

**SEEPZ SPECIAL ECONOMIC ZONE
ANDHERI (EAST), MUMBAI.**

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**AGENDA FOR
MEETING OF THE APPROVAL COMMITTEE FOR
SECTOR SPECIFIC SPECIAL ECONOMIC ZONE FOR
IT/ITES AT PUNE OF M/S. EON KHARADI
INFRASTRUCTURE PVT. LTD.-SEZ, PHASE I.**

DATE : 12.09.2025

TIME : 11.00 AM

**MEETING OF THE APPROVAL COMMITTEE FOR
SECTOR SPECIFIC SPECIAL ECONOMIC ZONE FOR
IT/ITES AT PUNE, UNDER THE CHAIRMANSHIP OF
DEVELOPMENT COMMISSIONER, SEEPZ-SEZ ON
12.09.2025**

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Agenda Item No.	Subject
Agenda Item No. 01 :-	Confirmation of the Minutes of the meeting held on 29.07.2025
Agenda Item No. 02 :-	Action taken report for the Minutes of the meeting held on 29.07.2025
Agenda Item No. 03 :-	Monitoring of Performance of M/s. Virtusa Consulting Services Pvt. Ltd
Agenda Item No. 04: -	Application for approval of Change in Board of Directors and Change in Shareholding pattern of the Company in r/o M/s. S G Analytics Pvt. Ltd. Unit-I
Agenda Item No. 05:	Application for approval of Change in Board of Directors and Change in Shareholding pattern of the Company in r/o M/s. S G Analytics Pvt. Ltd. Unit-II

मैसर्स ईओएन खराडी इंफ्रास्ट्रक्चर प्रा. लिमिटेड-चरण- I एसईजेड, खराडी, पुणे, के आईटी-आईटीईएस सेक्टर के विशिष्ट विशेष आर्थिक क्षेत्र के लिए क्षेत्रीय विकास आयुक्त सीपूज-एसईजेड, मुंबई की अध्यक्षता में 29.07.2025 को आयोजित अनुमोदन समिति की 129 वीं बैठक का विवरण।		
1	एसईजेड का नाम	मैसर्स.ईओएन खराडी इंफ्रास्ट्रक्चर प्रा. लिमिटेड-एसईजेड, चरण I
2	क्षेत्र	आईटी/आईटीईएस
3	मीटिंग नं	129 वी
4	तारीख	29.07.2025

उपस्थित सदस्य:

क्र.	नाम और पदनाम (एस/श्री.)	विभाग
1	श्रीमती मितल हिरेमठ संयुक्त विकास आयुक्त	पुणे क्लस्टर एसईजेड, पुणे
2	श्री अभिनव राठी उप आयुक्त, आयकर विभाग	आयकर विभाग से नामित
3	श्री संजीव पाटिल, उद्योग अधिकारी	महाराष्ट्र सरकार से नामित
4	श्री. मंचक जाधव, उप-क्षेत्रीय अधिकारी	महाराष्ट्र प्रदूषण नियंत्रण बोर्ड से नामित
5	श्रीमती पुष्पा गंगावणे, एफटीडीओ	पुणे डीजीएफटी विभाग से नामित
6	श्री प्रशांत रोहणेकर, अधीक्षक	सीमा शुल्क विभाग पुणे नामित

विशेष आमंत्रित :

क्र.	नाम एवं पदनाम(श्री/ श्रीमती)	विभाग
1	श्री. शम्भू दयाल मीना, विनिर्दिष्ट अधिकारी	सीपूज-एसईजेड, पुणे क्लस्टर

एजेंडा आइटम नंबर 01: दिनांक 30.06.2025 को आयोजित 128 वीं बैठक के कार्यवृत्त की पुष्टि

विचारविमर्श के बाद, समिति ने 30.06.2025 को आयोजित अनुमोदन समिति की 128 वीं बैठक के कार्यवृत्त की पुष्टि की।

एजेंडा आइटम नंबर 02: 30.06.2025 को आयोजित बैठक के कार्यवृत्त के लिए की गई कार्रवाई रिपोर्ट।

विचार-विमर्श के बाद, समिति ने 30.06.2025 को आयोजित बैठक के लिए की गई कार्रवाई रिपोर्ट नोट की है।

एजेंडा विषय क्र 03: मैसर्स यूपीएस लॉजिस्टिक्स प्राइवेट लिमिटेड के प्रदर्शन की निगरानी

विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, इकाई के दूसरे ब्लॉक के अंतिम दो वर्ष अर्थात वित्त वर्ष 2024-25 और 2025-26 में प्रदर्शन को नोट किया।

- इकाई ने द्वितीय ब्लॉक अवधि के अंतिम 2 वर्षों अर्थात् वित्त वर्ष 2024-25 और वित्त वर्ष 2025-26 में 114.09 करोड़ रुपये के अनुमानित निर्यात की तुलना में 56.21 करोड़ रुपये का निर्यात राजस्व प्राप्त किया है।
- इकाई ने संचयी आधार पर द्वितीय ब्लॉक अवधि के दूसरे वर्ष में 204.05 करोड़ रुपये अर्थात 95.92% का सकारात्मक एनएफई प्राप्त किया है।

एजेंडा विषय क्र 04: मैसर्स ग्लोबल एडवर्टाइजिंग सर्विसेज प्राइवेट लिमिटेड के प्रदर्शन की निगरानी

विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, इकाई के तीसरे ब्लॉक अवधि के पाँचवें वर्ष अर्थात वित्त वर्ष 2024-25 और चौथे ब्लॉक अवधि के पहले वर्ष अर्थात वित्त वर्ष 2025-26 में प्रदर्शन को नोट किया।

- इकाई ने तीसरे ब्लॉक अवधि के अंतिम वर्ष अर्थात वित्त वर्ष 2024-25 में संचयी आधार पर 72.39 करोड़ रुपये के अनुमानित निर्यात की तुलना में 84.28 करोड़ रुपये का निर्यात राजस्व प्राप्त किया है और 434.11 करोड़ रुपये का सकारात्मक एनएफई प्राप्त किया है।
- इकाई ने चौथे ब्लॉक अवधि के पहले वर्ष अर्थात वित्त वर्ष 2025-26 (जून 2025 तक) में संचयी आधार पर 80.64 करोड़ रुपये के अनुमानित निर्यात की तुलना में 17.79 करोड़ रुपये का निर्यात राजस्व प्राप्त किया है और 16.53 करोड़ रुपये का सकारात्मक एनएफई प्राप्त किया है।
- इकाई ने 602 कर्मचारियों (पुरुष-422, महिला-180) को रोजगार प्रदान किया है।

एजेंडा विषय क्र 05: मेसर्स एलटीआईमाइंडट्री लिमिटेड के निदेशक मंडल में परिवर्तन:-

विचार-विमर्श के बाद समिति ने एमओसीआई द्वारा जारी दिनांक 18.10.2021 के निर्देश संख्या 109 के अनुसार निदेशक मंडल में परिवर्तन के लिए इकाई के प्रस्ताव को मंजूरी दे दी, जिसका विवरण नीचे दिया गया है:

निदेशक मंडल की प्रस्तावित सूची:

क्रमांक	निदेशक का नाम	पदनाम
1.	श्री शेखरीपुरम नारायणन सुब्रह्मण्यन	गैर-कार्यकारी अध्यक्ष
2.	श्री वेणुगोपाल लाम्बू	सीईओ और प्रबंध निदेशक
3.	श्री राममूर्ति शंकर रमन	गैर-कार्यकारी निदेशक
4.	श्री नचिकेत देशपांडे	अध्यक्ष - वैश्विक एआई सेवाएँ, रणनीतिक सौदे और साझेदारियाँ और पूर्णकालिक निदेशक
5.	श्री संजीव आगा	स्वतंत्र निदेशक
6.	श्री जेम्स वर्गीस अब्राहम	स्वतंत्र निदेशक
7.	श्री विनायक चटर्जी	स्वतंत्र निदेशक
8.	सुश्री अपूर्वा पुरोहित	स्वतंत्र निदेशक
9.	श्री बिजौ कुरियन	स्वतंत्र निदेशक
10.	श्री चंद्रशेखरन रामकृष्णन	स्वतंत्र निदेशक

यह अनुमोदन वाणिज्य एवं उद्योग मंत्रालय द्वारा जारी निर्देश संख्या 109 में निर्धारित शर्तों के अधीन है।

अध्यक्ष को धन्यवाद ज्ञापन के साथ बैठक समाप्त हुई।

Minutes of the 129th Meeting of the Approval Committee held under the Chairmanship of Zonal Development Commissioner SEEPZ-SEZ, Mumbai for Sector Specific Special Economic Zone for IT/ITES of M/s. EON Kharadi Infrastructure Pvt. Ltd.–Phase-I SEZ, Kharadi, Pune, held on 29.07.2025.

