

**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. QUBIX BUSINESS PARK PVT.
LTD.-SEZ**

DATE : 16.10.2026

TIME : 04:00 PM

**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
16.10.2026**

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Agenda Item No. 03: -	Application submitted by M/s. Subeno India Private limited for Addition of location with revision in projections
Agenda Item No. 04: -	Application submitted by M/s. Searce Cosourcing Services Pvt. Ltd. for Regularization of Cafeteria
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Agenda Item No. 08: -	Application for Change of Directors submitted by M/s. SubEno India Pvt. Ltd.

मैसर्स क्यूबिक्स बिजनेस पार्क प्राइवेट लिमिटेड- एसईजेड, पुणे के आईटी/आईटीईएस सेक्टर विशिष्ट विशेष आर्थिक क्षेत्र के लिए क्षेत्रीय विकास आयुक्त सीपूज-एसईजेड, मुंबई की अध्यक्षता में, पुणे में दिनांक 04.09.2026 को आयोजित अनुमोदन समिति की 154 वीं बैठक का कार्यवृत्त ।	
एसईजेड का नाम	मैसर्स क्यूबिक्स बिजनेस पार्क प्राइवेट लिमिटेड, एसईजेड
सेक्टर	आईटीआईटीईएस/
बैठक क्रमांक	154 वीं
दिनांक	04.09.2026

उपस्थित सदस्य:

क्र.	नाम एवं पदनाम(श्री/ श्रीमती)	विभाग
1	श्रीमती मितल हिरेमठ, संयुक्त विकास आयुक्त	पुणे क्लस्टर एसईजेड, पुणे
2	श्री. सुनील कुमार, उप आयुक्त, आयकर विभाग	आयकर विभाग से नामित
3	श्री. संजीव पाटिल, उद्योग अधिकारी, पुणे क्षेत्र	महाराष्ट्र सरकार से नामित
4	श्री. प्लेटो लोबो, सहायक विदेश व्यापार महानिदेशक	पुणे डीजीएफटी विभाग से नामित
5	श्रीमती सुषमा कुंभार, क्षेत्रीय अधिकारी	महाराष्ट्र प्रदूषण नियंत्रण बोर्ड से नामित
6	श्री. मुकेश कुमार, अधीक्षक	सीमा शुल्क विभाग, पुणे से नामित

विशेष आमंत्रित:

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

एजेंडा विषय क्र. 01: दिनांक 06.08.2026 को आयोजित 153 वीं बैठक के कार्यवृत्त की पुष्टि ।

विचार-विमर्श के बाद, समिति ने 06.08.2026 को आयोजित अनुमोदन समिति की 153 वीं बैठक के कार्यवृत्त की पुष्टि की।

एजेंडा विषय क्र. 02: दिनांक 06.08.2026 को आयोजित 153 वीं बैठक के संदर्भ में की गयी कार्रवाई की रिपोर्ट ।

विचार-विमर्श के बाद, समिति ने 06.08.2026 को आयोजित अनुमोदन समिति की 153 वीं बैठक के संदर्भ में की गयी कार्रवाई की रिपोर्ट को नोट किया।

एजेंडा विषय क्र. 03: मैसर्स एलीग्राम सिस्टम्स एंड टेक्नोलॉजीज प्राइवेट लिमिटेड द्वारा निदेशक मंडल में परिवर्तन की स्वीकृति हेतु प्रस्तुत आवेदन।

विचार-विमर्श के बाद, समिति ने वाणिज्य एवं उद्योग मंत्रालय (MOC&I) द्वारा जारी निर्देश संख्या 109 दिनांक 18.10.2021 के प्रावधानों के अनुसार मैसर्स एलीग्राम सिस्टम्स एंड टेक्नोलॉजीज प्राइवेट लिमिटेड के निदेशक मंडल में परिवर्तन के प्रस्ताव को अनुमोदित किया, जैसा कि नीचे बताया गया है:

निदेशक मंडल की अनुमोदित सूची:

क्र.	निदेशक का नाम	पद	नियुक्ति की तिथि
1.	जेंस ओहलेंशेगर	निदेशक	29.08.2019
2.	सतीश वाटे	स्वतंत्र निदेशक	13.04.2022
3.	लूथियन सोरिन मनोलाचे	अतिरिक्त निदेशक	17.10.2025
4.	कौशिक चंद्रहास खोना	अतिरिक्त निदेशक	11.05.2026
5.	राहुल सुधाकर जोहरापुरकर	अतिरिक्त निदेशक	11.05.2026

यह अनुमोदन वाणिज्य एवं उद्योग मंत्रालय द्वारा जारी निर्देश संख्या 109 दिनांक 18.10.2021 में निर्धारित शर्तों के अधीन है।

अध्यक्ष को धन्यवाद ज्ञापन के साथ बैठक समाप्त हुई।

Minutes of the 154th 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. Qubix Business Park Pvt. Ltd.-SEZ, Pune, held on 04.09.2026.	
Name of the SEZ	M/s. Qubix Business Park Pvt. Ltd.-SEZ
Sector	IT/ITES
Meeting No.	154 th
Date	04.09.2026

Members present:

Sr No	Name and Designation (Smt./Shri)	Department
1	Smt. Mital Hiremath, Jt. Development Commissioner	Pune Cluster SEZ, Pune
2	Shri. Sunil Kumar, Dy. Commissioner, Income Tax	Nominee of Income Tax, Pune
3	Shri. Sanjiv Patil, Industries Officer, Pune Region	Nominee of Govt. of Maharashtra
4	Shri. Plato Lobo, Asstt. Director General of Foreign Trade	Nominee of DGFT, Pune
5	Smt. Sushma Kumbhar, Field Officer	Nominee of Maharashtra Pollution Control Board
6	Shri. Mukesh Kumar, Superintendent	Nominee of Customs, Pune

Special Invitee:

Sr	Name and Designation (Smt./Shri)	Department
1	Shri. Sachin Patil, Specified Officer	SEEPZ-SEZ, Pune Cluster

Agenda Item No. 01: Confirmation of Minutes of the 153rd meeting held on 06.08.2026.

