

Reference No. IOVRVF/2026-27/356

[AUTHORITY DELEGATED BY THE MINISTRY OF CORPORATE AFFAIRS  
UNDER CLAUSE X, SUB CLAUSE-24(2) OF THE PART-II OF ANNEXURE III OF  
THE COMPANIES (REGISTERED VALUERS AND VALUATION) RULES, 2017]

## ORDER

This Order disposes the **Show Cause Notice (SCN) No. IOV-RVF/2025-26/1256** dated November 18, 2025 issued to **Mohamed Abdul Rahim ("Registered Valuer")** under the point No. 23 of Annexure-III, Part-II i.e. Model Bye-laws of RVO issued under the Company (Registered Valuers and Valuation) Rules, 2017 ("**Valuation Rules**"). Mr. Mohamed Abdul Rahim is a member of IOV Registered Valuer Foundation ("**IOV RVF**" / "**Organisation**" / "**RVO**") and Insolvency and Bankruptcy Board of India ("**IBBI**" / "**Authority**") for the asset class Land and Building, having Membership No. **IOVRVF/VM/L&B/3082** and Registration no. **IBBI/RV/02/2019/11317** respectively.

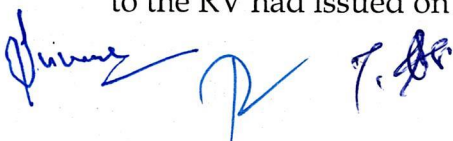
### 1. Background

1.1. Point 23 (a) of Annexure-III, Part-II i.e. Model Bye- laws of RVO issued under the Valuation Rules provides that the Organisation may initiate disciplinary proceedings by issuing a show-cause notice against members based on a reference made by the Grievances Redressal Committee;

1.2. Point 21 (3) of Annexure-III, Part-II i.e. Model Bye- laws of RVO issued under the Valuation Rules, the Grievance Redressal Committee ("**GRC**") shall refer the matter to the Disciplinary Committee, wherever the grievance warrants disciplinary action. GRC vide its letter dated June 14, 2025, has referred the matter to the Disciplinary Committee due to Violation of following provisions:

- Serial Number 7 of Addendum to Form-A, Part E (4) issued by the Authority under the Valuation Rules, 2017;
- Point 26 of XI of Annexure III, Part-II i.e. Model Bye- laws of RVO as prescribed under Valuation Rules; and
- Rule 7 (b), (e) and (g) of the Valuation Rules by the RV.

1.3. Upon consideration of the materials available on records, Disciplinary Committee initiated the proceedings and in view of point 24 (1) (b) of Annexure-III, Part-II i.e. Model Bye- laws of RVO as prescribed under Valuation Rules, SCN to the RV had issued on November 18, 2025



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## 2. Examination of contraventions alleged in the SCN

The contravention alleged in the SCN is summarized as under:-

### 2.1. Violation of Serial Number 7 of Addendum to Form-A, Part E (4) issued under the Valuation Rules.

The said provision provided that, *"a Registered Valuer cannot be under any employment"*.


RV was appointed in M/s **Stiffeners Property Valuers & Consultants India Private Limited ("SPVC")** on November 23, 2023, as a Promoter director after becoming registered valuer having CIN No. U68100TN2023PTC165455. As per the above provision, a registered valuer shall not be in employment during the validity of registration. Being a promoter director RV is eligible to draw a salary from the company due to his fulltime directorship. The position held by the RV was in the nature of an executive/promoter directorship carrying managerial responsibilities, which is inconsistent with the requirement that a Registered Valuer shall not be in employment.

### 2.2. Violation of Point 26(1) of XI i.e. Surrender of Membership of Annexure III, Part -II i.e. Model Bye Laws of the Registered Valuers Organization (RVO) as prescribed under the Valuation Rules.

The said provision provides that *"a member shall make an application for temporary surrender of his membership at least 30 days before his takes up the employment"*.

RV has also failed to inform the RVO of the subsequent change in his employment status, thereby violating the obligations under the said provision as mentioned above.

