

Shreenath Investment Company Limited

CIN : L67120MH1979PLC022039

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Date: 29<sup>th</sup> August, 2024

To,  
Corporate Relationship Department  
The Bombay Stock Exchange Limited  
Dalal Street,  
Mumbai – 400 001

**Script Code: 503696**

Dear Sir/Madam,

**Subject: Submission of 44<sup>th</sup> Annual Report for the financial year 2023-24.**

With reference to the above captioned subject, enclosed herewith please find 44<sup>th</sup> Annual Report of Shreenath Investment Company Limited for the financial year 2023-24 for your records as per Regulation 34(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Kindly take the same on record and oblige.

Thanking You

Yours faithfully,

**FOR SHREENATH INVESTMENT COMPANY LIMITED**

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Jatin Jain  
Managing Director  
DIN: 08521872



**SHREENATH INVESTMENT COMPANY  
LIMITED**

**44th ANNUAL REPORT 2023-24**

INVEST TODAY FOR  
BETTER TOMORROW

## **CORPORATE INFORMATION:-**

### **Board of Directors:-**

Mr. Jatin Jain- Managing Director  
Mr. Ashwin Jain- Director  
Ms. Renu Jain- Independent Director  
Mr. Ritesh Chopra- Independent Director  
Mr. Bhaoya Sundesha- Independent Director

### **Bankers:-**

HDFC Bank

### **Chief Financial Officer**

Mr. Mayur Kadakia

### **Company Secretary & Compliance Officer**

Mr. Parth Singhal

### **Statutory Auditors**

Kamdar Dalal & Associates.

### **Internal Auditors**

M/s. ZADN & Associates

### **REGISTERED OFFICE**

801-802, Dalamal Towers,  
Nariman Point, Mumbai-400 021, Maharashtra.  
Website : [www.shreenathinvestment.in](http://www.shreenathinvestment.in)  
Email: [sicl2889@gmail.com](mailto:sicl2889@gmail.com)

### **REGISTRAR & TRANSFER AGENT**

***KFin Technologies Limited***

***Corporate Office Address:“ Selenium, Tower B, Plot No- 31 & 32, Financial District,  
Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032 IN.  
Contact Details: Tel No: +91 40 67161659, Email:umesh.pandey@kfintech.com  
Website: [www.kfintech.com](http://www.kfintech.com)***

## INFORMATION FOR SHAREHOLDERS 44<sup>TH</sup> ANNUAL GENERAL MEETING

**DATE : 26<sup>TH</sup> SEPTEMBER, 2024**

**TIME : 12.00 P.M.**

**VENUE : 801-802, DALAMAL TOWER, NARIMAN POINT, FREE PRESS  
JOURNAL MARG, MUMBAI - 400021.**

**DATE OF BOOK: (both days inclusive)**

**CLOSURE**

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**NOTICE OF ANNUAL GENERAL MEETING**

**NOTICE IS HEREBY GIVEN THAT 44<sup>TH</sup> ANNUAL GENERAL MEETING OF MEMBERS OF M/S. SHREENATH INVESTMENT COMPANY LIMITED WILL BE HELD ON THURSDAY, 26<sup>TH</sup> SEPTEMBER, 2024, AT 12:00 P.M., AT THE REGISTERED OFFICE OF THE COMPANY SITUATED AT 801-802, DALAMAL TOWERS, 8<sup>TH</sup> FLOOR, NARIMAN POINT, MUMBAI 400021 TO TRANSACT THE FOLLOWING BUSINESS:**

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**ORDINARY BUSINESS:**

- 1. To receive, consider and adopt the Audited Profit and Loss Account for the year ended 31<sup>st</sup> March, 2024 and the Balance Sheet as on that date and the reports of the Directors its annexures and Auditors thereon;**
- 2. To appoint a Director in place of Mr. Ashwin Pukhraj Jain (DIN: 00173983), who retires by rotation and being eligible, offers himself for re-appointment.**

