

FORM NO. MGT-9
EXTRACT OF ANNUAL RETURN
As on the financial year ended on 31.03.2019
[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the
Companies (Management and Administration) Rules, 2014)

I. REGISTRATION & OTHER DETAILS:

| | | |
|------|---|---|
| i. | CIN | L72200TG1985PLC041126 |
| ii. | Registration Date | 13.03.1985 |
| iii. | Name of the Company | VAMA INDUSTRIES LIMITED |
| iv. | Category/ Sub-Category of the Company | Public Limited Company/Limited by Shares |
| v. | Address of the Registered office and Contact Details | Ground Floor, 8-31-191/147/24, B-12, Madhura Nagar, Hyderabad – 500038 Ph. No : 040-66619919 E-mail ID: cs@vama.co.in Web Site: www.vamaind.com |
| vi. | Whether Listed Company | Yes |
| vii. | Name, Address and Contact details of Registrar and Transfer Agent | Bigshare Services Pvt. Ltd 306, 3rd Floor, Right Wing, Amrutha Ville Opp. Yashoda Hospital, Raj Bhavan Road, Somajiguda , Hyderabad- 500082. Mobile: 9848098088 |

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the Business activities contributing 10 % or more of the total turnover of the Company shall be stated:

| S. No. | Name and Description of main products / services | NIC Code of the products / services | % to total turnover of the company |
|--------|--|-------------------------------------|------------------------------------|
| 1 | IT, ITES and System Integration, Hardware & Software, Installation support and Maintenance | 4651 & 6202 | 100 |

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES :

| S. No | Name and Address of the Company | CIN/GLN/UIN | Holding/ Associate/ Subsidiary | % of Shares held | Applicable Section |
|-------|--|---------------|--------------------------------|------------------|--------------------|
| 1 | Vama Technologies Pte Ltd 10, Jalan Besar, #10-03, Sim Lim Tower, Singapore – 208787 | HYWAZ20161408 | Wholly Owned Subsidiary | 100 | 2(87)(ii) |