After deliberation, the Committee confirmed the minutes of the 153rd Approval Committee meeting held on 06.08.2026.

Agenda Item No. 02: Action taken report for the Minutes of the 153rd meeting held on 06.08.2026.

After deliberation, the Committee has noted the Action taken report for the meeting held on 06.08.2026.

Agenda Item No. 03: Application of M/s. Allygram Systems and Technologies Pvt. Ltd. for approval of Change in Board of Directors.

After deliberation, the Committee approved the proposal of **M/s. Allygram Systems and Technologies Pvt. Ltd.** for Change in Board of Directors, in terms of Instruction No. 109 dated 18.10.2021, issued by MOC&I , as detailed below:

Approved List of Board of Directors:

Sr. No.	Name of Director	Designation	Date of Appointment
1.	Jens Ohlenschlager	Director	29.08.2019
2.	Satish Wate	Independent Director	13.04.2022
3.	Lucian Sorin Manolache	Additional Director	17.10.2025
5.	Kaushik Chandrahas Khona	Additional Director	11.05.2026
6.	Rahul Sudhakar Joharapurkar	Additional Director	11.05.2026

The approval is subject to the conditions laid down in Instruction No. 109 dated 18.10.2021 issued by MOC&I.

Meeting ended with a vote of thanks to the Chair.

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

Action Taken for Approval Committee held on 04-09-2026

Agenda Item No.	Subject	Remarks
Agenda Item No. 01	Confirmation of the Minutes of the 153rd Meeting held on 06-08-2026	Minutes of the meeting held on 06.08.2026 confirmed by the Approval Committee.
Agenda Item No. 02	Application for change in list of directors/ partners(M/s. Allygram Systems and Technologies Pvt. Ltd.)	Approval Letter issued to Unit on 23.09.2026

**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 05.10.2026 submitted by M/s. Subeno India Private limited, an IT/ITES unit located in Qubix Business Park Pvt. Ltd.- SEZ for Addition of area with revision in projections.

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

Approval of the Committee in terms of Rule 19(2) of SEZ Rules, 2006 for Addition of area admeasuring 10,120 Sq. ft. with Revision in projections.

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

First Proviso to Rule 19(2) of SEZ Rules, 2006 states that, “*PROVIDED that the Approval Committee may also approve proposals for broad banding, diversification, enhancement of capacity of production, change in the items of manufacture or service activity, if it meets the requirements of rule 18*”.

d. Other Information: -

Location / area proposed to be added :

Existing area	Area proposed to be added	Total area after addition
1 st , 2 nd and 3 rd Floor, IT-2 Building, 5 th Floor, IT-4 Building, Qubix Business Park Pvt. Ltd.-SEZ, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411057	5 th Floor, IT-4 Building, Qubix Business Park Pvt. Ltd.-SEZ, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411057	1 st , 2 nd and 3 rd Floor, IT-2 Building, 5 th Floor, IT-4 Building, Qubix Business Park Pvt. Ltd.-SEZ, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411057
Admeasuring area of 92,892 Sq.ft.	Admeasuring area of 10,120 Sq.ft.	Admeasuring area of 1,03,012 Sq.ft.

Revision in Projections:

Projections of Investment and Employment: (Rs. In Crores)

Sr.No	Item	Existing Projections		Revised Projections	
A	Investment in Capital Goods				
i.	Indigenous Capital Goods	45.00		55.00	
ii.	Imported Capital Goods	60.00		40.00	
	Total	105.00		95.00	
B	Input Services				
i.	Indigenous Services	110.00		134.70	
ii.	Imported Services	20.00		20.00	
	Total	130.00		154.70	
C.	Employment	Men	Women	Men	Women
		800	280	880	320
		1080		1200	
	TOTAL				

Approved Export Projections:**(Rs. In Crores)**

	2026-27	2027-28	2028-29	2029-30	2030-31	TOTAL
FOB value of Exports	221.00	227.63	234.46	241.49	248.74	1173.32
FE Outgo	2.00	2.75	3.75	4.80	5.00	18.30
NFE Earnings	219.00	224.88	230.71	236.69	243.74	1155.02

Proposed Revision in Export Projections:**(Rs. In Crores)**

	2026-27	2027-28	2028-29	2029-30	2030-31	Total
FOB value of Exports	230.00	236.90	241.64	246.47	251.40	1206.41
FE Outgo	14.51	14.89	15.61	6.52	8.47	60.00
NFE Earnings	215.49	222.01	226.03	239.95	242.93	1146.41

Reason for Addition of Location :

The unit has informed that during and post COVID, the Unit operated with limited office space, as many employees opted for hybrid model. The unit is now encouraging more employees to work from the office and are also converting some of its congested seating layout to more 'liberal' layout to improve employee satisfaction. Accordingly, the unit has proposed for this additional operational area to ensure sufficient desk availability to their employees.

The Unit has stated that Oil & Gas industry has slowed compared to FY 2022-23 forecast, and many global project awards are moving towards right. This has relatively reduced demand for the Company services at its global executions centres, resulting in a decrease in NFE amid global business challenges. The unit has informed that the reduction in revenue is cyclical for Oil & Gas industry and they expect more business in future.

Other Information: -

- M/s. Subeno India Private limited, bearing LOA No. SEEPZ/FIPL-SEZ/APSPL/12/2011-12 dated 08.03.2011 (Original LOA) located at 1st, 2nd and 3rd Floor, IT-2 Building and 5th Floor, IT-4 Building, Qubix Business Park Pvt Ltd.-SEZ, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411057.
- Date of Commencement: 15.04.2011
- LOA is valid upto: 14.04.2031

The unit has submitted the following documents with the application:

- i. Letter of Intent signed with SEZ Developer for proposed addition of area
- ii. Copy of LOA
- iii. Copy of Board Resolution
- iv. Copy of Floor plan of the proposed additional area

e. Recommendation:

Approval Committee may kindly consider the proposal submitted by the unit for addition of area to the existing operational area with revision in projections in terms of Rule 19(2) 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 28.07.2026 submitted by M/s. Searce Cosourcing Services Pvt. Ltd. an IT/ITES Unit located at Qubix Business Park Pvt. Ltd.-SEZ, for Regularization of Cafeteria in the SEZ Unit-premises.

