2) Foreign									
a) NRIs - Individuals									
b) Other – Individuals									
c) Bodies Corporate	207,903,931		207,903,931	43.01	207,903,931		207,903,931	43.01	
d) Banks / FI									
e) Any other									
Sub-total (A)(2):	207,903,931		207,903,931	43.01	207,903,931		207,903,931	43.01	
Total shareholding	207,903,931		207,903,931	43.01	207,903,931		207,903,931	43.01	
of Promoter (A) = $(A)(1)+(A)(2)$									
B. Public Shareholding									
(1) Institutions									
a) Mutual Funds	92,487,424		92,487,424	19.13	112,913,910		112,913,910	23.36	4.23
b) Banks / FI	5,581,538		5,581,538	1.15	5,415,335		5,415,335	1.12	-0.03
c) Central Govt									
d) State Govt(s)									
e)Venture Capital Funds									
f)Insurance Companies									
g) FIIs	139,493,704		139,493,704	28.86	116,300,184		116,300,184	24.06	-4.80
a) Foreign Venture Capital	, ,						, ,		
Funds									
i) Others (specify)									
Sub-total (B)(1):	237,562,666		237,562,666	49.14	234,629,429		234,629,429	48.53	-0.59
(2)Non-Institutions									
a) Bodies Corporate									
i) Indian	14,664,021	28,000	14,692,021	3.04	14,034,062	28,000	14,062,062	2.91	-0.13
ii) Overseas	. ,	,					,		
b) Individuals									
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	15,312,161	376,941	15,689,102	3.25	15,221,498	330,092	15,551,590	3.22	-0.03
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	5,635,099	66,322	5,701,421	1.18	8,193,691	66,322	8,260,013	1.71	0.53
c) Others (specify)									



Category of Shareholders	No. of Shares held at the beginning of the year				No.	of	% Change		
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	during the year
Clearing Members	167,590		167,590	0.03	1,048,699		1,048,699	0.22	0.18
Non Resident Indians	901,227	217,600	1,118,827	0.23	879,270	212,600	1,091,870	0.23	-0.01
Non Resident Non Repatriation	583,282		583,282	0.12	848,851		848,851	0.18	0.05
Trusts	21,070		21,070	0.00	43,465		43,465	0.01	0.00
d) Qualified Foreign Investor									
Sub-total(B)(2):	37,284,450	688,863	37,973,313	7.85	40,269,536	637,014	40,906,550	8.46	0.59
Total Public Shareholding (B)=(B)(1)+(B)(2)	274,847,116	688,863	275,535,979	56.99	274,898,965	637,014	275,535,979	56.99	0.00
C. Shares held by Custodian for GDRs & ADRs									
Grand Total (A+B+C)	482,751,047	688,863	483,439,910	100	482,802,896	637,014	483,439,910	100	

### (ii) SHAREHOLDING OF PROMOTERS:

Shareholder's Name	Shareholding at the beginning of the year			Sharehol			
	No. of Shares	% of total Shares of the Company	% of Shares Pledged/ encumbered to total shares	No. of Shares	% of total Shares of the Company	% of Shares Pledged/ encumbered to total shares	% change in share holding during the year
APM Terminals Mauritius Ltd	207,903,931	43.01		207,903,931	43.01		
Total	207,903,931	43.01		207,903,931	43.01		

## (iii) CHANGE IN PROMOTERS' SHAREHOLDING (PLEASE SPECIFY, IF THERE IS NO CHANGE):

	Shareholding at the y		areholding during year	
	No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
At the beginning of the year	207,903,931	43.01	207,903,931	43.01
Date wise Increase/ Decrease in Promoters Share holding during the year specifying the reasons for increase/decrease (e.g. allotment/transfer/bonus/sweat equity etc)		NIL	NIL	NIL
At the End of the year	207,903,931	43.01	207,903,931	43.01

# (iv) SHAREHOLDING PATTERN OF TOP TEN SHAREHOLDERS (OTHER THAN DIRECTORS, PROMOTERS AND HOLDERS OF GDRS AND ADRS):

Sr. No	Name of the Shareholder	Shareholdi beginning o	•	Change in Shareholding (No. of Shares)			Cumulative Shareholding during the year		
		No of Shares	% of total shares of the Company	Date	Increase/ Decrease in Share holding	Reason	No of Shares	% of total shares of the Company	
1	ICICI Prudential Value Fund- Series 3	35,005,553	7.24%				35,005,553	7.24%	
				6/4/2018	276	Transfer	35,005,829	7.24%	
				13/4/2018	112,112	Transfer	35,117,941	7.26%	