1	Name of the SEZ	M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase I
2	Sector	IT/ITES
3	Meeting No.	129th Meeting
4	Date	29.07.2025

Members present:

Sr No.	Name and Designation(S/Shri.)	Department
1	Smt. Mital Hiremath Jt. Development Commissioner	Pune Cluster SEZ, Pune
2	Shri. Abhinav Rathi Dy. Commissioner, IT	Nominee of Income Tax, Pune
3	Shri. Sanjiv Patil, Industries Officer	Nominee of Govt. of Maharashtra

4	Shri. Manchak Jadhav Sub-Regional Officer	Nominee of Maharashtra Pollution Control Board
5	Smt. Pushpa Gangawane. FTDO	Nominee of DGFT, Pune
6	Shri. Prashant Rohnekar Superintendent	Nominee of Customs, Pune

Special Invitee:

Sr	Name and Designation	Department
1	Shri. Shambhu Dayal Meena Specified Officer	SEEPZ-SEZ, Pune Cluster

Agenda Item No.01: Confirmation of the Minutes of the 128th meeting held on 30.06.2025

After deliberation, the Committee confirmed the minutes of the 128th meeting of Approval Committee held on 30.06.2025.

Agenda Item No.02: Action taken report for the minutes of the meeting held on 30.06.2025.

After deliberation, the Committee has noted the Action taken report for the meeting held on 30.06.2025.

Agenda Item No.03: Monitoring of Performance for M/s. UPS Logistics Pvt. Ltd.

After deliberation, the committee noted the performance of the unit for 2 years of 2nd Block Period i.e. FY 2024-25 and FY 2025-26 in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of **Rs. 56.21 Crores** as against the projected export of **Rs. 114.09 Crores** in the last 2 years of 2nd Block period i.e. FY 2024-25 and FY 2025-26.
- The unit has achieved positive NFE of Rs. **204.05 Crores** i.e. **95.92%** in 2nd Block period on cumulative basis.

Agenda Item No.04: Monitoring of Performance for M/s. Global Advertisement Services Pvt. Ltd.

After deliberation, the committee noted the performance of the unit for last year of 3rd Block Period i.e. FY 2024-25 and 1st year of 4th Block period i.e. FY 2025-26 in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of Rs. 84.28 Crores as against the projected export of Rs. 72.39 Crores and achieved positive NFE of Rs. 434.11 Crores which is 95.60 % on cumulative basis in Last year of 3rd Block period i.e. FY 2024-25.
- The Unit has achieved export revenue of Rs. 17.79 Crores as against the projected export of Rs. 80.64 Crores and achieved positive NFE of Rs. 16.53 Crores which is 92.92% on cumulative basis in first Year of 4th Block Period i.e. FY 2025-26(Up to June 2025).
- The unit has achieved employment of 602 employees (Men-422, Women-180)

Agenda Item No.5: Change in Board of Directors of M/s. LTIMindtree Ltd.

After deliberation, the Committee approved the proposal for Change in Board of Directors in terms of Instruction No. 109 dated 18.10.2021, issued by MOC&I.

Approved List of Board of Directors:

Sr. No.	Name of Director	Designation
1.	Mr. Sekharipuram Narayanan Subrahmanyam	Non-Executive Vice Chairman
2.	Mr. Ramamurthi Shankar Raman	Non-Executive Director
3.	Mr. Venugopal Lambu	CEO-Designate and Whole time Director

4.	Mr. Nachiket Deshpande	President-Global AI Services, strategic deals and Partnerships and Whole time Director
5.	Sanjeev Aga	Independent Director
6.	Mr. James Varghese Abraham	Independent Director
7.	Mr. Vinayak Chatterjee	Independent Director
8.	Ms. Apurva Purohit	Independent Director
9.	Mr. Bijou Kurien	Independent Director
10.	Mr. Chandrasekaran Ramakrishnan	Independent Director

Meeting ended with a vote of thanks to the Chair.