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

Approval of the Committee for regularization of the cafeteria for the exclusive use of the employees of the unit located at Qubix Business Park Pvt. Ltd. SEZ, in terms of Instruction No. 95 dated 11.06.2019 read with Rule 11(5) of the SEZ Rules, 2006, as detailed below:

Name of the Vendor	Activity	Location	Area (Sq. Ft.)
Renukas Kitchen	Serving Cooked food	6 th Floor, Zone B, IT-06 Building, Qubix Business Park Pvt. Ltd.-SEZ	1800 Sq. Ft.

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

As per Rule 11 (5) of SEZ Rules, 2006, *“PROVIDED that the Developer may, with the prior approval of the Approval Committee, grant on lease land or built-up space, for creating facilities such as canteen, public telephone booths, first aid centres, creche and such other facilities as may be required for the exclusive use of the Unit.”*

As per the Instruction no. 95 dated 11.06.2019 issued by the MoC&I, *“the BoA in its 84th meeting held on 05.10.2018, had allowed the UAC to decide for setting up a cafeteria subject to necessary statutory NOCs such as fire, health, etc. by the unit.*

Further, the Department has also received requests for granting permission to set up cafeteria, crèche, gymnasium and similar facilities in the premises of the unit for the exclusive use of such units.

3. The issue was examined in this Department and with the approval of competent authority, it is conveyed that the same could be allowed subject to the following conditions.

a. The facilities as envisaged under the proviso to Rule 11(5) of the SEZ Rules could also be created by a unit for its exclusive use subject to obtaining a NOC from the Developer as well as necessary NOCs/ clearances / approvals from the relevant statutory authorities.

b. The units shall not be eligible for any exemptions, drawback, concessions or any other benefit available under Section 7 or Section 26 of the SEZ Act, for creating or operating such facilities.”

d. Other Information: -

M/s. Searce Cosourcing Services Pvt. Ltd. has been granted LOA No. SEEPZ-SEZ/QBPPL-SEZ/SCSPL/78/2019-20/3047 dated 09.03.2020 to operate as an IT/ITES Unit at 6th Floor, Zone A and B, IT-06 Building, Qubix Business Park Pvt. Ltd.-SEZ, Plot No. 2, Blue Ridge Township, Behind Cognizant, Near Rajiv Gandhi Infotech Park, Phase I, Hinjewadi, Pune 411 057.

The unit has submitted that:

- There is no live cooking in the said cafeteria. They have appointed a food vendor i.e. Renukas Kitchen who provides cooked food to them which is service to their employees in the cafeteria.
- They have obtained the NOC from the SEZ Developer for operating the cafeteria in the Units premises.

- The Unit as well as the cafeteria vendor have not availed or claimed any Direct/Indirect Tax benefits under the SEZ scheme for operating and maintaining the cafeteria facility.

Reason for not obtaining prior approval:

The unit has submitted that they have established cafeteria facility without prior approval of the Unit Approval Committee (UAC) due to an inadvertent oversight during the setup (which was done during the pandemic era), with absolutely no intent to bypass regulatory norms. Under their current management, they have implemented strict compliance protocols to ensure all SEZ Rules and Instructions are meticulously adhered to. As part of these focused compliance efforts, they proactively identified this gap and initiated the present application to regularize the facility in full alignment with Instruction No. 95 dated 11.06.2019, read with Rule 11(5) of the SEZ Rules, 2006. The cafeteria has been set up solely for the welfare, health, and convenience of their employees working within the SEZ premises. Therefore, they have requested to condone the procedural delay and grant approval for the cafeteria facility.

Report submitted by the Specified Officer:

The Specified Officer vide their letter dated 08.09.2026, has submitted that,

Sr.No	Particulars	Remarks
1	Whether the unit has availed any exemption/drawback/concession or any other fiscal benefits on the goods or services for setting up/operating the said cafeteria	No
2	Whether the unit has paid all applicable duties/taxes on the goods procured for setting up of the cafeteria	Yes. They have not availed any exemption in respect of capital goods procured for the cafeteria.
3	Whether the unit has complied with the requirements of instruction No. 95 dated 11.6.2019 issued by the DOC, MoC&I	Yes. They have submitted NOC issued by developer i.e. Qubix Business Park Pvt Ltd and further conveyed that they will follow all the procedure and guidelines of the Central Govt., State Govt., local authorities & SEZ authorities.
4	Whether any live cooking activity being carried out in cafeteria premises	No. The unit has appointed a food vendor who prepares the food off-site, and the cooked food is subsequently served to the employees in the cafeteria.
5	Whether any electric equipment is being used in the cafeteria	An electric bain-marie counter is used to keep pre-cooked food warm and serve it to employees in the cafeteria.

The Unit has submitted the following documents with the application:

- Application for regularizing the cafeteria by unit
- Copy of NOC from Developer
- Copy of Floor Map
- Copies of FSSAI Registration, PAN & GST certificate of the Vendor (Renukas Kitchen)
- Copy of Fire NOC

e. Recommendation:

The approval committee may kindly consider the proposal of the Unit for regularization of Cafeteria, in terms of Instruction No. 95 dated 11.06.2019 read with Rule 11(5) of the SEZ Rules, 2006.

**GOVERNMENT OF INDIA,
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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. Crisil Ltd.**, an IT/ITES unit located in Qubix Business Park Pvt. Ltd.-SEZ, Pune for 4th year i.e. FY 2024-25 of 3rd Block period (FY 2021-22 to FY 2025-26).

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

Monitoring of the performance of the unit for 4th year i.e. FY 2024-25 of 3rd Block period (FY 2021-22 to FY 2025-26), in terms of Rule 54 of SEZ Rules, 2006.

