

**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. SYNTEL INTERNATIONAL
PVT. LTD. SEZ PUNE.**

DATE : 30.06.2025

TIME : 11.30 A.M.

**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 30.06.2025.**

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Agenda Item No. 02: -	Action taken report for the Minutes of the meeting held on 09.05.2025
Agenda Item No. 03: -	Application for approval of change in Board of Director of M/s. Syntel International Pvt Ltd (Developer) and 5 IT/ITES units M/s. Syntel Private Limited.
Agenda Item No. 04: -	Application for approval of change in Designated Partners of M/s. Syntel Software LLP
Agenda Item No. 05: -	Application for approval of change in Board of Director of M/s. Syntel Solutions India Pvt Ltd

मेसर्स सिंटेल् इंटरनेशनल प्रा. लिमिटेड- एसईजेड के आईटी-आईटीईएस सेक्टर के विशिष्ट विशेष आर्थिक क्षेत्र के लिए क्षेत्रीय विकास आयुक्त सीपूज-एसईजेड, मुंबई की अध्यक्षता में 09.05.2025 को आयोजित अनुमोदन समिति की 55 वीं बैठक का विवरण।		
1	सेज का नाम	मेसर्स सिंटेल् इंटरनेशनल प्रा. लिमिटेड- एसईजेड
2	सेक्टर	आईटी/आईटीईएस
3	बैठक क्र	55 वीं
4	तारीख	09.05.2025

उपस्थित सदस्य

क्र.	नाम और पदनाम (एस/श्री.)	विभाग
1	श्रीमती मितल हिरेमठ संयुक्त विकास आयुक्त	पुणे क्लस्टर एसईजेड, पुणे
2	श्री. दिनेश होनमाने 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 धवल एस शिर्के, अधीक्षक	सीमा शुल्क विभाग पुणे नामित

विशेष आमंत्रित

क्रमांक न	नाम और पदनाम (एस/श्री.)	विभाग
1	श्री सतबीर शर्मा, विनिर्दिष्ट अधिकारी	सीपूज-एसईजेड, पुणे क्लस्टर

एजेंडा विषय क्र 01 : दि 21.03.2025 को आयोजित 54 वीं बैठक के कार्यवृत्त की पुष्टि ।

विचार-विमर्श के बाद, समिति ने 21.03.2025 को आयोजित 54 वीं अनुमोदन समिति की बैठक के कार्यवृत्त की पुष्टि की।

एजेंडा विषय क्र 02: 21.03.2025 को आयोजित 54 वीं बैठक के कार्यवृत्त के लिए की गई कार्रवाई रिपोर्ट ।

विचार-विमर्श के बाद, समिति ने 21.03.2025 को आयोजित बैठक के लिए की गई कार्रवाई रिपोर्ट नोट की है। एडीसी ने सूचित किया है कि सिंटेल् इंटरनेशनल प्रा. लिमिटेड- एसईजेड में कोई भी एजेंडा लंबित नहीं है।

एजेंडा विषय क्र 03: मेसर्स सिंटेल् प्राइवेट लिमिटेड का मॉनिटरिंग ऑफ परफॉर्मन्स

विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, पहले ब्लॉक अवधि के पांचवें वर्ष अर्थात वित्त वर्ष 2017-18 , दूसरे ब्लॉक अवधि के पांच वित्त वर्ष 2018-19 से 2022-23 और तीसरे ब्लॉक अवधि के पहले वर्ष अर्थात वित्तीय वर्ष 2023-24 तक के लिए यूनिट के परफॉर्मन्स को नोट किया।