**By order of the Board of Directors  
For Shreenath Investment Company Limited**

**Sd/-**

**Jatin Jain  
Managing Director  
DIN:- 08521872**

**Place: Mumbai  
Date: 29-08-2024**

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**Notes:**

1. The Explanatory Statement pursuant to Section 102(1) of the Companies Act, 2013 ('the Act') relating to the Special Business to be transacted at the Annual General Meeting ('AGM'/'Meeting') is annexed hereto. The Board of Directors of the Company has opined that the special business, being considered unavoidable, be transacted at AGM of the Company.
2. Pursuant to the provisions of Regulation 36(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('Listing Regulations') and the Secretarial Standard on General Meetings ('SS-2'), the relevant information in respect of the Directors seeking re-appointment at the AGM is attached as "Annexure I" and forms an integral part of this Notice.
3. In compliance with the applicable MCA Circulars and SEBI Circulars, the Notice of the AGM along with the Annual Report for the Financial Year 2023-24 are being sent only through electronic mode (by e-mail) to those Members whose e-mail addresses are registered with the Company/ Depositories. Members may note that the Notice of the AGM and the Annual Report for the Financial Year 2023-24 will also be available on the Company's website at <http://www.shreenathinvestment.in/>, websites of the Stock Exchanges, i.e. BSE Limited at [www.bseindia.com](http://www.bseindia.com), and on the website of KFintech at <https://evoting.kfintech.com>.
4. A Member entitled to attend and vote at the Annual General Meeting (AGM) is entitled to appoint proxy to attend the meeting and the proxy need not be the member of the Company. The instrument appointing the proxy, in order to be effective, must be deposited at the Company's Registered office, duly completed and signed, not less than FORTY-EIGHT HOURS before the meeting;
5. Proxies submitted on behalf of limited companies, societies, etc., must be supported by appropriate resolutions/ authority, as applicable. A person can act as a proxy on behalf of Members not exceeding fifty (50) and holding in the aggregate not more than 10% of the total share capital of the Company. In case a proxy is proposed to be appointed by a Member holding more than 10% of the total share capital of the Company carrying voting rights, then such proxy shall not act as a proxy for any other person or shareholder;
6. In case of joint holders attending the meeting, the member whose name appears as the first holder in the order of names as per the Register of members of the Company will be

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entitled to vote;

7. The Register of Members and Transfer Books of the Company will be closed from **17<sup>th</sup> September 2024 to 26<sup>th</sup> September 2024** (both days inclusive);
8. Register of Directors and Key Managerial Personnel and their shareholding maintained under Section 170 of the Companies Act, 2013 and the Register of Contracts and Arrangements in which directors are interested maintained under section 189 of the Companies Act, 2013 will be available for inspection by the members at the Annual General Meeting;
9. Members/Proxies should fill the attendance slip for attending the meeting and bring their attendance slip along with their copy of Annual Report to the meeting;
10. Corporate Members intending to send their authorized representatives to attend the meeting are requested to send to the Company a certified copy of the Board resolution authorizing such a representative to attend and vote on their behalf at the meeting;
11. As per the provisions of the Companies act, facility for making nomination is available for shareholders, in respect of the shares held by them. Nomination Forms can be obtained from the Registrar and Share Transfer Agents of the Company;
12. A route map showing direction to reach the venue of AGM is given in the Annual Report as per the requirement of the Secretarial Standards-2 on "General Meeting".
13. Members seeking any information or clarification on the Annual Report are requested to send in written queries to the Company at least one week before the meeting to enable the Company to compile the information and provide replies at the meeting;
14. Member's holding shares in physical form are requested to consider converting their holding to dematerialized form to eliminate all the risk associated with the physical shares and for ease of portfolio management. Members can Contact the Company or M/s. KFin Technologies Limited for assistance in this regards;
15. In terms of circular issued by the Securities and Exchange Board of India (SEBI), it is mandatory to quote Permanent Account Number ("PAN") for participating in the securities market. Therefore, Members holding shares in dematerialized form are requested to submit the PAN details to their Depository Participants, whereas Members holding shares in physical form are requested to submit the PAN details to the Registrar and Transfer Agent of the Company.

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Vide SEBI Notification No. SEBI/LAD-NRO/ GN/2018/24 dated 08th June, 2018 and further amendment through Notification No. SEBI/ LAD-NRO/GN/2018/49 dated 30th November, 2018, any request for effecting transfer of securities (except in case of transmission or transposition of securities) shall not be processed from 01st April, 2019 unless the securities are held in the dematerialized form with the depositories. Therefore, Members are requested to dematerialize the Equity Shares of the Company held by them, promptly.

16. Members holding shares in physical form in identical order of names in more than one folio are requested to send to Company or M/s. KFin Technologies Limited, the details of such folios, together with the Share Certificates for consolidating their holding in one folio. A consolidated share certificate will be returned to such Members after making requisite changes thereon;
17. Members are requested to address all correspondences including dematerialization of shares, to the Registrar and Share Transfer Agents M/s. KFin Technologies Limited, the details of which are as follows;

*Corporate Office Address: Selenium, Tower B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032, Telangana. Contact Details: Tel No: +91 40 67161659*

*Email: umesh.pandey@kfintech.com*

*Email: compliance.corp@kfintech.com*

*Website: www.kfintech.com*

18. All documents referred to in the notice are open for inspection at the registered office of the Company between business hours on all working hours on all working days up to date of the Meeting;
19. In Compliances with the provisions of section 108 of the Companies Act, 2013 and the rules framed there under, the members are provided with the facility to cast their vote electronically, through the e-voting service provided by KFin Technologies Limited, on all the resolutions set forth in the notice;