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

As per 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: -

Performance as compared to projections for 3rd Block Period (FY 2021-22 to FY 2025-26)

Approved Projections for 3rd Block Period (FY 2021-22 to FY 2025-26)

(Rs. In Crores)

Year	2021-22	2022-23	2023-24	2024-25	2025-26	TOTAL
FOB Value of Exports	109.36	141.89	125.06	131.31	137.88	645.5
FE Outgo	6.96	7.45	28.37	30.36	32.48	105.62
NFE	102.40	134.44	96.69	100.95	105.40	539.88

Performance as compared to projections: FY 2024-25

(Rs. In Crores)

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	
2024-25	131.31	125.10	0.00	0.00	5.23	0.00	0.35
Total	131.31	125.10	0.00	0.00	5.23	0.00	0.35

Cumulative NFE achieved: FY 2024-25

(Rs. in Crores)

Year	Cumulative NFE Achieved	Cumulative % NFE Achieved
2024-25	524.50	98.38%

Employment Achievement : as on 31.03.2025

	Approved	Achieved
Men	500	233
Women	200	161
Total	700	394

Other Information:

LOA No. & Date		LOA No. SEEPZ/FIPL-SEZ/CL/14/2011-12/6158 dated 29.04.2011
Location of Unit		Ground Floor and 1 st Floor, IT-3 Building, Qubix Business Park Pvt. Ltd.-SEZ, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411 057
Validity of LOA		31.05.2031
Item(s) of manufacture/ Services		IT/ITES
Date of commencement of production		01.06.2011
Execution of BLUT		Rs. 14.61 Crores
Outstanding Rent dues		NA
Labour Dues		NA
Validity of Lease Agreement		14.04.2028
Pending CRA Objection, if any		NA
Pending Show Cause Notice/ Eviction Order/Recovery Notice/ Recovery Order issued, if any		NA
a. Projected employment for the block period		700 employees (Men-500, Women-200)
b. No. of employees as on 31.03.2025		394 employees (Men-233, Women-161)
Area allotted (in sq.ft.)		59,985 Sq.ft
Area available for each employee per sq.ft. basis (area / no. of employees)		152.24
Investment till date	Building	0.00
	Plant & Machinery	Rs. 39.89 Crores
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. If no, details of the Year along with no of days delayed to be given.		Yes

The Specified Officer has submitted a report vide letter dated 17.09.2026, in the prescribed format along with point-wise reply to the discrepancies as follows:-

a. Details of year-wise export as per the prescribed format:

From the year 2024-25 (Rs. In Crores)

Year/ Period	Figures reported in APR (FOB Value)	Figures as per Softex / Customs Records	Difference, if any	Reason for Difference / Remarks
2024-25	125.10	125.10	0	No difference.

b. Import

i. (Capital Goods including procurement done on IUT (from SEZ, EOU, STPI, EHTP) basis:

From the year 2024-25 (Rs. In Crores)

Year/ Period	Figures as per APR	Figures as per SEZ Online / Customs Records	Difference, if any	Reason for Difference / Remarks
2024-25	0.00	0.00	NIL	NA

(c) BLUT

1	Value of BLUT Executed (Duty foregone) (including for CG / Raw Material / Services) Value of Additional BLUT executed - Year: Date of acceptance - BLUT amount: TOTAL value of BLUT Executed	Date 01/06/2012 for Rs. 38.09 cr Date : 31.8.26 Rs. 14.81 Total: Rs. 53 Crore						
2	Total Duty Foregone on goods & services procured (Category-wise BLUT value utilized separately for imported and indigenous goods and services) This should be based on BLUT worksheet which provides for estimated value and duty foregone separately for each category of procurement.	Value Rs. In Crore <table><tr><th>FY</th><th>Goods (Imp. & Indi.)</th><th>Services (Imp. & Indi.)</th></tr><tr><td>2024-25</td><td>1.73</td><td>0.42</td></tr></table>	FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)	2024-25	1.73	0.42
FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)						
2024-25	1.73	0.42						

(a)	Employment made as on date (as on end of block period / year up to which monitoring is being done)	As per Projection- Men : 300 Women : 200 Total : 500 As on 31st March 2025: Men : 233 Women : 161 Total : 394
(b)	Details of pending Foreign Remittance beyond Permissible period, if any (as on 31.07.2026) To cross-check the same and verify whether necessary permission from AD Bank / RBI has been obtained.	No Foreign Remittance beyond permissible period is pending for realisation.
(c)	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.	The unit has filed Softex forms for the FY 2024-25 except for Softex ID No. 142600108696 for the month of <u>May</u> , 2024 on 23.04.26 (Invoice No. 24246000032 dt 31.5.24). Hence, this office raised discrepancy on 11.05.26 and directed the unit to file delay condonation for late filing with JDC office.
(d)	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.	Yes, Except Softex for the month of May 24 (request id- 142600108696 filed on 23.4.26). Unit have submitted condonation request with JDC office for approval.
(e)	Whether unit has filed any request for Cancellation of Softex	No
(f)	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
(g)	SO to verify and certify whether the unit has updated the BLUT ledger Module in SEZ Online.	As per office order no. 02/2023 dated 16.03.2023 uploading of BLUT online is kept in abeyance

(h)	Has the unit cleared any Capital Goods procured duty free in DTA against payment of Duty, or otherwise? Full details to be provided along with value of assets and duty discharged.	Details of goods (e-waste) cleared in DTA (in crore) <table border="1" data-bbox="810 215 1201 304"> <tr> <th>FY</th><th>Value</th><th>Duty</th></tr> <tr> <td>2024-25</td><td>0.2009</td><td>0.0710</td></tr> </table>	FY	Value	Duty	2024-25	0.2009	0.0710
FY	Value	Duty						
2024-25	0.2009	0.0710						
(i)	Is the unit sharing any of their infrastructure with other units or are utilizing infrastructure of another unit in the same or other SEZ? If so, details thereof, including the details of the unit with whom the sharing is being made, and the payment terms If approval for sharing of common infrastructure has been obtained from UAC / DC office, the date of UAC / Approval letter to be indicated	No						
(j)	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.	The unit has filed all DSPFs for the year 2024-25.						
(k)	Whether unit has filed all DTA procurement w.r.t. the goods procured by them during the monitoring period for the relevant period. If no, details thereof	Yes.						
(l)	Details of the request IDs pending for OOC in respect of DTA procurement on the date of submission of monitoring report	No DTA request ID is pending for OOC.						