- यूनिट ने पहले ब्लॉक अवधि के पांचवें वित्त वर्ष FY 2017-18 में संचयी आधार पर 507.96 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 236.71 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने वित्त वर्ष 2017-18 में संचयी आधार सकारात्मक एन.एफ.ई 1204.22 करोड़ रुपये (नेट विदेशी मूल्य) यानी 67.56% हासिल किया है।
- यूनिट ने दूसरे ब्लॉक अवधि के पांचवें वित्त वर्ष FY 2022-23 में संचयी आधार पर 549.95 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 2044.76 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने वित्त वर्ष 2022-23 में संचयी आधार सकारात्मक एन.एफ.ई 2005.81 करोड़ रुपये (नेट विदेशी मूल्य) यानी 98.09% हासिल किया है।
- यूनिट ने वित्त वर्ष 2022-23 में संचयी आधार सकारात्मक एन.एफ.ई 2005.81 करोड़ रुपये (नेट विदेशी मूल्य य) हासिल किया है।
- यूनिट ने तीसरे ब्लॉक अवधि के पहले वित्तीय वर्ष FY 2023-24 में संचयी आधार पर 234.02 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 425.83 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने वित्त वर्ष 2023-24 में संचयी आधार सकारात्मक एन.एफ.ई 412.83 करोड़ रुपये (नेट विदेशी मूल्य) यानी 96.95% हासिल किया है।
- यूनिट ने 864 कर्मचारियों (पुरुष- 556 महिला- 308) को रोजगार दिया है।
- समिति ने यह भी पाया कि यूनिट ने भारतीय रुपये में प्राप्त भुगतान के बदले डीटीए में सेवाएं प्रदान की हैं , जैसा कि नीचे बताया गया है:

F.Y.	DTA Sale in INR (in Lakhs)
2018-19	6.24
2019-20	14.53
2020-21	51.42
2023-24	27.75
कुल	99.94

समिति ने यह भी पाया कि इकाई ने निर्धारित समय के भीतर एपीआर नहीं भरा है।

वर्ष	दाखिल करने की तारीख	एसईजेड ऑनलाइन में दाखिल करने की वास्तविक तिथि	दाखिल करने में देरी (दिनों की संख्या)
2021-22	30.09.2022	30.11.2022	2 महीने
2022-23	30.09.2023	26.02.2024	5 महीने

अनुमोदन समिति ने एसईजेड अधिनियम, 2005 की धारा 2(जेड)(iii) के प्रावधान का उल्लंघन करने और एपीआर दाखिल करने में देरी के लिए एससीएन जारी करने का निर्देश दिया।

एजेंडा विषय क्र 04: मेसर्स सिंटेल् सॉफ्टवेयर लिमिटेड लायबिलिटी पार्टनरशिप (एलओए 08) का मॉनिटरिंग ऑफ़ परफॉर्मन्स
विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, पहले ब्लॉक अवधि के 4 वित्त वर्ष अर्थात 2020-21 से 2023-24 तक के लिए यूनिट के परफॉर्मन्स को नोट किया।

- यूनिट ने पहले ब्लॉक अवधि के चौथे वर्ष अर्थात वित्त वर्ष में 16.72 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 3.68 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने संचयी आधार पर पहले ब्लॉक अवधि के चौथे वर्ष में 3.56 करोड़ रुपए यानि 96.39% का सकारात्मक एनएफई हासिल किया है।
- यूनिट ने 3 कर्मचारियों (पुरुष-1, महिला - 2) को रोजगार दिया है।
- समिति ने यूनिट को लंबित सॉफ्टवेक्स को शीघ्र दाखिल करने का निर्देश दिया।

एजेंडा विषय क्र 05: मेसर्स सिंटेल् सॉफ्टवेयर लिमिटेड लायबिलिटी पार्टनरशिप (एलओए 07) का मॉनिटरिंग ऑफ़ परफॉर्मन्स
विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, पहले ब्लॉक अवधि के 4 वित्त वर्ष अर्थात 2020-21 से 2023-24 तक के लिए यूनिट के परफॉर्मन्स को नोट किया।

- यूनिट ने पहले ब्लॉक अवधि के चौथे वर्ष अर्थात वित्त वर्ष में 58.82 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 9.59 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने संचयी आधार पर पहले ब्लॉक अवधि के चौथे वर्ष में 9.49 करोड़ रुपए यानि 98.98% का सकारात्मक एनएफई हासिल किया है।
- यूनिट ने 01 कर्मचारियों (पुरुष-01, महिला - 00) को रोजगार दिया है।
- समिति ने यूनिट को लंबित सॉफ्टवेक्स को शीघ्र दाखिल करने का निर्देश दिया।