(ज्ञानेश्वर बी. पाटील, आईएस)
 (Dnyaneshwar B. Patil, IAS)
 अध्यक्ष एवं विकास आयुक्त
Chairman-cum- Development Commissioner

Mr. Dnyaneshwar B Patil
 Development Commissioner
 PUNE- SEZ

Action Taken for Approval Committee held on 29-07-2025

Agenda Item No.	Subject	Remarks
Agenda Item No. 01	Confirmation of the Minutes of the 128th Meeting held on 30-06-2025	After deliberation, the Committee confirms the minutes of the meeting held on 30.06.2025
Agenda Item No. 02	Application for change in list of directors/ partners(M/s. LTIMindtree Ltd)	Approval letter is issued to the Unit on 19.08.2025
Agenda Item No. 03	Application for Monitoring of Performance(M/s. UPS Logistics Pvt. Ltd)	Approval letter is issued to the Unit on 19.08.2025
Agenda Item No. 04	Application for Monitoring of Performance(M/s. Global Advertisement Services Pvt. Ltd)	Approval letter is issued to the Unit on 18.08.2025

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Monitoring of the performance of M/s. Virtusa Consulting Services Pvt. Ltd, an IT/ITERS unit located in EON Kharadi Phase I-SEZ, Pune, for monitoring of performance for the period of five years for 3rd Block Period.

b. Specific Issue on which decision of AC is required: -

Monitoring of the performance of the unit for 3rd Block period i.e. FY 2020-21 to FY 2024-25 in terms of Rule 54 of SEZ Rules, 2006.

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

Rule 54 of SEZ Rules, 2006 "Performance of the Unit shall be monitored by the Approval Committee as per the guidelines given in Annexure appended to these rules"

d. Other Information: -

Approved Revised Projection (After Post Merger)

(Rs. in Cr.)

	2020-21	2021-22	2022-23	2023-24	2024-25	TOTAL
FOB Export	33.74	37.88	37.79	38.09	39.74	187.24
FE Outgo	6.28	6.87	8.02	6.28	3.50	30.95
NFE	27.46	31.01	29.77	31.81	36.24	156.29

Performance as compared to projections:

(Rs. In Cr.)

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	Actual
2020-21	33.74	43.97	0.00	0.00	18.12	3.80	0.42
2021-22	37.88	99.77	0.00	0.00		1.84	2.51
2022-23	37.79	148.11	0.00	0.00		4.96	3.67
2023-24	38.09	302.23	0.00	0.00		0.94	2.59
2024-25	39.74	307.63	0.00	0.00		0.90	3.19
Total	187.24	901.72	0.00	0.00	18.12	12.44	12.38

Cumulative NFE achieved:

(Rs. in Cr)

Year		
	Cumulative NFE Achieved	Cumulative % NFE Achieved

2020-21	42.25	96.06 %
2021-22	138.25	96.18%
2022-23	281.20	96.35%
2023-24	579.26	97.50%
2024-25	882.03	97.82%

Employment Achievement (Direct):

	Approved	Achieved
Men	477	799
Women	264	335
Total	741	1134

LOA No. & Date		SEZ/PUNE/2U/2010-11/6873 dated 30.04.2010
Location of Unit		Unit 502, Wing No.3, Cluster, 5 th Floor, Plot No.1, Survey No. 77,EON Free Zone, MIDC Kharadi Knowledge Park, Pune-411014.
Validity of LOA		19.08.2025
Item(s) of manufacture/ Services		IT & ITES
Date of commencement of production		20.08.2020
Execution of BLUT		Rs. 19.02 Crores
Outstanding Rent dues		NA
Labour Dues		NA
Validity of Lease Agreement		-
Pending CRA Objection, if any		NA
Pending Show Cause Notice/ Eviction Order/Recovery Notice/ Recovery Order issued, if any		NA
Projected employment for the block period		1134 (Men-799, Women-335)
No. of employees as on 31.03.2025		
Area allotted (in sq. ft.)		59055 Sq. ft.
Area available for each employee per sq.ft. basis (area / no. of employees)		52 Sq. ft.
Investment till date	Building	-
	Plant & Machinery	24.77
Quantity and value of goods exported under Rule 34 (unutilized goods)		NA
Value Addition during the monitoring period		NA
Whether all the APRs being considered now has been filed well within the time limit, or otherwise.		Yes
If no, details of the Year along with no of days delayed to be given.		