(m)	Has the unit set up any cafeteria / canteen / food court in unit premises? If yes, whether permission from UAC / DC office has been issued, or otherwise office has been issued, or otherwise Whether unit has availed any duty paid goods / services for setting up such facility? 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	Yes, the unit have set up cafeteria and Gymnasium under the Permission File No. SEEPZ/FIPL-SEZ/CL/14/2011-12/VOL-II/ 1258 dated 14/12/2023. Copy of the same attached. No No
(n)	Whether any violation of any of the provisions of law has been noticed / observed by the Specified Officer during the period under monitoring	No

e. **Recommendation:**

- The unit has achieved export revenue of **Rs. 125.10 Crores** as against projected export of **Rs. 131.31 Crores** in the 4th Year i.e. FY 2024-25 of the 3rd Block period (FY 2021-22 to FY 2025-26)
- The unit has also achieved positive NFE of **Rs. 524.50 Crores** as against the projected NFE of **Rs. 434.48 Crores** i.e. **120.72%** in the 4 years i.e. FY 2021-22 to FY 2024-25 of the 3rd Block period (FY 2021-22 to FY 2025-26)
- As per SO report, the unit has achieved Employment of **394 employees (Male: 233, Female: 161)** as on 31.03.2025.
- Approval Committee may like to monitor the performance of the Unit for 4th year i.e. FY 2024-25 of 3rd Block period (FY 2021-22 to FY 2025-26), 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 :

Monitoring of the performance of **M/s. Harbinger Systems Private Limited, Unit 3** an IT/ITES unit located in Qubix Business Park Pvt. Ltd.-SEZ for 5th year i.e. FY 2023-24 of 1st Block Period (FY 2019-20 to FY 2023-24) and 3 years i.e. FY 2024-25 to FY 2026-27 (upto July 2026) of 2nd Block period (FY 2024-25 to FY 2028-29).

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

Monitoring of the performance of the unit for 5th year i.e. FY 2023-24 of 1st Block Period (FY 2019-20 to FY 2023-24) and 3 years i.e. FY 2024-25 to FY 2026-27 (upto July 2026) of 2nd Block period (FY 2024-25 to FY 2028-29), in terms of Rule 54 of SEZ Rules, 2006.

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

As per 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: -

Performance as compared to projections for 1st Block period (FY 2019-20 to FY 2023-24)

Approved Projections for 1st Block period (FY 2019-20 to FY 2023-24) (Rs. In Crores)

	2019-20	2020-21	2021-22	2022-23	2023-24	TOTAL
FOB Value of Exports	0.58	11.11	25.16	30.42	30.42	97.70
FE Outgo	0.29	0.09	0.14	0.05	0.02	0.60
NFE	0.29	11.02	25.01	30.37	30.40	97.09

Performance as compared to projections: FY 2023-24 (Rs. In Crores)

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	
2023-24	30.42	67.80	-	-	60.38	0.00	0.09
Total	30.42	67.80	-	-	60.38	0.00	0.09

Cumulative NFE achieved: FY 2023-24 (Rs. In Crores)

Year	Cumulative NFE Achieved	Cumulative % NFE Achieved
2023-24	175.87	99.77

Performance as compared to projections for 2nd Block period (FY 2024-25 to FY 2028-29)**Approved Projections for 2nd Block period (FY 2024-25 to FY 2028-29)****(Rs. In Crores)**

	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
FOB Value of Exports	71.41	73.90	76.43	79.00	81.61	382.35
FE Outgo	0.71	0.74	0.76	0.79	0.82	3.82
NFE	70.70	73.16	75.67	78.21	80.79	378.53

Performance as compared to projections: FY 2024-25 to FY 2026-27 (Upto July 2026)**(Rs. In Crores)**

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	
2024-25	71.41	52.34	-	-	0.00	0.00	0.04
2025-26	73.90	59.77					4.03
2026-27 (upto July 2026)	76.43	14.94					1.22
Total	221.74	127.05	-	-	0.00	0.00	5.29

Cumulative NFE achieved: FY 2024-25 to FY 2026-27 (Upto July 2026)**(Rs. In Crores)**

Year	Cumulative NFE Achieved	Cumulative % NFE Achieved
2024-25	52.28	99.88%
2025-26	107.99	96.33%
2026-27 (upto July 2026)	121.69	95.78%

Employment Achievement (Direct): As on 31.07.2026

	Approved	Achieved
Men	90	68
Women	64	43
Total	154	111

Other Information:

LOA No. & Date	SEEPZ-SEZ/QBPPL-SEZ/HSPL/74/ 2018-19 dated 11.10.2018
Location of Unit	6 th Floor, Building No. IT-8, VITP Pvt. Ltd. Co-Developer, Qubix Business Park Pvt. Ltd.-SEZ, Plot No. 2, Blue Ridge Township, Rajiv Gandhi Infotech Park, Phase-I, Hinjewadi, Pune 411057
Validity of LOA	15.04.2029
Item(s) of manufacture/ Services	IT/ITES
Date of commencement of production	16.04.2019
Execution of BLUT	Rs. 61.16 Crore
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
a. Projected employment for the block period		154 employees (Men-90, Women-64)
b. No. of employees as on 31.07.2026		111 employees (Men-68, Women-43)
Area allotted (in sq.ft.)		8500 Sq.ft.
Area available for each employee per sq.ft. basis (area / no. of employees)		76.57 Sq.ft.
Investment till date	Building	Rs. 1.05 Crore
	Plant & Machinery	Rs. 1.10 Crore
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. If no, details of the Year along with no of days delayed to be given.		Yes