एजेंडा विषय क्र 06: मेसर्स सिंटेल् प्राइवेट लिमिटेड का मॉनिटरिंग ऑफ़ परफॉर्मन्स
विचार-विमर्श के बाद, समिति ने एसईजेड नियम, 2006 के नियम 54 के अनुसार, पहले ब्लॉक अवधि के पांच वित्त वर्ष अर्थात 2017-18 से 2021-22 और दूसरे ब्लॉक अवधि के दो वित्त वर्ष 2022-23 और वित्तीय वर्ष 2023-24 तक के लिए यूनिट के परफॉर्मन्स को नोट किया।

- यूनिट ने पहले ब्लॉक अवधि के पांचवें वित्त वर्ष 2021-22 में संचयी आधार पर 534.03 करोड़ रुपये के अनुमानित निर्यात के मुकाबले 1019.36 करोड़ रुपये का निर्यात हासिल किया है।
- यूनिट ने वित्त वर्ष 2021-22 में संचयी आधार सकारात्मक एन.एफ.ई 933.91 करोड़ रुपये यानि 91.62% (नेट विदेशी मूल्य) हासिल किया है।
- यूनिट ने दूसरे ब्लॉक अवधि के दूसरे वित्त वर्ष FY 2023-24 में संचयी आधार पर 406.78 करोड़ रुपये के अनुमानित निर्यात के

मुकाबले 300.96 करोड़ रुपये का निर्यात हासिल किया है।

- यूनिट ने वित्त वर्ष 2023-24 में संचयी आधार सकारात्मक एन.एफ.ई 294.23 करोड़ रुपये यानि 97.76% (नेट विदेशी मूल्य) हासिल किया है।
- यूनिट ने 431 कर्मचारियों (पुरुष- 299 महिला- 132) को रोजगार दिया है।
- समिति ने यह भी पाया कि यूनिट ने भारतीय रुपये में प्राप्त भुगतान के बदले डीटीए में सेवाएं प्रदान की हैं , जैसा कि नीचे बताया गया है:

FY	Amount in INR in Crore
2019-20	56.91
2021-22	8.46
2023-24	1.31
Total	66.68

चूंकि यूनिट को विदेशी मुद्रा के बजाय भारतीय रुपये में भुगतान प्राप्त हुआ है , इसलिए अनुमोदन समिति ने एसईजेड अधिनियम , 2005 की धारा 2 (जेड) (iii) के प्रावधान का उल्लंघन करने के लिए कारण बताओ नोटिस जारी करने का निर्देश दिया।

- समिति ने यह भी पाया कि इकाई ने निर्धारित समय के भीतर एपीआर नहीं भरा है। एपीआर दाखिल करने में विलंब निम्नानुसार है |

वर्ष	दाखिल करने की तारीख	एसईजेड ऑनलाइन में दाखिल करने की वास्तविक तिथि	दाखिल करने में देरी (दिनों की संख्या)
2019-20	31.12.2021 (विस्तारित)	02.01.2021	02 दिन
2021-22	30.09.2022	30.11.2022	2 महीने
2022-23	30.09.2023	20.02.2024	5 महीने

इसलिए अनुमोदन समिति ने एसईजेड अधिनियम , 2005 के प्रावधान का उल्लंघन करने के लिए कारण बताओ नोटिस जारी करने का निर्देश दिया है।

अध्यक्ष को धन्यवाद ज्ञापन के साथ बैठक समाप्त हुई।

Minutes of the 55 th Meeting of the Approval Committee held under the Chairmanship of Zonal Development Commissioner SEEPZ-SEZ for Sector Specific Special Economic Zone for IT-ITES of M/s. Syntel International Pvt. Ltd.; Pune held on 09.05.2025.		
1	Name of the SEZ	M/s. Syntel International Pvt. Ltd., Pune.
2	Sector	IT-ITES
3	Meeting No.	55 th
4	Date	09.05.2025

Members present

Sr No.	Name and Designation(S/Shri.)	Department
1	Smt. Mital Hiremath Joint Development Commissioner	Pune Cluster SEZ, Pune
2	Shri. Dinesh Honmane Dy. Commissioner, IT	Nominee of Income Tax, Pune
3	Shri. Sanjeev 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. Dhaval Shirke, Superintendent	Nominee of Customs, Pune

Special Invitee

Sr	Name and Designation	Department
1	Shri. Satbir Sharma, Specified Officer	SEEPZ-SEZ, Pune Cluster

Agenda Item No.01: Confirmation of Minutes of the 54th meeting held on 21.03.2025.