### 2.3. Violation of Point 11 of Annexure III, Part -II i.e. Model Bye Laws of the Registered Valuers Organization (RVO) as prescribed under the Valuation Rules.



The said provision provides that, "an organization may require the members to pay a fixed sum of money as its annual membership fee".

At the time of issuance of SCN, RV was non-compliant and have failed to pay the Annual Membership Fee for the F.Y. 2025-2026.

#### 2.4. Rule 7 (b) of the Valuation Rules.

The said provision provides that "a member shall always comply with the provisions of the Act, Rules and the Byelaws or internal regulations as the case may be of the respective RVO".

As per the Training & CEP Policy and Guidelines on Certificate of Membership and Practice (COMP) issued by the IOV RVF, Every Registered Valuer Member shall

- Undertake a minimum 10 Credit Hours\* of CPE/CEP in each financial year starting from April 01, 2024 and;
- Minimum 48 Credit Hours\* of CPE/CEP in each rolling block of 3\* years starting from April 01, 2024 to March 31, 2027", failing which, Certificate of Membership and Practice shall not be renewed.

At the time of issuance of the SCN RV also failed to attend the required number of Continuing Professional Education (CPE) programs for the F.Y. 2024-2025 and you have also failed to submit the Form M-3.

### 3. Reply from the RV

3.1. Registered Valuer replied via email dated December 08, 2025, stating as under

Sir,

I am in receipt of your show cause notice dated 18.11.2025 and wish to reply to you as follows:

1. I wish to submit that on the outset that I hereby deny the allegations and averments made in the show cause notice, except those that are specifically admitted hereunder.

2. I wish to submit that, I registered as an individual valuer with Insolvency and Bankruptcy Board of India (IBBI) on April 15, 2019, operating under my proprietorship, M/s Stiffeners Property Valuation Consultants. In 2020, an attempt to convert this proprietorship into SPVC Private Limited was initiated but struck off due to procedural delays. The entity remained non-operational and never undertook any valuation assignments, as evidenced by:



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- i. No GST registration until November 2024.
- ii. MCA documentation confirming its "struck off" status.
- iii. No valuation work conducted under this entity.

3. I wish to state that due to its non-functional status, I did not disclose that I was the director in the above company, during the registration with IBBI in the year 2019. I was not under any active employment in the said entity since nothing was functioning or operating.

4. I wish to state that thereafter, the SPVC India Private Limited was incorporated on November 23, 2023, but remained non operational until November 28, 2024, due to pending GST registration.

5. That thereafter, I wish to state that the IOV RVF Foundation, vide email dated 14.06.2025, had stated that based on a complaint, disciplinary action was being initiated against me in accordance with Rule 21(3) of Annexure III-Governance Structure and Model Bye Laws for Registered Valuers Organization issued under the Companies Registered (Valuers and Valuation) Rules, 2017, for failing to inform the RVO of being a director in M/s. SPVC India Private Limited post registration with IBBI.

6. I wish to state that in reply to the above disciplinary action, vide email dated 16.06.2025, I had issued a detailed explanation to the above allegation and disciplinary action initiated, stating that at that relevant point of time, the company was non-operative and my role as a director was not a functional role and hence I was not under any active employment. Further, I had also undertook to shift my role in the company to a Non-Executive Director, with only managerial responsibilities, with no active employment or role in the said company. I had also submitted that I had cleared all my outstanding membership fees and all the other procedural requirements such as M3, M4 and CEP requirements will be undertaken to be completed and hence ensured my compliance to the Valuation Rules 2017.

7. I wish to state that thereafter, as undertaken by me, I had transitioned into a Non-Executive Director in the above said company presently and I have cleared all outstanding dues and complied with all the statutory requirements.

8. I wish to state that in this regard, despite of the above clarification and undertaking and my present status of non-employment and compliances, the present show cause notice has been issued to me.

9. I wish to state that the averments made in para 1 and 2 of the show cause notice are all facts concerning the provision of law and powers of IOV and therefore require no reply.