# GUJARAT PIPAVAV PORT LTD.

Sr. No	Name of the Shareholder	Shareholdi beginning o			in Shareholdii . of Shares)	ng	Cumulative Shareholding during the year		
		No of Shares	% of total shares of the Company	Date	Increase/ Decrease in Share holding	Reason	No of Shares	% of total shares of the Company	
				20/4/2018	97,010	Transfer	35,214,951	7.28%	
				27/4/2018	48,758	Transfer	35,263,709	7.29%	
				4/5/2018	10,096	Transfer	35,273,805	7.30%	
				11/5/2018	466	Transfer	35,274,271	7.30%	
				25/5/2018	656,505	Transfer	35,930,776	7.43%	
				25/5/2018	-144	Transfer	35,930,632	7.43%	
				8/6/2018	457,223	Transfer	36,387,855	7.53%	
				22/6/2018	167,893	Transfer	36,555,748	7.56%	
				22/6/2018	-4	Transfer	36,555,744	7.56%	
				29/6/2018	1,529,798	Transfer	38,085,542	7.88%	
				13/7/2018	4035	Transfer	38,089,577	7.88%	
				27/7/2018	711	Transfer	38,090,288	7.88%	
				27/7/2018	-144	Transfer	38,090,144	7.88%	
				24/8/2018	320,000	Transfer	38,410,144	7.95%	
				31/8/2018	3,109,789	Transfer	41,519,933	8.59%	
				21/9/2018	2379	Transfer	41,522,312	8.59%	
				28/9/2018	700,227	Transfer	42,222,539	8.73%	
				28/9/2018	-3	Transfer	42,222,536	8.73%	
				5/10/2018	21,343	Transfer	42,243,879	8.74%	
				12/10/2018	303,153	Transfer	42,547,032	8.80%	
				19/10/2018	15,187	Transfer	42,562,219	8.80%	
				26/10/2018	70,000	Transfer	42,632,219	8.82%	
				2/11/2018	171,033	Transfer	42,803,252	8.85%	
				30/11/2018	499,270	Transfer	43,302,522	8.96%	
				28/12/2018	-2	Transfer	43,302,520	8.96%	
				18/1/2019	5471	Transfer	43,307,991	8.96%	
				25/1/2019	12,868	Transfer	43,320,859	8.96%	
				1/2/2019	9324	Transfer	43,330,183	8.96%	
				8/2/2019	200,000	Transfer	43,530,183	9.00%	
				22/2/2019	-55,268	Transfer	43,474,915	8.99%	
				22/3/2019	-766,935	Transfer	42,707,980	8.83%	
				29/3/2019	-279,554	Transfer	42,428,426	8.78%	
	Closing Bal			30/3/2019			42,428,426	8.78%	
2	HDFC Trustee Company Ltd- HDFC Infrastructure Fund	29,913,819	6.19%				29,913,819	6.19%	
				11/5/2018	200,570	Transfer	30,114,389	6.23%	
				18/5/2018	30,000	Transfer	30,144,389	6.24%	
				29/6/2018	700,000	Transfer	30,844,389	6.38%	
				6/7/2018	3,383,000	Transfer	34,227,389	7.08%	
				13/7/2018	975,000	Transfer	35,202,389	7.28%	
				20/7/2018	500,000	Transfer	35,702,389	7.39%	