The Specified Officer vide letter dated 03.09.2026 has submitted his report in the prescribed format for the period FY 2023-24 to FY 2026-27 (upto July-2026), as under: -

a. Details of year-wise export as per the prescribed format:

From the year 2023-24 to 2026-27 (upto July,2026) (Rs. In Crores)

Year/ Period	Figures reported in APR (FOB Value)	Figures as per Softex / Customs Records	Difference, if any	Reason for Difference / Remarks
2023-2024	67.80	67.30	(0.50)	Unit has informed that the difference is due to Exchange rate variation
2024-2025	52.34	51.82	(0.52)	Unit has informed that the difference is due to Exchange rate variation
2025-2026	59.77	58.89	(0.88)	Unit has informed that the difference is due to Exchange rate variation
2026-2027(upto July,2026)	14.94	14.91	(0.03)	Unit has informed that the difference is due to Exchange rate variation

b. Import

i. (Capital Goods including procurement done on IUT (from SEZ, EOU, STPI, EHTP) basis:

From the year 2023-24 to 2026-27(Part) (Rs. In Crores)

Year/ Period	Figures as per APR	Figures as per SEZ Online / Customs Records	Difference, if any	Reason for Difference / Remarks
2023-24 to 2026-27(upto July,26)	0.00	0.00	NIL	NA

(c) BLUT

1	Value of BLUT Executed (Duty foregone) (including for CG / Raw Material / Services) Value of Additional BLUT executed - Year: Date of acceptance - BLUT amount: TOTAL value of BLUT Executed	F. No. Qubix-SEZ/Harbinger-3/BLUT/18-19/637 dated 08.02.2019 Rs. 5.28 Crore F. No. SEEPZ-SEZ/QBPPL-SEZ/HSPL/74/2018-19/403 dated 03.07.2024 Rs. 55.88 Crore Total: Rs. 61.16 Crore																		
2	Total Duty Foregone on goods & services procured (Category-wise BLUT value utilized separately for imported and indigenous goods and services) This should be based on BLUT worksheet which provides for estimated value and duty foregone separately for each category of procurement.	Value Rs. In Crore <table> <tr> <th>FY</th><th>Goods (Imp. & Indi.)</th><th>Services (Imp. & Indi.)</th></tr> <tr> <td>2023-24</td><td>0.00</td><td>0.74</td></tr> <tr> <td>2024-25</td><td>0.00</td><td>0.57</td></tr> <tr> <td>2025-26</td><td>0.01</td><td>0.09</td></tr> <tr> <td>2026-27(upto July)</td><td>0.00</td><td>0.00</td></tr> <tr> <td>Total</td><td>0.01</td><td>1.40</td></tr> </table>	FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)	2023-24	0.00	0.74	2024-25	0.00	0.57	2025-26	0.01	0.09	2026-27(upto July)	0.00	0.00	Total	0.01	1.40
FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)																		
2023-24	0.00	0.74																		
2024-25	0.00	0.57																		
2025-26	0.01	0.09																		
2026-27(upto July)	0.00	0.00																		
Total	0.01	1.40																		
(a)	Employment made as on date (as on end of block period / year up to which monitoring is being done)	As per Projection- Men : 90 Women : 64 Total : 154 As on 31st July 2026: Men : 68 Women : 43 Total : 111																		

(b)	Details of pending Foreign Remittance beyond Permissible period, if any (as on 31.07.2026) To cross-check the same and verify whether necessary permission from AD Bank / RBI has been obtained.	No Foreign Remittance beyond permissible period is pending for realisation.
(c)	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.	The unit has filed Softex forms for all months. However, the unit vide Id No 142600217340 had filed Softex for the month of November,2024 on 24.08.26. The Softex form was filed late, hence this office raised discrepancy on 27.8.26 and directed the unit to file condonation for late filing with JDC office.
(d)	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.	Yes, Except Softex for the month of November-24 (request id- 142600217340 filed on 24.8.26). Unit have submitted condonation request with JDC office for approval.
(e)	Whether unit has filed any request for Cancellation of Softex	No
(f)	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
(g)	SO to verify and certify whether the unit has updated the BLUT ledger Module in SEZ Online.	As per office order no. 02/2023 dated 16.03.2023 uploading of BLUT online is kept in abeyance
(h)	Has the unit cleared any Capital Goods procured duty free in DTA against payment of Duty, or otherwise? Full details to be provided along with value of assets and duty discharged.	No
(i)	Is the unit sharing any of their infrastructure with other units or are utilizing infrastructure of another unit in the same or other SEZ? If so, details thereof, including the details of the unit with whom the sharing is being made, and the payment terms If approval for sharing of common infrastructure has been obtained from UAC / DC office, the date of UAC / Approval letter to be indicated	No
(j)	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.	The unit has informed that certain DSPFs are yet to be filed and are currently under process for filing.
(k)	Whether unit has filed all DTA procurement w.r.t. the goods procured by them during the monitoring period for the relevant period. If no, details thereof	Yes.