10. I wish to state that the averments and allegations made in Para 3 and proceeding paragraphs are answered and replied as follows:

a. I wish to state that the averments and allegations made in Para

3.1 that Serial Number 7 of Addendum to Form-A, Part E (4) of the Valuation Rules, 2017, which provided that a Registered Valuer cannot be under any employment at the time of registration and throughout the period of registration as well and that being as a Promoter director i.e. Whole Time Director in M/s Stiffeners Property Valuers & Consultants India Private Limited ("SPVC") having CIN No. U68100TN2023PTC165455 (attached MCA Master data as Annexure 1), considered an employee of the SPVC, is wholly false and denied. I wish to state that the above company is a non-functioning entity with no revenue or operation and I have not performed any functional activity or role in that company and



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hence it is more so a dead company which was alive only on paper and therefore I cannot be deemed to be an employee of that company. Further, I wish to state that the same was not mentioned during registration only to the above fact that the company itself was defunct and I had no active employment.

b. Further, I wish to state that I am presently a non-executive director in the above said company and am functioning in only a managerial responsibility with no active role and hence not employed, in compliance with the Rules.

c. That the averments and allegations made in Para 3.2 that Point 26(1) of XI i.e. Surrender of Membership of Annexure III, Part II i.e. Model Bye Laws of the Registered Valuers Organization (RVO) as prescribed under the Valuation Rules, 2017 provides that, a member shall make an application for temporary surrender of his membership at least 30 days before his takes up the employment and that I have also failed to inform the RV of the subsequent change in your employment status, thereby violating the obligations under the said Rules as mentioned above, are all false and denied. I wish to state and reiterate that I was not under any active employment in any company and the above company that is being alleged, is a defunct company where neither did I nor did the company perform any active functioning. I was not receiving any salary or revenue or profit from and out of the said company and hence, I had rightly not informed about my employment status, which was non-existent.

d. That the averments and allegations made in Para 3.3 that Non- payment of Annual Membership Fee: Rule 1 of Annexure III of Companies (Registered Valuers and Valuation) Rules, 2017 ("Rules"), an organization may require the members to pay a fixed sum of money as its annual membership fee and that I have failed to pay the Annual Membership Fee for F.Y. 2025-2026, are all false and denied. I wish to state that I have cleared and paid all outstanding dues and my fees up to date and I hereby undertake to pay the same on time without default.

e. That the averments and allegations made in Para 3.4 that Rule 7 (b) of the Valuation Rules, 2017 provides that a member shall always comply with the provisions of the Act, Rules and the Byelaws or internal regulations. As per the Training & CEP Policy and Guidelines on Certificate of Membership and Practice (COMP) issued by the IOV RVF, Every Registered Valuer Member shall undertake a minimum 10 Credit Hours of CPE/CEP in each financial year starting from April 01, 2024 and a Minimum 48 Credit Hours of CPE/CEP in each rolling block of 3 years starting from April 01, 2024 to March 31, 2027 to earn minimum mandatory credit of 48 CPE/CEP hours in three financial year.", failing which, Certificate of Membership and Practice shall not be renewed and that no carry forward of any excess or short CEP credit hours shall be allowed to the next block to any Registered Valuer Member and that I have failed to attend the required number of Continuing professional education (CPE) programs for the F.Y. 2024 2025 and I have also failed to submit the Form M-3, are all false and denied. I wish to state that I hereby undertake to and comply and attend all the required number of CPE for 2024 2025 without fail.

11. I wish to state that I have complied with all rules and regulations and Bye Laws of the Valuation Rules 2017 and I have not committed any of the alleged violations as noted in your show cause notice and I am ready and willing to abide and comply with the rules and any condition that may be imposed for me to comply or to submit any additional documents as may be required to show my compliance and adherence to the rules.

Hence, I kindly request you to take this reply on record and withdraw the present show cause notice or any other proceedings against me and do the needful in this regard.



