



May 29, 2025

To  
Manager (CRD)  
**National Stock Exchange of India Ltd. (NSE)**  
Exchange Plaza, Bandra Kurla Complex  
Bandra (E), Mumbai - 400051

**Script Code- ARROWGREEN**

**Ref. No.: NSE/INVG/2025/142861**  
**Sub: Reply Letter**

Dear Sir,

This is with reference to your letter dated March 7, 2025, seeking various information/documents and as well as the subsequent email correspondence in this regard. Please find below the Company's response:

1. a. Complete details of Management Information System (MIS) like types of information, officials / person with whom MIS are being shared, frequency of MIS etc. for the period 15th June 2024 to 31st August 2024.

**Reply:** Various MIS reports are shared with the management which include board pack (business and financial updates) on quarterly basis, dashboard (monthly business performance update) on monthly basis, sales tracker, receivable tracker, production tracker, tracker for utilisation of banking limits, HR reports etc.

S.No.	Particulars	Frequency	To
1	Sales Tracker	Monthly or as per requirement	Neil Patel (JMD), Hitesh Punglia (CFO), Leena Kapoor (Vice President - Operation), Prasanna Bhatkar (Finance Controller), Arun Rath (Business Head), Priyanka Mundakel (Sr Manager Operation)
2	Production Reports	Daily, Weekly, Monthly or as per requirement	Leena Kapoor (Vice President-Operation)
3	Receivable Reports	Fortnightly or as per requirement	Arun Rath (Business Head), Hitesh Punglia (CFO), Leena Kapoor (Vice President - Operation) Swastik Karekar (Operation)
4	Banking Limit Utilisation report	Monthly or as per requirement	Hitesh Punglia (CFO), Gulab Chand Yadav (Business Head-Trading & Sourcing), Prasanna Bhatkar (Finance Controller)

**ARROW GREENTECH LTD**

CIN No.: L21010MH1992PLC069281

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Phone: +91 22-4974 3758 , Email : [contact@arrowgreentech.com](mailto:contact@arrowgreentech.com) Website: [www.arrowgreentech.com](http://www.arrowgreentech.com)

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5	HR MIS Reports	Monthly or as per requirement	Seema Oberoi (VP-Human Resources)
6	Dashboard (Business & Financial Performance Update)	Monthly	Shilpan Patel (MD), Mr. Neil Patel, Mr. Hitesh Punglia (CFO), Mr. Rahul Sakpal (Manager Finance)
7	Board Pack (Business & Financial Update)	Quarterly	Shilpan Patel (MD), Neil Patel (JMD), Hitesh Punglia (CFO), Poonam Bansal (Company Secretary)

**1.b.** Copies of MIS Reports or any other reports in relation to the said **announcement** of the company which were generated / prepared during the said period. Also provide the details of - Directors / Key Management Persons ("KMPs") / other persons to whom such reports were shared and Dates when such reports were shared (complete details like date of email / letter, date of receipt etc.)

**Reply:** During the period 15<sup>th</sup> June 2024 to 31<sup>st</sup> August 2024, Dash Boards were shared with Mr. Shilpan Patel (CMD), Mr. Neil Patel (JMD) and Mr. Hitesh Punglia (CFO) and Mr. Rahul Sakpal (Manager - Finance) on 26<sup>th</sup> June 2024 and 20<sup>th</sup> August 2024 and Board Pack was shared to Mr. Shilpan Patel, Mr. Neil Patel, Mr. Hitesh Punglia, and Mrs. Poonam Bansal on 2<sup>nd</sup> August 2024. Also accounts team actively work on updation of books of account and closure of quarterly audit with our statutory auditors team (**Refer Annexure 1b- MIS**) (**Refer Annexure 1d- Detail of Directors/KMPs**).

**1.c. Sequence of events from the date of commencement of discussion to execution of these events in a chronological order in the following format along with proof:**

**Reply:** Quarterly audit work begins after end of each quarter. To start with, accounts team review and update the books of accounts, post required accounting entries and update the financial statements. Draft financials are shared with auditors along with all the supporting documents and accounting software. Auditors team review and do the audit of books of accounts before schedule date of board meeting. Then financials along with board pack shared with executive directors for review. Finally, financials are reviewed in audit committee and approval in board meeting.