(l)	Details of the request IDs pending for OOC in respect of DTA procurement on the date of submission of monitoring report	No DTA request ID is pending for OOC.
(m)	Has the unit set up any cafeteria / canteen / food court in unit premises? If yes, whether permission from UAC / DC office has been issued, or otherwise office has been issued, or otherwise Whether unit has availed any `duty paid goods / services for setting up such facility? 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	No
(n)	Whether any violation of any of the provisions of law has been noticed / observed by the Specified Officer during the period under monitoring	No

e. **Recommendation:**

- The Unit has achieved export revenue of **Rs. 67.80 Crores** as against projected export of **Rs. 30.42 Crores** in the 5th year i.e. FY 2023-24 of the 1st Block Period (FY 2019-20 and FY 2023-24).
- The unit has achieved positive NFE of **Rs. 175.87 Crores** as against projected NFE of **Rs. 97.09 Crores i.e. 181.14%** on Cumulative basis in the 5 years of the 1st Block Period (FY 2019-20 and FY 2023-24).
- The Unit has achieved export revenue of **Rs. 127.05 Crores** as against projected export of **Rs. 221.74 Crores** in the 3 years i.e. FY 2024-25 to FY 2026-27 (upto July 2026) of the 2nd Block Period (FY 2024-25 to FY 2028-29).
- The unit has achieved positive NFE of **Rs. 121.69 Crores** as against projected NFE of **Rs. 219.53 Crores i.e. 55.43%** on Cumulative basis in the 3 years i.e. FY 2024-25 to FY 2026-27 (upto July 2026) of the 2nd Block Period (FY 2024-25 to FY 2028-29).
- As per SO report, the unit has achieved employment of **111 employees (Men-68, Women-43)** as on 31.07.2026.
- As per SO report, certain DSPFs are yet to be filed and are currently under process of filing.
- As per SO report, SOFTEX for the Month of November-2024 has been filed by the unit on 24.08.2026 and is pending for certification for want of delay condonation order.
- Approval Committee may kindly Monitor the performance of the unit for 5th year i.e. FY 2023-24 of 1st Block Period (FY 2019-20 to FY 2023-24) and 3 years i.e. FY 2024-25 to FY 2026-27 (upto July 2026) of 2nd Block period (FY 2024-25 to FY 2028-29), 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 :

Monitoring of the performance of **M/s. Harbinger Systems Pvt. Ltd., Unit 2** an IT/ITES SEZ unit located in Qubix Business Park Pvt. Ltd.-SEZ, Pune for 3rd year i.e. FY 2026-27 (upto July 2026) of 2nd Block Period (FY 2024-25 to FY 2028-29).

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

Monitoring of the performance of the unit for 3rd year i.e. FY 2026-27 (upto July 2026) of 2nd Block Period (FY 2024-25 to FY 2028-29), in terms of Rule 54 of SEZ Rules, 2006.

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

As per 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: -

Performance as compared to projections for 2nd Block period (FY 2024-25 to FY 2028-29)

Approved Projections for 2nd Block Period

(Rs. In Crores)

	2024-25	2025-26	2026-27	2027-28	2028-29	TOTAL
FOB Value of Exports	8.34	10.56	13.40	17.95	19.61	69.86
FE Outgo	0.08	0.10	0.13	0.18	0.20	0.69
NFE	8.26	10.46	13.27	17.77	19.41	69.17

Performance as compared to projections: FY 2026-27 (upto July 2026)

(Rs. In Crores)

Year	Export		F.E. OUTGO				
	Projected	Actual	Raw Material (Goods/Services)		C.G. import		Other outflow
			Projected	Actual	Projected	Actual	Actual
2026-27 (Upto July 2026)	13.40	0.06	0.00	0.00	0.20	0.00	0.00
TOTAL	13.40	0.06	0.00	0.00	0.20	0.00	0.00

Cumulative NFE achieved: 2026-27 (upto July 2026)

(Rs. in Crores)

Year	Cumulative NFE Achieved	Cumulative % NFE Achieved
2026-27 (Upto July 2026)	10.75	99.83%

Employment Achievement (Direct): as on 31.07.2026

	Approved	Achieved
Men	25	4
Women	12	4
Total	37	8

Other Information:

LOA No. & Date		LOA No. SEEPZ-SEZ/QBPPL-SEZ/HSPL/73/2018-19 dtd. 11.10.2018
Location of Unit		6 th Floor, IT-8 Building, VITP Co-Developer, Qubix Business Park Pvt. Ltd. – SEZ, Plot No. 2, Blue Ridge Township, RGIP, Hinjewadi, Pune-411057
Validity of LOA		22.05.2029
Item(s) of manufacture/ Services		IT/ITES
Date of commencement of production		23.05.2019
Execution of BLUT		Rs. 13.10 Crs.
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
a. Projected employment for the block period		37 employees (Men-25, Women-12)
b. No. of employees as on 31.03.2026		8 employees (Men-4, Women-4)
Area allotted (in sq.ft.)		3403 Sq.ft.
Area available for each employee per sq.ft. basis (area / no. of employees)		425.37 Sq.ft.
Investment till date	Building	Rs. 40.30 Crores
	Plant & Machinery	Rs. 47.40 Crores
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. If no, details of the Year along with no of days delayed to be given.		Yes

The Specified Officer vide letter dated 03.09.2026 has submitted his report in the prescribed format for the period FY 2026-27 (upto July 2026), as under:

- a. Details of year-wise export as per the prescribed format:

From the year 2026-27((upto July,2026)

(Rs. In Crores)

Year/ Period	Figures reported in APR (FOB Value)	Figures as per Softex / Customs Records	Difference, if any	Reason for Difference / Remarks
2026-27 (Upto July,2026)	0.06	0.06	0.00	NA

b. Import

i. (Capital Goods including procurement done on IUT (from SEZ, EOU, STPI, EHTP) basis:

From the year 2026-27(Part) (Rs. In Crores)

Year/ Period	Figures as per APR	Figures as per SEZ Online / Customs Records	Difference, if any	Reason for Difference / Remarks
2026-27((upto July,2026)	0.00	0.00	NIL	NA

