सत्यमेव जयते

GOVERNMENT OF INDIA
MINISTRY OF CORPORATE AFFAIRS

ROC Delhi II

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Order ID: PO/ADJ/04-2026/DC/01931 **Dated: 07/04/2026**

ORDER FOR ADJUDICATION OF PENALTY UNDER SECTION 454 OF THE COMPANIES ACT, 2013 ('THE ACT') FOR VIOLATION OF SECTION 172 OF THE COMPANIES ACT, 2013.

A. Appointment of Adjudicating Officer:

Ministry of Corporate Affairs vide its Gazette notification number S.O. 831(E) dated 24/03/2015 appointed undersigned as Adjudicating Officer in exercise of the powers conferred by section 454 of the Companies Act, 2013 [herein after known as Act] read with Companies (Adjudication of Penalties) Rules, 2014 for adjudging penalties under the provisions of this Act.

B. Company details:

In the matter relating to BHARAT PET LIMITED [herein after known as Company] bearing CIN U25209DL1998PLC091888, is a company registered with this office under the Provisions of the Companies Act, 2013/1956 having its registered office situated at PLOT. I -12, DSIDC INDUSTRIEAL COMPLEX ROHTAK ROAD, NANGLOI NA NEW DELHI WEST DELHI DELHI INDIA 110041

Individual details:

In the matter relating to SUBHASH CHANDER [herein after known as individual] having DIN 00802157 and having its address at B-10, BHAGWAN DASS NAGAR EAST PUNJABI BAGH NEW DELHI DELHI INDIA 110026

In the matter relating to MEENA GUPTA [herein after known as individual] having DIN 00704207 and having its address at B-10 BHAGWAN DASS NAGAR EAST PUNJABI BAGH NEW DELH DELHI INDIA 110026

In the matter relating to DEEPAK GUPTA [herein after known as individual] having DIN 00703704 and having its address at 10/61, WEST PUNJABI BAGH NEW DELHI DELHI INDIA 110026

In the matter relating to VINOD KUMAR [herein after known as individual] having DIN 06521597 and having its address at 1210, SHTIYA PANA VILL POOTH KHURD DELHI DELHI INDIA 110039

In the matter relating to SATYA NARAIN GUPTA [herein after known as individual] having DIN 00802433 and having its address at 10/61, WEST PUNJABI BAGH NEW DELHI DELHI INDIA 110026

C. Provisions of the Act:

If a company is in default in complying with any of the provisions of this Chapter and for which no specific penalty or punishment is provided therein, the company and every officer of the company who is in default shall be liable to a penalty of fifty thousand rupees, and in case of continuing failure, with a further penalty of five hundred rupees for each day during which such failure continues, subject to a maximum of three lakh rupees in case of a company and one lakh rupees in case of an officer who is in default.

D. Facts about the case:

1. Default committed by the officers in default/noticee - I.This office is in receipt of application through e-form GNL-1 vide SRN AC2171855 dated 05.02.2026 from the company for adjudication of penalties for default u/s 170(2) of the Companies Act, 2013 and Rule 18 of the Companies (Appointment and Qualification of Directors) Rules, 2014. As per the application, following has been submitted:
i.That, in the financial year 2013-2014, board resolved to appoint Mr. Satya Narain Gupta as an Additional Director and term of appointment was up to the ensuing Annual General Meeting (AGM) of the Company.
ii.That pursuant to the above, the Company was required to file e-form DIR-12 for appointment of the said director as an Additional Director as per the provision of Section 161(1) & 170(2) of the Companies Act, 2013 r/w Rule 18 of the Companies (Appointment and Qualification of Directors) Rules 2014.
iii.That the Board Resolution recorded the appointment of Mr. Satya Narain Gupta as ?Director? instead of ?Additional Director? and consequently e-form DIR-12 vide SRN C07036262 dated 24.03.2014 was also filed with the designation selected as ?Director? instead of ?Additional Director?, of the Company from 24.03.2014 onwards.
iv.That after regularisation of the said director in the Annual General Meeting (AGM) of the Company the management encountered a technical limitation as Mr. Satya Narain Gupta was already reflected and designated as a ?Director? on account of the previously filed DIR-12 vide SRN C07036262 and consequently, the system did not permit selection of the same designation again for the purpose of regularisation as it would have resulted in duplication of the name of the same Director in the master data maintained on the MCA portal.
v.That the said non-compliance continued till the demise of Mr. Satya Narain Gupta, who consequently ceased to be Director of the Company with effect from 06.09.2021.
vi.That the Company had continuously defaulted under section 170(2) and the rules made their under for the period of 2723 days (i.e., from 24.03.2014 to 06.09.2021).
II.Thus, in view of above, the adjudicating officer has reasonable cause to believe that the subject company has not complied with the provision of Section 170(2) of the Companies Act, 2013 and Rule 18 of the Companies (Appointment and Qualification of Directors) Rules, 2014 and the noticees are required to show cause as to why they should not be penalized u/s 172 for the said non-compliance

2. The company in its response to e-SCN dated 12.02.2026 requested a personal hearing in the matter and the same has been conducted on 30-03-2026.