The Specified Officer report vide letter dated 22.08.2025 has reported as detailed below:

EXPORT (Rs. In Cr)

Year/ Period	Figures reported APR	Figures as per in Softex/ Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21	43.97	43.93	0.04	The difference is due to Exchange Rate
2021-22	99.77	99.45	0.32	
2022-23	148.11	148.26	-0.15	
2023-24	302.23	299.75	2.48	
2024-25	307.63	305.10	2.53	

IMPORT

(Capital Goods including procurement done on IUT (from SEZ, EOU, STPI, EHTP) basis.)(Rs. In Cr)

Year/Period	Figures reported APR (FOB Value)	Figures as in per Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21	3.80	3.18	0.62	Differences Due to Loan Basis/Rental Bill of Entry value (Rs. 0.62) wrongly considered in APR value reported.
2021-22	12.52	1.09	11.43	As per APR format the value reported is Cumulative Value, i.e, Total Value of Currently Existing Capital Goods Imported for the past 10 years (incl. this year). And the Actual Import Procurement is of Rs 1.09 Crores as per CUSTOMS Records for the Year. Other difference is due to Cumulative value reported.
2022-23	14.96	2.54	12.42	As per APR format the value reported is Cumulative Value, i.e, Total Value of Currently Existing Capital Goods Imported for the past 10 years (incl. this year). And the Actual Import Procurement is of Rs 2.54 Crores as per CUSTOMS Records for the Year. Other difference is due to Cumulative value reported.

2023-24	15.89	0.94	14.95	<p>As per APR format the value reported is Cumulative Value, i.e, Total Value of Currently Existing Capital Goods Imported for the past 10 years (incl. this year).</p> <p>And the Actual Import Procurement is of Rs 0.94 Crores as per CUSTOMS Records for the Year.</p> <p>Other difference is due to Cumulative value reported.</p>
2024-25	16.67	1.04	15.63	<p>As per APR format the value reported is Cumulative Value, i.e, Total Value of Currently Existing Capital Goods Imported for the past 10 years (incl. this year).</p> <p>And the Actual Import Procurement is of Rs 1.04 Crores as per CUSTOMS Records for the Year.</p> <p>Other difference is due to Cumulative value reported.</p>

Raw Material

(Rs. In Cr)

Year/Period	Figures reported in APR (FOB Value)	Figures as per Customs Records	Difference if any	Reason for Difference/Remark
(1)	(2)	(3)	(4)	(5)
2020-21				
To	0.00	0.00	0.00	--
2024-25				

BLUT (Rs in Cr)

1	Value of BLUT Executed (Duty foregone) (including for CG/ Raw Material/ Services)		
	Value of Additional BLUT executed	Date of Acceptance	BLUT Amount
		01.03.2021	19.02
	<ul style="list-style-type: none">• Year: Date of acceptance• BLUT amount:	Total	19.02
	TOTAL value of BLUT Executed		

2	Total Duty Foregone on goods & services procured	FY	Goods Imported & Indigenous	Services Imported & Indigenous
	Category Wise:	2020-21	71.12	0.00
		2021-22	64.14	0.00
		2022-23	59.88	13.39
		2023-24	19.59	136.36
	Year Wise:	2024-25	25.60	216.57
		Total	240.33	366.32
(d)	Employment made as on date (31.03.2025) (as on end of block period/ year up to which monitoring is being done)	Men: 799 Women: 335 Total No Employment: 1134 The same has been verified from their Online MPR.		
(e)	Details of Pending Foreign Remittance beyond Permissible period, if any (as on 31.03.2025) To cross-check the same and verify whether necessary permission from AD Bank/ RBI has been obtained.	No foreign remittance is pending as on 31.03.2025		
(f)	Whether all Softex has been filed for the said period. If no, details thereof. SO to also check whether unit has obtained Softex condonation from DC office / RBI and if approved, whether they have filed such pending Softex.	Yes		
(g)	Whether all Softex has been certified, if so till which month has the same been certified. If not, provide details of the Softex and reasons for pendency.	All Softex have been certified till 31-03-2025		
(h)	Whether unit has filed any request for Cancellation of softex	No		
(i)	Whether any Services provided in DTA/SEZ/EOU/STPI etc. against payment in INR in r/o IT/ITES Unit during the period. If yes, details thereof (year wise details to be provided)	No		
(j)	SO to verify and certify whether the unit has updated the BLUT ledger Module in SEZ Online.	NA		