During this period, after end of 1<sup>st</sup> quarter accounts team have worked on updation of books of accounts and prepared first draft financials on 16<sup>th</sup> July 2024 and shared the same with auditors on 17<sup>th</sup> July 2024. On 23<sup>rd</sup> July 2024 second version shared with the auditors. On 1<sup>st</sup> August 2024 and 2<sup>nd</sup> August 2024, final review and formatting of report is done and shared with auditors. Board Pack was shared to Mr. Shilpan Patel (MD), Mr. Neil Patel (JMD), Mr. Hitesh Punglia (CFO), and Mrs. Poonam Bansal (Company Secretary) on 2<sup>nd</sup> August 2024.

**1.d. Information about the entities who were aware of the aforesaid announcements:**

**Reply:** Detail attached in excel sheet. **Annexure 1d**

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1.e. Certified copy of extract of Structured Digital Database (SDD) w.r.t. Unpublished Price Sensitive Information (“UPSI”) relating to the aforesaid **announcement**, containing –

The names of such persons who have shared the information and  
The names of such persons with whom information is shared under this regulation

**Reply:** *Structured Digital Database (SDD) is only accessible to Mrs. Poonam Bansal, Company Secretary of the Company and she did not share any Unpublished Price Sensitive Information (UPSI) or any confidential information relating to Financial Statement to any person.*

1.f. Additional details such as:

- (A) Details of person(s) who had access to SDD during the period 15th June 2024 to 31st August 2024.
- (B) Details of logs (including date and time) of access made to SDD during the period 15th June 2024 to 31st August 2024.
- (C) Details of modifications, if any, to SDD post the UPSI / information was made public.

**Reply (A):** *Structured Digital Database (SDD) is only accessible to Mrs. Poonam Bansal, Company Secretary of the Company.*

**Reply (B):** *Attached Excel Sheet. Annexure 1 f (B)*

**Reply (C):** *No modification in SDD software.*

2. Also provide the information with regards to the entities connected to the company in the format given below:

**Reply:** *Attached Excel Sheet. Annexure 2*

3. Kindly provide details of all on market and off market trades undertaken by the Directors, Promoters, KMPs, Compliance officer of the Company and their family members during the time period 15th June 2024 to 31st August 2024. If they have not made any transactions, then confirmation thereof.

**Reply:** *There was no off market trades undertaken by the Directors, Promoters, KMPs, Compliance officer of the Company and their family members during the time period 15th June 2024 to 31st August 2024. However few on market trades was undertaken by Directors and Promoters on 6<sup>th</sup> August 2024, which was already informed to Stock Exchanges on 9<sup>th</sup> August 2024. Annexure 3*

4. Kindly provide a Trading plan, if any, approved by the Compliance Officer during the period from 15th June 2024 to 31st August 2024.

**Reply:** *Please note during the period from 15<sup>th</sup> June 2024 to 31<sup>st</sup> August 2024, no Trading Plan was approved by the Compliance Officer.*

5. Does your company or any designated employee of your company or entities connected to the company mentioned at Point 2 above has any connection with the following entities:

**Reply:** *The Company had already informed by email dated March 17, 2025 that the list of persons along with PAN mentioned under point no. 5 in the attached letter are not connected with the Company nor its designated employee of the Company or entities connected to the company. Thereafter, the Company by its email dated May 26, 2025, shared the list of entities referred to in Query 5 with designated employee or entities connected to the company, requesting confirmation as to whether any of them were connected. However, no responses were received indicating any such connection.*

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6. Details of report on leak of information, if any, pertaining to the aforesaid UPSI and inquiry held thereof.

**Reply:** *No report on leak of information, pertaining to the aforesaid UPSI and no inquiry was held.*

7. In case of Board Meetings held, provide the minutes of the same.

**Reply:** *Copy of the Minutes of the Meeting is enclosed as **Annexure 7***

Yours sincerely,

For **Arrow Greentech Limited**



Poonam Bansal  
**Company Secretary**

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