## **20. E-voting**

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In compliance with the provisions of Section 108 of the Act, read with Rule 20 of the Companies (Management and Administration) Rules, 2014, as amended from time to time, Regulation 44 of the SEBI (LODR) Regulations, 2015 and in terms of SEBI vide circular no. SEBI/HO/CFD/CMD/ CIR/P/2020/242 dated December 09, 2020 in relation to “e-Voting Facility provided by Listed Entities”, the Company is pleased to provide the facility to Members to exercise their right to vote on all the resolutions as set forth in this Notice and proposed to be passed at AGM by electronic means, through the e-Voting services provided by KFin Technologies Limited.

**A) LOGIN METHOD FOR REMOTE E-VOTING FOR INDIVIDUAL SHAREHOLDERS HOLDING SECURITIES IN DEMAT MODE.**

Pursuant to SEBI circular no. SEBI/HO/CFD/ CMD/CIR/P/2020/242 dated December 09, 2020 on “e-Voting facility provided by Listed Companies”, e-Voting process has been enabled to all the individual demat account holders, by way of single login credential, through their demat accounts/websites of Depositories/DPs in order to increase the efficiency of the voting process. Individual demat account holders would be able to cast their vote without having to register again with the E-Voting Service Provider (“ESP”) thereby not only facilitating seamless authentication but also ease and convenience of participating in e-Voting process. Shareholders are advised to update their mobile number and e-mail ID with their DPs to access remote e-Voting facility.

**OPTION 1 - LOGIN THROUGH DEPOSITORIES**

**Members having NSDL as Depository**

1. Members who have already registered and opted for IDeAS facility to follow below steps:

(i) Go to URL: <https://eservices.nsdl.com>

(ii) Click on the “Beneficial Owner” icon under “IDeAS” section.

(iii) On the new page, enter the existing User ID and Password. Post successful authentication, click on

**Members having CDSL as Depository**

1. Members who have already registered and opted for Easi/Easiest to follow below steps:

(i) Go to URL: <https://web.cdslindia.com/myeasi/home/login> ; or

(ii) URL: [www.cdslindia.com](http://www.cdslindia.com) and then go to Login and select New System Myeasi

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“Access to e-Voting”.

(iv) Click on the Company name or e-Voting service provider and you will be re-directed to e-Voting service provider website for casting the vote during the remote e-Voting period.

2. User not registered for IDeAS e-Services

(i) To register click on link:

<https://eservices.nsdl.com> (Select “Register Online for IDeAS”) or <https://eservices.nsdl.com/SecureWeb/Idea sDirectReg.jsp>

(ii) Proceed with completing the required fields.

3. First-time users can visit the e-Voting website directly and follow the process below:

(i) Go to URL:  
<https://www.evoting.nsdl.com/>

(ii) Click on the icon “Login” which is available under “Shareholder/Member” section.

(iii) Enter User ID (i.e. 16-digit demat account number held with NSDL), Password/OTP and a Verification Code as shown on the screen.

(iv) Post successful authentication,

(iii) Login with user id and password.

(iv) The option will be made available to reach e-Voting page without any further authentication.

(v) Click on company name or e-Voting service provider name to cast your vote during the remote e-Voting period.

2. User not registered for Easi/Easiest

(i) Option to register is available at <https://web.cdslindia.com/myeasi/Registration/EasiRegistration>

(ii) Proceed with completing the required fields.

3. First-time users can visit the e-Voting website directly and follow the process below:

(i) Go to URL: [www.cdslindia.com](http://www.cdslindia.com)

(ii) Click on the icon “E-Voting”

(iii) Provide demat Account Number and PAN.

(iv) System will authenticate user by sending OTP on registered Mobile & Email as recorded in the demat Account.

(v) After successful authentication, the

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you will be redirected to NSDL Depository site wherein you can see e-Voting page.

user will be provided links for the respective ESP where the e-Voting is in progress.

(v) Click on the Company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period.

(vi) Click on the Company name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period.

### **OPTION 2 - LOGIN THROUGH DEPOSITORY PARTICIPANTS**

(i) You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility.

(ii) Once logged-in, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature.

(iii) Click on options available against company name or e-Voting service provider-KFin Tech and you will be redirected to e-Voting website of KFin Tech for casting your vote during the remote e-Voting period without any further authentication.

Important note: Members who are unable to retrieve User ID/Password are advised to use Forgot user ID and Forgot Password option available at respective websites.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. NSDL and CDSL.

#### **Login type**

Securities held with NSDL

#### **Helpdesk details**

Please contact NSDL helpdesk by sending a request at [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in) or call at toll free no.: 1-800-1020-990 and 1-800-224-430.