The Committee, after deliberation confirmed the minutes of the 54th meeting of the Approval Committee held on 21.03.2025.

Agenda Item No. 02: Action taken report for the Minutes of the 54th meeting held on 21.03.2025.

After deliberation, the Committee has noted the Action taken report for the meeting held on 21.03.2025. ADC has informed that there are no pending agendas in r/o M/s Syntel International Pvt Ltd.

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

After deliberation, the committee noted the performance of the unit for 5th year of 1st Block period i.e. FY 2017-18, 5 years of 2nd Block period i.e. FY 2018-19 to 2022-23 and 1st year i.e. FY 2023-24 of the 3rd Block period in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of Rs. 236.71 Crores as against projected export of Rs. 507.96 Crores in the 5th year (FY 2017-18) of 1st Block period.
- The unit has achieved positive NFE of Rs. 1204.22 Crores on cumulative basis. i.e 67.56% at the end of 5th year (FY 2017-18) of 1st block period
- The Unit has achieved export revenue of Rs. 2044.76 Crores as against projected export of Rs. 549.95 Crores in the 5th year (FY 2022-23) of 2nd Block period.
- The unit has achieved positive NFE of Rs. 2005.81 Crores on cumulative basis i.e 98.09% at the end of 5th year (2022-23) of 2nd block period.
- The Unit has achieved export revenue of Rs. 425.83 Crores as against projected export of Rs. 234.02 Crores in the 1st year (FY 2023-24) of 3rd Block period.
- The unit has achieved positive NFE of Rs. 412.83 Crores on cumulative basis i.e 96.95% at the end of 1st year (FY 2023-24) of 3rd Block period.
- The unit has achieved employment of 864 employees (Men-556, women-308).
- The committee also observed that the unit has made services in DTA against the payments received in INR as detailed below:

FY	Amount in INR (in Cr)
2018-19:	6.24
2019-20	14.53
2020-21	51.42
2023-24	27.75
Total	99.94

Since providing of "Services" in DTA against payment received in INR does not qualify as 'Services' as per definition given in Section 2(z) of the SEZ Act, 2005, The unit has made violation of various provision of SEZ Act / Rules and under Foreign Trade (Development and Regulation) Act, 1992.

The committee also observed that the unit has not filled APR within the stipulated time. The delay in filing of APRs is as under:

Year	Due Date of Filing	Actual Date of Filing in SEZ Online	Delay in Filing (No Of Days)
2021-22	30.09.2022	30.11.2022	2 months

2022-23	30.09.2023	26.02.2024	5 months
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The Approval Committee directed to issue a SCN for contravening the provision of Section 2(z)(iii) of SEZ Act, 2005 and delay in filing of APR.

Agenda Item No. 04: Monitoring of Performance for M/s. Syntel Software Limited Liability Partnership (LOA 08)

After deliberation, the committee noted the performance of the unit for 4 years i.e. FY 2020-21 to FY 2023-24 of 1st Block period in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of Rs. 3.68 Crores as against projected export of Rs. 16.72 Crores in 4th year of 1st Block period i.e. FY 2023-24.
- The unit has achieved positive NFE of Rs. 3.56 Crores in 4th year of 1st block period on cumulative basis.
- The unit has achieved employment of 03 employees (Men-01, women-02).
- The Committee directed the Unit to file the pending SOFTEX at the earliest.

Agenda Item No. 05: Monitoring of Performance for M/s. Syntel Software Limited Liability Partnership (LOA 07)

After deliberation, the committee noted the performance of the unit 4 years i.e. FY 2020-21 to FY 2023-24 OF 1st Block period in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of Rs. 9.59 Crores as against projected export of Rs. 58.82 Crores in 4th year of 1st Block period i.e. FY 2023-24.
- The unit has achieved positive NFE of Rs. 9.49 Crores in 4th year of 1st block period on cumulative basis.
- The unit has achieved employment of 01 employees (Men-01, women-00).
- The Committee directed the Unit to file the pending SOFTEX at the earliest.