(k)	<p>Has the unit cleared any Capital Goods procured duty free in DTA against Payment of Duty, or otherwise?</p> <p>Full details to be provided along with value of assets and duty discharged</p>	No
(l)	<p>Is the unit sharing any of their infrastructure with other units or are utilizing infrastructure of another unit in the same or other SEZ.</p> <p>If so, details thereof, including the details of the unit with whom the sharing is being made, and the payment terms</p> <p>If approval for sharing of common infrastructure has been obtained from UAC/DC office, the date of UAC/ Approval letter to be indicated</p>	No
(m)	<p>Whether all DSPF for services procured during the said monitoring period under consideration has been filed by the unit and whether the same has been processed for approval by the SO Office.</p>	Yes, and some are under process
(n)	<p>Whether unit has filed all DTA procurement w.r.t. the goods procured by them during the monitoring period for the relevant period:</p> <p>If no, details thereof</p>	Yes
(o)	<p>Details of the request IDs pending for OOC in respect of DTA procurement on the date of submission of monitoring report</p>	No
(p)	<p>Has the unit set up any cafeteria/ canteen/ food court in unit premises.</p> <p>If yes, whether permission from UAC/DC office has been issued, or otherwise.</p> <p>Whether unit has availed any duty paid goods/services for setting up such facility?</p> <p>If yes, whether unit has discharged such duty/ tax benefit availed? details to be given including amount of duty/ tax recovered or yet to be recovered</p>	No
(q)	<p>Whether any violation of any of the provisions of law has been noticed/ observed by the Specified Officer during the period under monitoring.</p>	NA

e. **Recommendation:**

- The Unit has achieved export revenue of **Rs. 901.72 Crores** as against the projected export of **Rs 187.24 Crores** and achieved positive NFE of **Rs. 882. 03 Crores** which is 97.82 % on cumulative basis in 5 Years of 3rd Block Period i.e. 2020-21 to FY 2024-25.
- As per SO report the unit has achieved employment of **1134** employees (Men-799, Women-335)
- The Unit is required to revise the APRs to during FY 2020-21 to 2024-25.
- Approval committee may kindly monitor the performance of the Unit for 5 Years of 3rd Block Period i.e. FY 2020-21 to FY 2024-25., in terms of Rule 54 of SEZ Rules, 2006. in terms of Rule 54 of SEZ Rules, 2006.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 21.07.2025 submitted on 28.07.2025 by M/s. S G Analytics Pvt. Ltd. Unit-I, IT/ITES unit located in M/s. EON Kharadi Infrastructure Pvt. Ltd- SEZ, Phase-I for Change in Board of Directors and Change in Shareholding pattern of the Company.

b. Specific Issue on which decision of AC is required: -

Approval of the Approval Committee for Change in Board of Directors and Change in Shareholding pattern of the Company in terms of Instruction No. 109 dated 18.10.2021, as detailed below:

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
Notification :-**

As per para (i) of Instruction no. 109, dated 18.10.2021,

“Reorganization including change of name, Change of Shareholding pattern, business transfer arrangements, court approved mergers and demergers, change of constitution, Change of Directors, etc. may be undertaken by the Unit Approval Committee (UAC) concerned subject to the condition that the Developer/Co-developer/ Unit shall not opt out or exit out of the Special Economic Zone and continues to operate as a going concern. All liabilities of the Developer/Co-Developer/Unit shall remain unchanged on such reorganization.” ...

d. Other Information: -

Change in Board of Directors

Previous List of Board of Directors:

Name of Director	Designation	Date of Cessation
Sushant Gupta	Director	17.06.2025
Parminder Kaur	Director	17.06.2025

Proposed List of Board of Directors:

Name of Director	Designation	Date of Appointment
Ankor Rai	Director	17.06.2025
Bharadwaj Rangarao Manju	Director	17.06.2025
Namit Sureka Vishnu	Director	17.06.2025

Reason for Change in Board of Directors:

The unit has submitted that, due to the cessation of existing directors and appointment of new director there is Change in Board of Directors.