E.Order:

1. Upon examination of the records, submissions made by the company, and applicable provisions of law, the following is observed:
i. In FY 2013-14, Board appointed Mr. Satya Narain Gupta as an Additional Director.
ii. DIR-12 was required to be filed under Section 161(1) & 170(2).
iii. Due to error, designation was filed as Director instead of Additional Director.
iv. Post AGM, regularisation could not be done due to system constraints.
v. Default continued till demise on 06.09.2021.
vi. The company incorrectly recorded designation and failed to rectify for 2723 days. The plea of technical limitation is not acceptable. Hence, violation is established. In its response to the e-SCN, the company submitted that Mr. Deepak Gupta (DIN 00703704) has been designated as officer in default vide resolution dated 08-12-2015 and filed GNL 3 vide SRN AC1731895 for the same. Therefore, liability of default is attributable accordingly.
Total default period: 2723 days.In this regard relevant Provisions which are violated are as
Section 170(2): Filing of director details Rule 18 Filing of DIR-12 within 30 days.
Section 172: Penalty provisions.
5. Penalty Calculation Base penalty: 50,000 Continuing penalty: 500 ? 2723 = ?13,61,500
Subject to maximum Company: 3,00,000 Officer in default: 1,00,000 each
In exercise of the powers conferred under Section 454(3) of the Companies Act, 2013, the undersigned hereby imposes the following penalties have been imposed .Company: 3,00,000 Officer in Default Mr.Deepak Gupta (DIN 00703704): 1,00,000
Note: The e-SCN was issued by erstwhile RoC, Delhi and Haryana . Subsequent to the bifurcation of offices effective from 16-02-2026, the subject company?s jurisdiction changed to ROC, Delhi-II. According, this order is issued by this office.
Further, during the present adjudication proceedings, from the material/documents on record(s), prima facie non-compliance(s) as mentioned above have been noticed. In the present adjudication proceeding(s), the non- compliance(s) mentioned above is only being adjudicated and the non-compliances if any, involving aforesaid or any other section under provision of Companies Act, 2013 shall be taken up separately in accordance with the law for necessary action, if any.

2. The details of penalty imposed on the company, officers in default and others are shown in the table below:

(A)	Name of person on whom penalty imposed (B)	Rectification of Default required (C)	Penalty Amount (D)	Additional Penalty (E) (*Per day of continuing default i.e. date of rectification of default less order issue date)	Maximum limit for Penalty (F)
1	BHARAT PET LIMITED having CIN as U25209DL1998PLC091888		300000	0	300000
2	SUBHASH CHANDER having DIN as 00802157		0	0	100000
3	MEENA GUPTA having DIN as 00704207		0	0	100000
4	DEEPAK GUPTA having DIN as 00703704		100000	0	100000
5	VINOD KUMAR having DIN as 06521597		0	0	100000
6	SATYA NARAIN GUPTA having DIN as 00802433		0	0	100000

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3. The notified officers in default/noticee shall rectify the default mentioned above and pay the penalty, so applicable within 90 days of receipt of the order.

4. The notified officers in default/noticee shall pay the penalty amount via ‘e-Adjudication’ facility which can be accessed through the respective login IDs on the website of Ministry of Corporate Affairs and upload the copy of paid challan / SRN of e-filing (if applicable) on the ‘e-Adjudication’ portal itself. It is also directed that the penalty so imposed upon the officers in default shall be paid from their personal sources/income.

5. Appeal against this order may be filed in writing with the Regional Director, RD Delhi within a period of sixty days from the date of receipt of this order, in Form ADJ setting for the grounds of appeal and shall be accompanied by a certified copy of this order [Section 454 (5) & 454 (6) of the Act, read with Companies (Adjudication of Penalties) Rules, 2014].

6. For penal consequences of non-payment of penalty within the prescribed time limit, please refer Section 454(8) of the Companies Act, 2013.

Signature Not Verified

Digitally signed by
DS MINISTRY OF CORPORATE AFFAIRS , ROC NCT OF DELHI-II
Date: 2026.04.07 19:30:23 IST

Gaurav 1,
Registrar of Companies
ROC Delhi

To,

1. BHARAT PET LIMITED, PLOT. I -12, DSIDC INDUSTRIEAL COMPLEX ROHTAK ROAD, NANGLOI NEW DELHI WEST DELHI DELHI INDIA 110041, info@bpl.net.in

2. SUBHASH CHANDER, B-10, BHAGWAN DASS NAGAR EAST PUNJABI BAGH NEW DELHI DELHI INDIA 110026, reminder@bpl.net.in

3. MEENA GUPTA, B-10 BHAGWAN DASS NAGAR EAST PUNJABI BAGH NEW DELH DELHI INDIA 110026, info@bpl.net.in

4. DEEPAK GUPTA, 10/61, WEST PUNJABI BAGH NEW DELHI DELHI INDIA 110026, deepak@bpl.net.in

5. VINOD KUMAR, 1210, SHTIYA PANA VILL POOTH KHURD DELHI DELHI INDIA 110039, info2@bpl.net.in

6. SATYA NARAIN GUPTA, 10/61, WEST PUNJABI BAGH NEW DELHI DELHI INDIA 110026, bpi.bajaj@gmail.com