Agenda Item No. 06: Monitoring of Performance for M/s. Syntel Pvt Ltd.

After deliberation, the committee noted the performance of the unit for 5 years of 1st Block period i.e. FY 2017-18 to 2021-22 and 2 years of 2nd Block period i.e. FY 2022-23 and 2023-24 in terms of Rule 54 of SEZ Rules, 2006.

- The Unit has achieved export revenue of Rs. 1019.36 Crores as against projected export of Rs. 534.03 Crores in 1st Block period i.e. FY 2017-18 to FY 2021-22.
- The unit has achieved positive NFE of Rs. 933.91 Crores in 5th year of 1st block period on cumulative basis.
- The Unit has achieved export revenue of Rs. 300.96 Crores as against projected export of Rs. 406.78 Crores in the 2nd year of 2nd Block period i.e. FY 2023-24
- The unit has achieved positive NFE of Rs. 294.23 Crores in 2nd year of 2nd block period on cumulative basis.
- The unit has achieved employment of 431 employees (Men-299, women-132).
- The committee also observed that the unit has made services in DTA against the payments received in INR as detailed below:

FY	Amount in INR (in Cr.)
2019-20	56.91

2021-22	8.46
2022-23	1.31
Total	66.68

Since providing of “Services” in DTA against payment received in INR does not qualify as ‘Services’ as per definition given in Section 2(z) of the SEZ Act, 2005, The unit has made violation of various provision of SEZ Act / Rules and under Foreign Trade (Development and Regulation) Act, 1992.

As the Unit has received payment in INR instead of Foreign Currency the Approval Committee directed to issue a SCN for contravening the provision of Section 2(z)(iii) of SEZ Act, 2005.

The committee also observed that the unit has not filled APR within the stipulated time. The delay in filing of APRs is as under:

Year	Due Date of Filing	Actual Date of Filing in SEZ Online	Delay in Filing (No Of Days)
2019-20	31.12.2021 (extended)	02.01.2021	02 Days
2021-22	30.09.2022	30.11.2022	2 months
2022-23	30.09.2023	20.02.2024	5 months

As the unit has contravened the provision of SEZ Act and Rules, the committee has directed to issue a SCN to the Unit.

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

Action Taken for Approval Committee held on 09-05-2025

Agenda Item No.	Subject	Remarks
Agenda Item No. 01	Confirmation of the Minutes of the 3rd Meeting held on 21-03-2025	
Agenda Item No. 02	Application for Monitoring of Performace(M/s Syntel Software LLP - 07)	Approval letter is issued to the Unit on 27.05.2025.
Agenda Item No. 03	Application for Monitoring of Performace(M/s Syntel Software LLP - 08)	Approval letter is issued to the Unit on 27.05.2025.
Agenda Item No. 04	Application for Monitoring of Performace(Syntel Private Limited-LOA 03)	Approval letter is issued to the Unit on 27.05.2025. SCN is issued to the Unit on 04.06.2025
Agenda Item No. 05	Application for Monitoring of Performace(M/s Syntel Private Limited)	Approval letter is issued to the Unit on 27.05.2025. SCN is issued to the Unit on 04.06.2025

**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 :

Proposal dated 14.05.2025 submitted by M/s. Syntel International Pvt Ltd (Developer) and M/s Syntel Pvt. Ltd. (5 IT/ITES units) located in M/s. Syntel International Pvt Ltd.- SEZ for Change in Board of Directors.

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

Approval of the Approval 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: -

Change in Directors of Company:

Existing List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Mr. Sreeram Radhakrishnan	Director

Proposed List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Ms. Mini Sony Kochupurakal	Director

- M/s. Syntel International Pvt Ltd (Developer) (F2/101/2005-EPZ Dated 09.06.2006) and M/s Syntel Pvt. Ltd. (their 5 IT/ITES Units) have submitted application for Change in Board of Director for their following LOA Nos.
- Unit-1-LOA.No. SEZ/PUNE/26/2007-08/54 Dated 28.03.2008
- Unit-2-LOA.No. SEEPZ-SEZ/SIPL-SEZ/SL/03/2012-13/906 Dated 22.01.2013
- Unit-3-LOA.No. SEEPZ/SIPL-SEZ/SL/06/2012-13/1452 Dated 03.02.2014
- Unit-4-LOA.No. SEEPZ-SEZ/SIPL-SEZ/SL/05/2012-13/3776 Dated 20.03.2013
- Unit-5-LOA.No. SEEPZ/NEWSEZ/DDPL-PUNE/03/LOA-03/2007-08/2127 Dated 13.03.2008
- The Developer/Units has submitted following documents:
- Updated List of directors as on 20.01.2025.
- DIR 12 Mr. Sreeram Radhakrishnan (Cessation) and appointment of Ms. Mini Sony Kochupurakal.