(c) BLUT

1	Value of BLUT Executed (Duty foregone) (including for CG / Raw Material / Services) Value of Additional BLUT executed - Year: Date of acceptance - BLUT amount: TOTAL value of BLUT Executed	F. No. Qubix-SEZ/Harbinger-2/BLUT/18-19/638 dated 08.02.2019 Rs. 2.77 Crore F. No. SEEPZ-SEZ/QBPPL-SEZ/HSPL/73/2018-19/548 dated 07.08.2024 Rs. 10.33 Crore Total: Rs. 13.10 Crore															
2	Total Duty Foregone on goods & services procured (Category-wise BLUT value utilized separately for imported and indigenous goods and services) This should be based on BLUT worksheet which provides for estimated value and duty foregone separately for each category of procurement.	<table> <tr> <th colspan="3">Value Rs. In Crore</th></tr> <tr> <th>FY</th><th>Goods (Imp. & Indi.)</th><th>Services (Imp. & Indi.)</th></tr> <tr> <td>2026-27(Part)</td><td>0.00</td><td>0.00</td></tr> <tr> <td></td><td></td><td></td></tr> <tr> <td>Total</td><td>0.00</td><td>0.00</td></tr> </table>	Value Rs. In Crore			FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)	2026-27(Part)	0.00	0.00				Total	0.00	0.00
Value Rs. In Crore																	
FY	Goods (Imp. & Indi.)	Services (Imp. & Indi.)															
2026-27(Part)	0.00	0.00															
Total	0.00	0.00															
(a)	Employment made as on date (as on end of block period / year up to which monitoring is being done)	As per Projection- Men : 25 Women : 12 Total : 37 As on 31st July 2026: Men: 4 Women: 4 Total: 08															

(b)	Details of pending Foreign Remittance beyond Permissible period, if any (as on 31.07.2026) To cross-check the same and verify whether necessary permission from AD Bank / RBI has been obtained.	No Foreign Remittance beyond permissible period is pending for realisation.
(c)	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.	No Softex Forms are pending for filing.
(d)	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.	Yes
(e)	Whether unit has filed any request for Cancellation of Softex	No
(f)	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
(g)	SO to verify and certify whether the unit has updated the BLUT ledger Module in SEZ Online.	As per office order no. 02/2023 dated 16.03.2023 uploading of BLUT online is kept in abeyance
(h)	Has the unit cleared any Capital Goods procured duty free in DTA against payment of Duty, or otherwise? Full details to be provided along with value of assets and duty discharged.	No
(i)	Is the unit sharing any of their infrastructure with other units or are utilizing infrastructure of another unit in the same or other SEZ? If so, details thereof, including the details of the unit with whom the sharing is being made, and the payment terms If approval for sharing of common infrastructure has been obtained from UAC / DC office, the date of UAC / Approval letter to be indicated	No
(j)	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.	The unit has informed that certain DSPFs are yet to be filed and are currently under process for filing.
(k)	Whether unit has filed all DTA procurement w.r.t. the goods procured by them during the monitoring period for the relevant period. If no, details thereof	Yes.
(l)	Details of the request IDs pending for OOC in respect of DTA procurement on the date of submission of monitoring report	No DTA request ID pending for OOC.

(m)	Has the unit set up any cafeteria / canteen / food court in unit premises? If yes, whether permission from UAC / DC office has been issued, or otherwise office has been issued, or otherwise Whether unit has availed any `duty paid goods / services for setting up such facility? 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	No
(n)	Whether any violation of any of the provisions of law has been noticed / observed by the Specified Officer during the period under monitoring	No

e. **Recommendation:**

- The unit has achieved export revenue of **Rs. 0.06 Crores** as against projected export of **Rs. 13.40 Crores** in the 3rd year i.e. FY 2026-27 (upto July 2026) of 2nd Block Period (FY 2024-25 to FY 2028-29).
- The unit has achieved Positive NFE of **Rs. 10.75 Crores** as against projected NFE of **Rs. 31.99 Crores i.e. 33.60 %** on Cumulative basis in the 3rd year i.e. FY 2026-27 (upto July 2026) of 2nd Block Period (FY 2024-25 to FY 2028-29).
- As per the SO report, the unit has achieved employment of **8 employees (Male: 4, Female: 4)** as on 31.07.2026.
- As per the SO report, certain DSPFs are yet to be filed and are currently under process of filing.
- Approval Committee may like to monitor the performance of the Unit for 3rd year i.e. FY 2026-27 (upto July 2026) of 2nd Block Period (FY 2024-25 to FY 2028-29), 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 09.10.2026 submitted by M/s. SubEno India Pvt. Ltd., IT/ITES unit located in M/s. Qubix Business Park Private Limited – SEZ for Change in Board of Directors.

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

Approval of the Committee for Change in Board of Directors, in terms of Instruction No. 109 dated 18.10.2021 .

**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: -

Previous List of Board of Directors:

Sr. No.	Name of Director	Designation	Date of Appointment	DIN	Date of Cessation
1.	Mr. Devraj Machhindranath Sonavane	Director	18.05.2023	10169785	
2.	Mr. Veerabathra Kandasamy	Director	25.03.2025	07954211	
3.	Mr. Pallav Chakraborty	Director	25.03.2025	11026349	11.09.2026

Proposed List of Board of Directors:

Sr. No.	Name of Director	Designation	Date of Appointment	DIN
1.	Mr. Devraj Machhindranath Sonavane	Director	18.05.2023	10169785
2.	Mr. Veerabathra Kandasamy	Director	25.03.2025	07954211

Information: -

M/s. SubEno India Pvt. Ltd. having LOA No. SEEPZ/FIPL-SEZ/APSPL/12/2011-12/3244 dated 08.03.2011 is located at 1st, 2nd & 3rd Floor, IT-2 Building, 5th Floor, IT-4 Building, Qubix Business Park Private Limited- SEZ, Phase-I, Hinjewadi, Pune – 411 057.

- DCP: 15.04.2011
- LOA valid till: 14.04.2031

The Unit has submitted following documents:

- Copy of Form No. DIR-12 & Board Resolution for Resignation of Director
- Board Resolution for authorized signatory
- Resignation application of Mr. Pallav Chakraborty, Director
- Copy of Undertaking regarding Personal liability arising, if any, against resigning director
- Copy of undertaking in terms of Instruction No. 109

Reason for change in Board of Directors :

The change in the Directors is due to resignation of Mr. Pallav Chakraborty from the Board of Directors of the company.

e. Recommendation:

Approval Committee may kindly consider the proposal of the unit for Change in Board of Directors, in terms of Instruction no. 109 dated 18.10.2021 issued by MOC&I.