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#### 4. Findings of the Disciplinary Committee

4.1. The Disciplinary Committee, vide email dated December 26, 2025, sought clarification from the Registered Valuer ("RV"), as the response submitted to the Show Cause Notice ("SCN") was unsupported by documentary evidence. The RV was granted one week's time to submit supporting documents. The details sought from the RV are reproduced below:-

1. *Documentary evidence, that in the year 2020, an attempt was made to convert the proprietorship concern into SPVC Private Limited; however, the same was struck off due to procedural delays. You have further stated that the said entity remained non-operational and did not undertake any valuation assignments, as evidenced by the absence of GST registration until November 2024 and MCA records reflecting its "struck off" status.*
2. *Documentary evidence, that SPVC India Private Limited was incorporated on 23 November 2023, but remained non-operational until 28 November 2024 on account of the pendency of GST registration.*
3. *Documentary evidence, that you had undertaken to shift your role in the company to that of a Non-Executive Director.*

4.2. RV, vide email dated March 16, 2026, submitted a copy of Form DIR-12 reflecting the change in designation from Promoter Director to Non-Executive Director with effect from June 09, 2025.

4.3. Subsequently, another email was sent to the RV on March 18, 2026, where he was asked to submit the following documents:

- 1) ITRs FROM F.Y. 2023 TO 2025 OF MOHAMED ABDUL RAHIM;
- 2) ITRs FROM F.Y. 2023 TO 2025 OF STIFFENERS PROPERTY VALUERS & CONSULTANTS INDIA PRIVATE LIMITED;
- 3) BALANCE SHEET FROM F.Y. 2023 TO 2025 OF STIFFENERS PROPERTY VALUERS & CONSULTANTS INDIA PRIVATE LIMITED;
- 4) MGT 7 AND AOC-4 FILED WITH ROC FOR F.Y. 2023-2025 OF STIFFENERS PROPERTY VALUERS & CONSULTANTS INDIA PRIVATE LIMITED;

4.4. On March 19, 2026, RV submitted all documents as sought by the Disciplinary Committee.

4.5. The Disciplinary Committee has carefully examined the reply submitted by the RV and the documents available on record.

(a) The disclosure of employment and professional engagements by a Registered Valuer is a *sine qua non* to the framework of the Valuation Rules and cannot be treated as a mere procedural formality. Such

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disclosures are fundamental to ensuring transparency, independence, objectivity, and professional integrity in the valuation ecosystem. Any concealment, suppression, or non-disclosure of material particulars relating to employment or professional association undermines the credibility expected from a Registered Valuer and constitutes a breach of the standards prescribed under Rule 7 of the Valuation Rules read with the Model Code of Conduct contained in Annexure-I thereto.

- (b) The contention raised by the RV that he was not drawing any salary from the Company is untenable. The mere fact that a director chooses not to draw remuneration is a matter of personal choice and does not absolve him of the liabilities and obligations attached to such position.
- (c) As regards to the explanation furnished by the RV concerning **Point 26(1) of Chapter XI (Surrender of Membership) of Annexure III, Part-II, i.e., the Model Bye-Laws**, the same is not acceptable. The mere fact that the company was non-functional, without revenue or operations, and that the RV allegedly did not perform any active role therein, does not absolve him from his status as a Promoter Director. The records available before the Committee indicate that the RV changed his designation from Promoter Director to Non-Executive Director only on June 09, 2025, whereas the grievance against the RV was received on February 21, 2025. Therefore, at the relevant point in time, the RV continued to act as a Promoter Director. The plea that the company itself was defunct is immaterial to the issue under consideration.
- (d) With respect to the violation of **Point 11 of Annexure III, Part-II of the Model Bye-Laws of the Registered Valuers Organisation and Rule 7(b) of the Valuation Rules**, the RV, in his reply, undertook to complete the pending Continuing Professional Education ("CPE") requirements for FY 2024-25 and to pay the Annual Membership Fee for FY 2024-25. It is observed that certain pending compliances were completed only during the pendency of the present disciplinary proceedings. Such delayed and partial compliances do not absolve the earlier defaults committed by the RV. Further, the RV continues to remain non-compliant in respect of certain requirements for FY 2025-26 and FY 2026-27. A tabular representation of the same is reproduced below:



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| Financial Year | Annual Membership Fee | M3 (Yearly)          | M4 (Apr to Sep)             | M4 (Oct to Mar)               | CEP Points         | Membership Status        |
|----------------|-----------------------|----------------------|-----------------------------|-------------------------------|--------------------|--------------------------|
| 2026-27        | Pending (2026-27)     | Not Filled (2025-26) | Approved (Apr-25 to Sep-25) | Not Filled (Oct-25 to Mar-26) | Pending (2025-26)  | Semi Compliant (2026-27) |
| 2025-26        | Success (2025-26)     | Not Filled (2024-25) | Approved (Apr-24 to Sep-24) | Approved (Oct-24 to Mar-25)   | Complete (2024-25) | Semi Compliant (2025-26) |
| 2024-25        | Success (2024-25)     | Approved (2023-24)   | Approved (Apr-23 to Sep-23) | Approved (Oct-23 to Mar-24)   | Complete (2023-24) | Compliant (2024-25)      |

- (e) The conduct of the RV is contrary to the letter, spirit, and mandate of the Valuation Rules, particularly Rule 7 relating to conditions of registration. Failure to disclose employment status constitutes a grave violation of the Valuation Rules, 2017 and renders the RV liable for disciplinary action. Merely shifting the role from Promoter Director to Promoter Non-Executive Director does not absolve the RV of his continuing obligation to make full and true disclosures under the Valuation Rules.
- (f) The RV submitted that he was not fully aware of the regulatory implications attached to holding such association/directorship in the company after obtaining registration as a Registered Valuer and membership with the Registered Valuers Organisation ("RVO"). Upon being apprised of the same during the present proceedings, the RV acknowledged the lapse and undertook corrective measures by changing his designation from Promoter Director to Non-Executive Director and by completing certain pending compliances.

The RV has further assured the Disciplinary Committee that he shall remain cautious in future and shall not repeat such non-compliances. He has also undertaken to maintain the standards of transparency, independence, objectivity, and professional integrity expected from a Registered Valuer under the Valuation Rules and the Model Code of Conduct. However, the Committee is of the view that lack of awareness of regulatory requirements cannot completely absolve the RV from his obligations under the Valuation Rules.

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## 5. Decision

- 5.1. Based on the above finding, the Disciplinary Committee in exercise of power conferred under Clause 24 sub clause 2 (b) and (e) of the Para X of Part II (Model Bye-Laws of a Registered Valuers Organization) of Annexure III of the Companies (Registered Valuers and Valuation) Rules, 2017, hereby suspend the membership of RV for the period of 3 months.
- 5.2. In terms of point 8.7 of the Disciplinary Policy of IOVRVF, the directions of this order shall become effective after 30 days of the receipt of this order to the registered valuer

5. The Show Cause Notice is accordingly disposed of.

## 6. Appeal

In case the Registered Valuer is aggrieved by the order passed by the Disciplinary Committee, he may prefer an appeal before the Appellate Authority of IOV RVF within thirty days from the receipt of this order.


## 7. IBBI


A copy of this order shall be forwarded to IBBI ("Authority") for future course of action.


Given under seal of the Disciplinary Committee of IOV-RVF, this the day of 4<sup>th</sup> June, 2026.

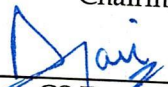
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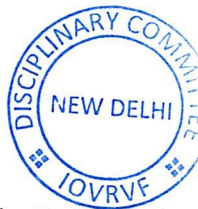
Place:- Delhi

  
Shri Sunil Kumar Khosla  
Chairman

  
Shri Ramesh Kumar Meena.  
Member-IBBI Representative

  
Shri Anand Raju  
Member

  
CS Deepali Jain  
Disciplinary Officer



CC :-

1. Insolvency and Bankruptcy Board of India
2. Registered Valuer
3. IOV-RVF- Members Record