IV. SHARE HOLDING PATTERN (EQUITY SHARE CAPITAL BREAKUP AS PERCENTAGE OF TOTAL EQUITY):
i) Category-wise Shareholding

| Category of Shareholder | No. of Shares held at the beginning of the Year | | | | No. of Shares held at the end of the year | | | | % Change during the year |
|--|---|--------------|-----------------|---------------|---|--------------|-----------------|---------------|--------------------------|
| | Demat Shares | Physical | Total | % of | Demat Shares | Physical | Total | % of Total | |
| A. Promoters | | | | | | | | | |
| 1. Indians | | | | | | | | | |
| a) Individual/HUF | 22561830 | - | 22561830 | 42.94 | 22561830 | - | 22561830 | 42.94 | - |
| b) Central Govt | - | - | - | - | - | - | - | - | - |
| c) State Govt | - | - | - | - | - | - | - | - | - |
| d) Bodies Corporate | - | - | - | - | - | - | - | - | - |
| e) Banks/FI | - | - | - | - | - | - | - | - | - |
| f) Any other | - | - | - | - | - | - | - | - | - |
| Sub Total (A) (1) | 22561830 | - | 22561830 | 42.94 | 22561830 | - | 22561830 | 42.94 | - |
| 2. Foreign | | | | | | | | | |
| a) NRI - Individuals | - | - | - | - | - | - | - | - | - |
| b) Other Individuals | - | - | - | - | - | - | - | - | - |
| c) Bodies Corporate | - | - | - | - | - | - | - | - | - |
| d) Banks / FI | - | - | - | - | - | - | - | - | - |
| e) Any other | - | - | - | - | - | - | - | - | - |
| Sub Total (A) (2) | - | - | - | - | - | - | - | - | - |
| Total Shareholding of Promoter | | | | | | | | | |
| A= (A)(1) + (A)(2) | 22561830 | - | 22561830 | 42.94 | 22561830 | - | 22561830 | 42.94 | - |
| B. Public Shareholding | | | | | | | | | |
| 1. Institutions | | | | | | | | | |
| a) Mutual Funds | - | - | - | - | - | - | - | - | - |
| b) Banks / FI | - | - | - | - | - | - | - | - | - |
| c) Central Govt. | - | - | - | - | - | - | - | - | - |
| d) State Govt. | - | - | - | - | - | - | - | - | - |
| e) Venture Capital Funds | - | - | - | - | - | - | - | - | - |
| f) Insurance Companies | - | - | - | - | - | - | - | - | - |
| g) FII's | - | - | - | - | - | - | - | - | - |
| h) Foreign Venture Capital Funds | - | - | - | - | - | - | - | - | - |
| i) Others | - | - | - | - | - | - | - | - | - |
| Sub Total (B) (1) | - | - | - | - | - | - | - | - | - |
| 2. Non Institutions | | | | | | | | | |
| a) Bodies Corp. | | | | | | | | | |
| i) Indian | 5579827 | - | 5579827 | 10.62 | 5531923 | - | 5531923 | 10.53 | (0.09) |
| ii) Overseas | - | - | - | - | - | - | - | - | - |
| b) Individuals | | | | | | | | | |
| i) Individual shareholders holding nominal share capital upto Rs. 1 lakh | 5615966 | 93600 | 5709566 | 10.87 | 5336933 | 93600 | 5430533 | 10.34 | (0.53) |
| ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh | 17908815 | 0 | 17908815 | 34.09 | 18638954 | 0 | 18638954 | 35.48 | 1.39 |
| c) Others | 779962 | 0 | 779962 | 1.48 | 376760 | 0 | 376760 | 0.72 | (0.76) |
| Sub-total (B) (2) | 29884570 | 93600 | 29978170 | 57.06 | 29884570 | 93600 | 29978170 | 57.06 | (0.00) |
| Total Public Shareholding (B)=(B)(1)+(B)(2) | 29884570 | 93600 | 29978170 | 57.06 | 29884570 | 93600 | 29978170 | 57.06 | (0.00) |
| C. Shares held by Custodian for GDRs & ADRs | | | | | | | | | |
| | - | - | - | - | - | - | - | - | - |
| Grand Total (A+B+C) | 52446400 | 93600 | 52540000 | 100.00 | 52446400 | 93600 | 52540000 | 100.00 | (0.00) |

ii) Shareholding of Promoter

| Sl. No | Shareholders Name | Shareholding at the beginning of the year | | | Shareholding at the end of the year | | | % Change in shareholding during the year |
|--------|----------------------|---|---------------------------------|---|-------------------------------------|---------------------------------|---|--|
| | | No of Shares | %of total shares of the company | % of Shares Pledged/ encumbered to total shares | No of Shares | %of total Shares of the company | % of Shares Pledged/ encumbered to total shares | |
| 1. | V.Atchyuta Rama Raju | 12555120 | 23.90 | NA | 12555120 | 23.90 | NA | 0 |
| 2. | V. Rajam Raju | 5802500 | 11.04 | NA | 5802500 | 11.04 | NA | 0 |
| 3. | G.A. Rama Raju | 2997210 | 5.70 | NA | 2997210 | 5.70 | NA | 0 |
| 4. | Bangarraju Mudundi | 90000 | 0.17 | NA | 90000 | 0.17 | NA | 0 |
| 5. | V. Sarada | 85000 | 0.16 | NA | 85000 | 0.16 | NA | 0 |
| 6. | M. Krishnaveni | 84000 | 0.16 | NA | 84000 | 0.16 | NA | 0 |
| 7. | V. Pushpavathi | 70000 | 0.13 | NA | 70000 | 0.13 | NA | 0 |
| 8. | Mohan RajuIndukuri | 53500 | 0.10 | NA | 53500 | 0.10 | NA | 0 |
| 9. | Uma Vani Indukuri | 50000 | 0.10 | NA | 50000 | 0.10 | NA | 0 |
| 10. | V Parvathi | 774500 | 1.47 | NA | 774500 | 1.47 | NA | 0 |
| | TOTAL | 22561830 | 42.94 | NA | 22561830 | 42.94 | NA | 0 |

iii) Change in Promoters' Shareholding (please specify, if there is no change)