# GUJARAT PIPAVAV PORT LTD.

Sr. No	Name of the Shareholder	Shareholdi beginning o	_	Cha	ange in Share (No. of Share			Cumulative Shareholding during the year	
		No of Shares	% of total shares of the Company	Date	Increase/ Decrease in Share holding	Reason	No of Sha	ires	% of total shares of the Company
				3/8/2018	800,000	Transfer	36,507,	889	7.55%
				10/8/2018	342,000	Transfer	36,849,	889	7.62%
				31/8/2018	2,950,000	Transfer	39,799,	889	8.23%
				7/9/2018	500,000	Transfer	40,299,	889	8.34%
				14/9/2018	1,000,000	Transfer	41,299,	889	8.54%
				28/9/2018	1,250,000	Transfer	42,549,	889	8.80%
				5/10/2018	710,000	Transfer	43,259,	889	8.95%
				19/10/2018	41,500	Transfer	43,301,	389	8.96%
				26/10/2018	150,000	Transfer	43,451,	389	8.99%
	Closing Bal			30/3/2019			43,451,	389	8.99%
3	Matthews Asia Dividend Fund	21,381,946	4.42%				21,381,	946	4.42%
				31/8/2018	-3,682,464	Transfer	17,699,	482	3.66%
				7/9/2018	-444,994	Transfer	17,254,	488	3.57%
				14/9/2018	-902,931	Transfer	16,351,	557	3.38%
				21/9/2018	-361,008	Transfer	15,990,	549	3.31%
				28/9/2018	-1,144,172	Transfer	14,846,	377	3.07%
				5/10/2018	-866,385	Transfer	13,979,	992	2.89%
				12/10/2018	-24,180	Transfer	13,955,	812	2.89%
				19/10/2018	-133,980	Transfer	13,821,	832	2.86%
				26/10/2018	-1,238,820	Transfer	12,583,	012	2.60%
				2/11/2018	-277,148	Transfer	12,305,	864	2.55%
				9/11/2018	-32,372	Transfer	12,273,	492	2.54%
				16/11/2018	-100,948	Transfer	12,172,	544	2.52%
				23/11/2018	-45,794	Transfer	12,126,	750	2.51%
				30/11/2018	-604,031	Transfer	11,522,	719	2.38%
				7/12/2018	-461,813	Transfer	11,060,	906	2.29%
				14/12/2018	-213,569	Transfer	10,847,	337	2.24%
				21/12/2018	-112,542	Transfer	10,734,	795	2.22%
				28/12/2018	-13,619	Transfer	10,721,	176	2.22%
				4/1/2019	-69,839	Transfer	10,651,	337	2.20%
				11/1/2019	-28,464	Transfer	10,622,	873	2.20%
				18/1/2019	-1,714,136	Transfer	8,908,	737	1.84%
				25/1/2019	-1,121,658	Transfer	7,787,	079	1.61%
				1/2/2019	-927,078	Transfer	6,860,	001	1.42%
				8/2/2019	-1,185,440	Transfer	5,674,	561	1.17%
				15/2/2019	-487,307	Transfer	5,187,	254	1.07%
				22/2/2019	-295,212	Transfer	4,892,	042	1.01%
				1/3/2019	-4,892,042	Transfer		0	0.00%
	Closing Bal		T	30/3/2019	Nil				



Sr. No	Name of the Shareholder	Shareholdi beginning yea	g of the		n Shareholdi of Shares)	ng	Cumul Shareholding yea	during the
		No of Shares	% of total shares of the Company	Date	Increase/ Decrease in Share holding	Reason	No of Shares	% of total shares of the Company
4	Kotak Mahindra (International) Ltd	16,480,233	3.41%				16,480,233	3.41%
				19/10/2018	-32,361	Transfer	r 16,447,872	3.40%
				26/10/2018	-105,341	Transfer	16,342,531	3.38%
				2/11/2018	-42,298	Transfer	16,300,233	3.37%
				16/11/2018	-4596	Transfer	16,295,637	3.37%
				11/1/2019	-48,943	Transfer	16,246,694	3.36%
				18/1/2019	-131,205	Transfer	16,115,489	3.33%
				25/1/2019	-99,278	Transfer	16,016,211	3.31%
				1/2/2019	-36,606	Transfer	15,979,605	3.31%
				8/2/2019	-53,892	Transfer	15,925,713	3.29%
				15/2/2019	-9967	Transfer	15,915,746	3.29%
				22/2/2019	-331,770	Transfer	15,583,976	3.22%
				1/3/2019	-2,978,322	Transfer	12,605,654	2.61%
				8/3/2019	-1,500,000	Transfer	11,105,654	2.30%
				29/3/2019	-11,673	Transfer	11,093,981	2.29%
	Closing Bal			30/3/2019			11,093,981	2.29%
5	Franklin Templeton Mutual Fund	15,654,298	3.24%				15,654,298	3.24%
				6/4/2018	166,164	Transfer	15,820,462	3.27%
				6/4/2018	-585,032	Transfer	15,235,430	3.15%
				13/4/2018	-55,000		<del></del>	3.14%
				20/4/2018	-555,293	Transfer	14,625,137	3.03%
				27/4/2018	-2176			3.02%
				4/5/2018	-205,000		14,417,961	2.98%
				13/7/2018	-2,200,000			2.53%
				27/7/2018	-1,000,000		11,217,961	2.32%
				3/8/2018	-200,000			2.28%
				24/8/2018	+		+	2.20%
				30/11/2018	-920,000			2.10%
				21/12/2018	-250,000			1.95%
				18/1/2019	1,000,000			2.16%
				25/1/2019	400,000	+	<del></del>	2.24%
				1/3/2019	2,470,000	Transfer		2.75%
	Closing Bal			30/3/2019			13,317,961	2.75%
6	HDFC Standard Life Insurance Co Ltd	4,565,417	0.94%				4,565,417	0.94%
				8/6/2018	456,141	Transfer	5,021,558	1.04%
				15/6/2018	36,392	Transfer	5,057,950	1.05%