- Undertaking in r/o resigning director & in terms of Instruction no. 109
- Board Resolution for Appointment of Ms. Mini Sony Kochupurakal as an additional director.
- Board Resolution for Resignation of Mr. Sreeram Radhakrishnan as Director of the Company.
- The Unit / Developer have submitted that due to resignation of Mr. Sreeram Radhakrishnan and appointment of Ms. Mini Sony Kochupurakal, there is no change in share holding pattern of the company.

e. **Recommendation:**

- The Developer/Units has submitted an Unidertaking for outgoing Director and also confirms that there are no liability/cases pending against him.
- Approval Committee may kindly consider the proposal of Developer and their 5 Units for change in Board of Directors in terms of Instruction no. 109 issued by MOC&I.

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AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 22.05.2025 submitted by M/s. Syntel Software LLP (2 unit) IT/ITES units located in M/s. Syntel International Pvt Ltd.- SEZ for Change in Board of Directors.

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

Approval of the Approval 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: -

Change in Directors of Company:

Existing List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Mr. Sreeram Radhakrishnan	Director

Proposed List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Ms. Mini Sony Kochupurakal	Director

- M/s. Syntel Software LLP (2 units) has submitted application for their following LOA Nos.
 1. SEEPZ/SIPL-SEZ/SSLLP/07/2019-20/3041 Dated 09.03.202
 2. SEEPZ/SIPL-SEZ/SSLLP/08/2019-20/3080 Dated 13.03.2020
- The units have submitted following documents:
 - Updated List of directors as on 15.11.2024.
 - Form No 3
 - Copy of Payment Challan to Ministry of Corporate Affairs for LLP Form No. 3

- Undertaking in r/o resigning director & in terms of Instruction no. 109
- The Units have submitted that due to resignation of Mr. Sreeram Radhakrishnan and appointment of Ms. Mini Sony Kochupurakal, there is no change in share holding pattern of the company.

e. **Recommendation:**

- The Units has submitted the Unidertaking for outgoing Director and confirms that there are no liability/cases pending against him.
- Approval Committee may kindly consider the proposal of Units for change in Board of Directors in terms of Instruction no. 109 issued by MOC&I.

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AGENDA NOTE FOR CONSIDERATION OF APPROVAL COMMITTEE

a. Proposal :

Proposal dated 19.05.2025 submitted by M/s. Syntel Solutions India Pvt Ltd for Change in Board of Directors.

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

Approval of the Approval 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: -

Change in Directors of Company:

Existing List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Mr. Sreeram Radhakrishnan	Director

Proposed List of Directors

Sr. No	Name of Directors	Designation
1	Mr. Rakesh Khanna	Director
2	Ms. Mini Sony Kochupurakal	Director

- LOA Nos: - SEEPZ-SEZ/TSSPL/02/2011-12/434 Dated 10.01.2011.
- The Unit has submitted following documents:
 - Updated List of directors as on 20.01.2025.
 - DIR 12 Mr. Sreeram Radhakrishnan (Cessation) and appointment of Ms. Mini Sony Kochupurakal.
 - Undertaking in r/o resigning director & in terms of Instruction no. 109
 - The Unit have submitted that due to resignation of Mr. Sreeram Radhakrishnan and appointment of Ms. Mini Sony Kochupurakal, there is no change in share holding pattern of the company.

e. Recommendation:

- The unit has submitted that Mr. Sreeram Radhakrishnan was Director, and confirms that there are no

liability/cases pending against him.

- Approval Committee may kindly consider the proposal of the unit for change in Board of Directors in terms of Instruction no. 109 issued by MOC&I.