There is no change in the Shareholding pattern of Promoters during the financial year 2018-19

iv) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 1. | Anil Unnikrishnan | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 6700000 | 12.75 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 6700000 | 12.75 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|--|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 2. | Nirant Technologies Private Limited | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 2500000 | 4.76 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 2500000 | 4.76 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|--|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 3. | Sainaren Properties Private Limited | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 2000000 | 3.81 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 2000000 | 3.81 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|----------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 4. | Nitin Siddamsetty | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 1657781 | 3.16 | | |
| | Changes during the Year | 01-06-2018 | Transfer | 1 | negligible | 1657782 | 3.16 |
| | At the end of the year | 31.03.2019 | | | | 1657782 | 3.16 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 5. | V V S Murty | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 800000 | 1.52 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 800000 | 1.52 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|----------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 6. | Grandeur Products Limited | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 771255 | 1.47 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 771255 | 1.47 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 7. | Subba Rao Vitakula | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 750000 | 1.43 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 750000 | 1.43 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 8. | T V APPARAO | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 725445 | 1.38 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 725445 | 1.38 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 9. | N Ramesh Kumar | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 392336 | 0.75 | | |
| | Changes during the Year | 14.12.2018 | Sale | (3500) | (0.0067) | 388836 | 0.74 |
| | At the end of the year | 31.03.2019 | | | | 388836 | 0.74 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|---------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 10. | Jayarama Prasad Munnangi | | No. of | | | | |
| | At the beginning of the year | 01.04.2018 | | 330450 | 0.63 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 330450 | 0.63 |

v) Shareholding of Directors and Key Managerial Personnel:

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 1. | V. Atchyuta Rama Raju | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 12555120 | 23.90 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 12555120 | 23.90 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 2. | V. Rajam Raju | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 5802500 | 11.04 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 5802500 | 11.04 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 3. | K. Vara Prasad Raju | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 1500 | Negligible | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 1500 | Negligible |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|--------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 4. | Rama Sravanthi Rambatla | | | | | | |
| | At the beginning of the year | 01.04.2018 | | Nil | Nil | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | Nil | Nil |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 5. | Vitakula Srinivas | | | | | | |
| | At the beginning of the year | 01.04.2018 | | Nil | Nil | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | Nil | Nil |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|-------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 6. | K. Venkata Krishna Rao | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 34750 | 0.07 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 34750 | 0.07 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 7. | Gavireddy Siva | | | | | | |
| | At the beginning of the year | 01.04.2018 | | 4880 | 0.009 | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | 4880 | 0.009 |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 8. | *M K Bhaskara Teja | | | | | | |
| | At the beginning of the year | 01.04.2018 | | Nil | Nil | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | Nil | Nil |

| Sl. No | Particulars | Date | Reason | Shareholding at the beginning of the year | | Cumulative Shareholding during the year | |
|--------|------------------------------|------------|--------|---|----------------------------------|---|----------------------------------|
| | | | | No. of shares | % of total shares of the company | No. of shares | % of total shares of the company |
| 9. | **Vandana Modani | | | | | | |
| | At the beginning of the year | 01.04.2018 | | Nil | Nil | | |
| | Changes during the Year | Nil | Nil | Nil | Nil | Nil | Nil |
| | At the end of the year | 31.03.2019 | | | | Nil | Nil |