Change in Shareholding Pattern:

Existing Shareholding Pattern of the Company:

Sr. No.	Name of the Shareholders	No. of. Shares	Value of Shares (In Rs.) (Face Value Rs. 1.00/- per share)	% of Shareholding
1.	Sushant Gupta	5,74,325	5,74,325	69.257%
2.	Parminder Kaur	1,10,775	1,10,775	13.358%
3.	Ahmed Hakki	58,180	58,180	7.016%
4.	Simran Wadhwa	31,763	31,763	3.830%
5.	Shankar Iyer	12,365	12,365	1.491%
6.	Vineet Kumar Agarwal	11,585	11,585	1.397%
7.	Richard Weatherstone	7,090	7,090	0.855%
8.	Ankit Maheshwari	6,725	6,725	0.811%
9.	Siddharto Banerjee	5,510	5,510	0.664%
10.	James T Decicco III	2,888	2,888	0.348%
11.	Jayaprakash M.	2,106	2,106	0.254%
12.	Ripun Jai Mehta	1,768	1,768	0.213%
13.	Umed Padghan (Patil)	803	803	0.097%
14.	Parth Arora	447	447	0.054%
15.	Parth Arora	353	353	0.043%
16.	Steve Salvius	667	667	0.080%
17.	Sabyasachi Guha Raja	401	401	0.048%
18.	Mayuresh Wagh	400	400	0.048%
19.	Rohit Ratkal	201	201	0.024%
20.	Sonal Mamtore	200	200	0.024%
21.	Rajib Das	200	200	0.024%
22.	Sirish Kumar Pammi	199	199	0.024%
23.	Ashish Kumar Jain	132	132	0.016%
24.	Ravi Vitkar	101	101	0.012%
25.	Saurav Bhandari	66	66	0.008%
26.	Arti Saproo	18	18	0.002%
Total		8,29,268	8,29,268	100%

Proposed Shareholding Pattern Post Merger of the Company:

Sr. No.	Name of the Shareholders	No. of. Shares	Value of Shares (In Rs.) (Face Value Rs. 1.00/- per share)	% of Shareholding
1.	Learning Mate Solutions Private Limited	8,29,267	8,29,267	99.9999%
2.	SPI Technologies India Private Limited	1	1	0.0001%
Total		8,29,268	8,29,268	100%

Reason for Change in Shareholding Pattern:

The unit has stated that there is a change in Shareholding pattern due to the transfer of 100% of the paid-up capital of SG Analytics Private Limited to Learning Mate Solutions Private Limited.

Information: -

- M/s.SG Analytics Pvt. Ltd. Unit-I, is located at Unit No 601, 6th Floor, Wing2, Cluster C, M/s. EON Kharadi Infrastructure Pvt. Ltd.-SEZ, Phase-I S. No. 72, Kharadi, Pune-411014.
- DCP: 15.02.2013
- LOA valid till: 14.02.2028
- The Unit has submitted following documents:
 - i. Copy of Board Resolution passed for change in director
 - ii. Copy of form DIR-12 filed with ROC for such change & it's challan
 - iii. Copy of list of directors before and after such change
 - iv. Copy of Resolution Passed for change in shareholding/transfer of share
 - v. Copy of List of shareholders before and after change
 - vi. Copy of form SH-4 reflecting transfer of shares
 - vii. Copy of BENPOS for the Shareholder (where the transfer is done through D mat)
 - viii. Copy of all letter of approval
 - ix. Copy of Undertaking in terms of instruction No.109
 - x. Copy of undertaking personal liability
 - xi. Copy of certificate of incorporation

e. **Recommendation:**

Approval Committee may kindly consider the proposal of the unit for Change in Board of Directors and Change in Shareholding pattern of the Company, in terms of Instruction no. 109 issued by MOC&I.

**GOVERNMENT OF INDIA,
OFFICE OF THE DEVELOPMENT COMMISSIONER,
SEEPZ SPECIAL ECONOMIC ZONE, GOVT. OF INDIA,
ANDHERI (EAST), MUMBAI**

AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 21.07.2025 submitted on 28.07.2025 by M/s. S G Analytics Private Limited. Unit-II, IT/ITES unit located in M/s. EON Kharadi Infrastructure Pvt Ltd- SEZ, Phase-I for Change in Board of Directors and Change in Shareholding pattern of the Company.

b. Specific Issue on which decision of AC is required: -

Approval of the Approval Committee for Change in Board of Directors and Change in Shareholding pattern of the Company in terms of Instruction No. 109 dated 18.10.2021, as detailed below:

**c. Relevant provisions of SEZ Act, 2005 & Rules, 2006/Instruction/
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Total		8,29,268	8,29,268	100%

Reason for Change in Shareholding Pattern:

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Information: -

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- DCP: 27.06.2016
- LOA valid till: 26.06.2026
- The Unit has submitted following documents:

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- iii. Copy of list of directors before and after such change
- iv. Copy of Resolution Passed for change in shareholding/transfer of share
- v. Copy of List of shareholders before and after change
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