# GUJARAT PIPAVAV PORT LTD.



Sr. No	Name of the Shareholder	Sharehold beginning			e in Shareho o. of Shares)		Cumul Shareholding yea	during the
		No of Shares	% of total shares of the Company	Date	Increase/ Decrease in Share holding	Reason	No of Shares	% of total shares of the Company
				22/6/2018	7467	Transfer	5,065,417	1.05%
				3/8/2018	24,135	Transfer	5,089,552	1.05%
				10/8/2018	34,153	Transfer	5,123,705	1.06%
				17/8/2018	83,349	Transfer	5,207,054	1.08%
				24/8/2018	976	Transfer	5,208,030	1.08%
				31/8/2018	41,178	Transfer	5,249,208	1.09%
				7/9/2018	16,209	Transfer	5,265,417	1.09%
				21/9/2018	7,468	Transfer	5,272,885	1.09%
				28/9/2018	80,171	Transfer	5,353,056	1.11%
				5/10/2018	112,361	Transfer	5,465,417	1.13%
				2/11/2018	25,000	Transfer	5,490,417	1.14%
				7/12/2018	1,104,825	Transfer	6,595,242	1.36%
				31/12/2018	7122	Transfer	6,602,364	1.37%
				4/1/2019	63,053	Transfer	6,665,417	1.38%
				18/1/2019	400,000	Transfer	7,065,417	1.46%
				15/2/2019	500,000	Transfer	7,565,417	1.56%
	Closing Bal			30/3/2019			7,565,417	1.56%
7	JP Morgan SICAV Investment Company (Mauritius) Ltd	7,549,818	1.56%				7,549,818	1.56%
	Closing Bal						7,549,818	1.56%
8	Axis Mutual Fund	6,973,115	1.44%				6,973,115	1.44%
				6/4/2018	-365,000	Transfer	6,608,115	1.37%
				18/5/2018	-64,757	Transfer	6,543,358	1.35%
				25/5/2018	-676,130	Transfer	5,867,228	1.21%
				1/6/2018	-467,228	Transfer	5,400,000	1.12%
				29/6/2018	-5,400,000	Transfer	0	0.00%
	Closing Bal			30/3/2019	Nil			
9	Eastspring Investments India Equity Open Limited	5,117,763	1.06%				5,117,763	1.06%
				6/7/2018	1,291,470	Transfer	6,409,233	1.33%
				13/7/2018	4419	Transfer	6,413,652	1.33%
				1/3/2019	1,402,384	Transfer	7,816,036	1.62%
				29/3/2019	-931,388	Transfer	6,884,648	1.42%
	Closing Bal						6,884,648	1.42%
10	Vanguard International Explorer Fund	6,724,221	1.39%				6,724,221	1.39%
	Closing Bal						6,724,221	1.39%



### (v) SHAREHOLDING OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

Sr. No.	For each of the Directors and KMP		ng at the beginning the year	Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
1	Mr. Keld Pedersen, Managing Director				
	At the beginning of the year				
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc)				
	At the End of the year				
2	Mr. Santosh Breed, Chief Financial Officer				
	At the beginning of the year	80		80	
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc)				
	At the End of the year	80		80	
3	Mr. Manish Agnihotri, Company Secretary & Compliance Officer				
	At the beginning of the year	5		5	
	Date wise Increase / Decrease in Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus / sweat equity etc)				
	At the End of the year	5		5	

### V. INDEBTEDNESS:

Indebtedness of the Company including interest outstanding/accrued but not due for payment.