*Resigned w.e.f 04.11.2018

**Appointed w.e.f 05.11.2018

V. INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment

| | Secured Loans excluding deposits | Unsecured Loans | Deposits | Total Indebtedness |
|--|-------------------------------------|--------------------|----------|-----------------------|
| Indebtedness at the beginning of the financial year | | | | |
| i) Principal Amount | 3,95,86,436 | 3,54,00,564 | - | 7,49,87,000 |
| ii) Interest due but not paid | - | - | - | |
| iii) Interest accrued but not due | - | | - | |
| Total (i +ii+iii) | 3,95,86,436 | 3,54,00,564 | - | 7,49,87,000 |
| Change in Indebtedness during the financial year | | | | |
| Addition | 37,829,950 | 12,660,931 | - | 50,490,881 |
| Reduction | 541,013 | 14,643,567 | - | 15,184,580 |
| Net Change | 37,288,937 | (1,982,636) | | 35,306,301 |
| Indebtedness at the end of the financial year | - | - | - | - |
| i) Principal Amount | 76,875,373 | 33,417,928 | - | 110,293,301 |
| ii) Interest due but not paid | - | - | - | |
| iii) Interest accrued but not due | - | | - | |
| Total (i +ii+iii) | 76,875,373 | 33,417,928 | - | 110,293,301 |

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

| Sl. No | Particulars of Remuneration | Name of MD/WTD/ Manager | | Total Amount |
|--------|---|------------------------------|--------------------|------------------|
| | | MD: V. Atchyuta Rama Raju | WTD: V. Rajam Raju | |
| 1 | Gross salary | 19,80,000 | 18,00,000 | 37,80,000 |
| a | Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 | 19,80,000 | 18,00,000 | 37,80,000 |
| b | Value of perquisites u/s 17(2) Income-tax Act, 1961 | Nil | Nil | Nil |
| c | Profits in lieu of salary under section 17(3) Income-tax Act, 1961 | Nil | Nil | Nil |
| 2 | Stock Option | Nil | Nil | Nil |
| 3 | Sweat Equity | Nil | Nil | Nil |
| 4 | Commission | Nil | Nil | Nil |
| | -as % of profit | Nil | Nil | Nil |
| | -others | Nil | Nil | Nil |
| 5 | Others | Nil | Nil | Nil |
| | Total | 19,80,000 | 18,00,000 | 37,80,000 |
| | Ceiling as per the Act | 84 Lakhs | 84 Lakhs | |

B. Remuneration to other directors: NIL

None of the Directors of the Company other than mentioned above were paid any remuneration during the financial year. In addition, no performance linked incentives were paid to any of the directors of the company.

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER / WTD

₹

| Sl. No | Particulars of Remuneration | Key Managerial Personnel | | | |
|--------|---|---|---|-------------------------|------------------|
| | | *M K Bhaskara Teja (Company Secretary) | **Vandana Modani (Company Secretary) | Gavireddy Siva (CFO) | Total |
| 1. | Gross salary | 3,90,000 | 1,50,000 | 10,64,000 | 16,04,000 |
| | (a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961 | 3,90,000 | 1,50,000 | 10,64,000 | 16,04,000 |
| | (b) Value of perquisites u/s 17(2) Income-tax Act, 1961 | Nil | Nil | Nil | Nil |
| | (c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961 | Nil | Nil | Nil | Nil |
| 2. | Stock Option | Nil | Nil | Nil | Nil |
| 3. | Sweat Equity | Nil | Nil | Nil | Nil |
| 4. | Commission -as % of profit -others | Nil Nil | Nil Nil | Nil Nil | Nil Nil |
| 5. | Others | Nil | Nil | Nil | Nil |
| | Total | 3,90,000 | 1,50,000 | 10,64,000 | 16,04,000 |

*Mr. M.K. Bhaskara Teja resigned from the office of the Company Secretary with effect from 04.11.2018

**Ms Vandana Modani was appointed on 05.11.2018.

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES: NIL

| Type | Section of the Companies Act | Brief Description | Details of Penalty / Punishment/ Compounding fees imposed | Authority [RD / NCLT / COURT] | Appeal made, if any (give Details) |
|--|------------------------------|-------------------|---|-------------------------------|------------------------------------|
| A. COMPANY | | | | | |
| Penalty Punishment Compounding B. DIRECTORS Penalty Punishment Compounding C. OTHER OFFICERS IN DEFAULT Penalty Punishment Compounding | NOT APPLICABLE | | | | |