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of	NIL	NIL	NIL	NIL
the financial year				
i) Principal Amount				
ii) Interest due but not paid				
iii) Interest accrued but not due				
Total (i+ii+iii)				
Change in Indebtedness during				
the financial year				
Addition				
Reduction				
Net Change				
Indebtedness at the end of the financial year	NIL	NIL	NIL	NIL
i) Principal Amount				
ii) Interest due but not paid				
iii) Interest accrued but not due				
Total (i+ii+iii)				



### VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

### A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

	Particulars of Remuneration	Name of MD/ WTD/ Manager	Total Amount	
		Mr. Keld Pedersen		
1	Gross salary			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	Rs. 10.34 Mn	Rs. 10.34 Mn	
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	Rs. 46.12 Mn	Rs. 46.12 Mn	
	(c) Profits in lieu of salary under section 17(3) Income-tax	Nil	Nil	
	Act, 1961			
2	Stock Option	Nil	Nil	
3	Sweat Equity	Nil	Nil	
4	Commission	Nil	Nil	
	- as % of profit			
	- others, specify			
5	Others, please specify -Performance Bonus	Rs. 10.89 Mn	Rs. 10.89 Mn	
	Total (A)	Rs. 67.35 Mn	Rs. 67.35 Mn	
	Ceiling as per the Act	Rs. 102.81 Mn	Rs. 102.81 Mn	

### B. Remuneration to Other Directors:

Particulars of Remuneration	Name of Director			Total Amount			
1. Independent Directors							
	Mr. Tejpreet Singh Chopra	Ms. Hina Shah	Mr. Pradeep Mallick	Mr. Pravin Laheri, IAS (Retd.)			
Fee for attending board / committee meetings	Rs. 600,000	Rs. 950,000	Rs. 1,000,000	Rs. 1,100,000	Rs. 3,650,000		
Commission	Rs. 1,500,000	Rs. 750,000	Rs. 750,000	Rs. 750,000	Rs. 3,750,000		
Others, please specify							
Total (1)	Rs. 2,100,000	Rs. 1,700,000	Rs. 1,750,000	Rs. 1,850,000	Rs. 7,400,000		
2. Other Non-Executive Dire	ctors						
	Mr. Jan Damgaard Sorensen*	Mr. David Skov	Mr. Julian Bevis	Mr. Mukesh Kumar, IAS*			
Fee for attending board / committee meetings	Nil	Nil	Nil	Nil			
Commission	Nil	Nil	Nil	Nil			
Others, please specify	Nil	Nil	Nil	Nil			
Total (2)	Nil	Nil	Nil	Nil			
Total (B)=(1+2)	Rs. 2,100,000	Rs. 1,700,000	Rs. 1,750,000	Rs. 1,850,000	Rs. 7,400,000		
Total Managerial Remuneration	Rs. 2,100,000	Rs. 1,700,000	Rs. 1,750,000	Rs. 1,850,000	Rs. 7,400,000		
Overall Ceiling as per the Act			·		Rs. 20,560,000		

<sup>\*</sup>Held Directorship for part of the year



### C. Remuneration to Key Managerial Personnel Other than Managing Director/Manager/Whole time Director:

	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary	CFO	Total
1	Gross salary				
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NA	Rs. 5.59 Mn	Rs. 7.53 Mn	Rs. 13.12 Mn
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961		NA	NA	NA
	(c) Profits in lieu of salary under section 17(3)		NA	NA	NA
	Income tax Act, 1961				
2	Stock Option		NA	NA	NA
3	Sweat Equity		NA	NA	NA
4	Commission		NA	NA	NA
	- as % of profit				
	- others, specify				
5	Others, please Specify- Bonus		Rs. 1.11 Mn	Rs. 2.00 Mn	Rs. 3.11 Mn
	Total		Rs. 6.70 Mn	Rs. 9.53 Mn	Rs. 16.23 Mn

### PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Туре	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD /NCLT/ COURT]	Appeal made, if any (give Details)		
A. COMPANY							
Penalty	NIL	NIL	NIL	NIL	NIL		
Punishment	NIL	NIL	NIL	NIL	NIL		
Compounding	NIL	NIL	NIL	NIL	NIL		
B. DIRECTORS							
Penalty	NIL	NIL	NIL	NIL	NIL		
Punishment	NIL	NIL	NIL	NIL	NIL		
Compounding	NIL	NIL	NIL	NIL	NIL		
C. OTHER OFFICERS IN DEFAULT							
Penalty	NIL	NIL	NIL	NIL	NIL		
Punishment	NIL	NIL	NIL	NIL	NIL		
Compounding	NIL	NIL	NIL	NIL	NIL		