Securities held with CDSL

Please contact CDSL helpdesk by sending a request at [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or contact at 022-23058738 or 022-23058542-43.

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**B. LOGIN METHOD FOR E-VOTING: APPLICABLE FOR SHAREHOLDERS OTHER THAN INDIVIDUAL SHAREHOLDERS HOLDING SECURITIES IN DEMAT MODE AND SHAREHOLDERS HOLDING SECURITIES IN PHYSICAL MODE.**

i) Please access the RTA's e-voting platform at the URL: <https://evoting.kfintech.com/>

ii) Members whose email IDs are registered with the Company/Depository Participants (s), will receive an email from RTA which will include details of E-Voting Event Number (EVEN) i.e. 8323 USER ID and password. Members are requested to use these credentials at the Remote Voting Login at the above-mentioned URL.

(iii) Alternatively, if the member is already registered with RTA's e-voting platform, then he can use their existing User ID and password for casting the vote through remote e-voting. If they have forgot the password, then they may click "forgot password" and enter Folio No. or DP ID Client ID and PAN to generate a password.

(iv) Members can also use SMS service to get the credentials if their mobile number is registered against Folio No./DP ID Client ID, by sending SMS: MYEPWD <space> EVEN No+Folio No. (in case of physical shareholders) or MYEPWD <space> DP ID Client ID (in case of shares held in DEMAT form) to 9212993399.

Example for NSDL	MYEPWD	<SPACE>
	IN12345612345678	
Example for CDSL	MYEPWD	<SPACE>
	1402345612345678	
Example for Physical	MYEPWD <SPACE>	
	Event No. 6857	

Voting Start Date & Time	23 <sup>th</sup> September, 2024: 9 am (I.S.T)
Voting End Date & Time	25 <sup>th</sup> September, 2024: 5 pm (I.S.T)

**21. General Instructions for Members:**

(i) It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.



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(ii) In case of any query and / or grievance, in respect of Voting by electronic means, Members may refer to the Help & Frequently Asked Questions (FAQs) and e-voting User Manual available at the Downloads section at <https://emeetings.kfintech.com> (KFin website) or contact Mr. Umesh Pandey of KFin at Selenium Tower B, Plot 31-32, Gachibowli, Financial District, Nanakramguda, Hyderabad 500032, email at [umesh.pandey@kfintech.com](mailto:umesh.pandey@kfintech.com) or [einward.ris@kfintech.com](mailto:einward.ris@kfintech.com) or call KFin's toll free no. 1800 309 4001 for any further clarifications.

iii) Member can temporarily update their e-mail ID and mobile number with RTA by using the following link - <https://ris.kfintech.com/clientservices/mobilereg/mobileemailreg.aspx>

22. Mr. Pramod S. Shah, Partner of M/s. Pramod S. Shah & Associates, Practicing Company Secretaries (Membership No. FCS 334) has been appointed as the scrutinizer to scrutinize the e-voting process in a fair and transparent manner.

23. The result shall be declared on or after the AGM of the Company. The results declared along with the Scrutinizers report shall be placed on the Company's website [www.shreenathinvestment.in](http://www.shreenathinvestment.in) and on the website of KFin Technologies Limited immediately after the result is declared by the Chairman of the Company.

By order of the Board of Directors  
For Shreenath Investments Company Limited

Sd/-  
Jatin Jain  
Managing Director  
DIN: - 08521872

Place: Mumbai  
Date: 29-08-2024

CIN: L67120MH1979PLC022039

ANNEXURE I

DISCLOSURES REGARDING APPOINTMENT OR RE-APPOINTMENT OF DIRECTORS AS REQUIRED UNDER REGULATION 36 OF SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS & DISCLOSURE REQUIREMENTS) REGULATION, 2015:

**Mr. Ashwin Pukhraj Jain** became the Director of M/s. Shreenath Investment Company Limited and has been participating in making various policies and regulation of M/s. Shreenath Investment Company Limited.

**Mr. Ashwin Pukhraj Jain** plays an important role in guiding the Security Market activities of M/s. Shreenath Investment Company Limited. There is no relationship between **Mr. Ashwin Pukhraj Jain** and any of the Directors of the Company.

Names of Companies in Which the Person Also Holds Directorship And The Membership Of The Committees Of The Board:

Name of the Company	Date of Appointment	Date of Cessation
Real Trustee Advisory Company Private Limited	10/01/2024	-
Parag Plastics Industries Private Limited	30/09/2010	
Asami Farmer Finance Private Limited	09/08/2010	-
Perihelion General Finance Private Limited	03/10/2016	-
Auxilo Finserve Private Limited	24/10/2018	-
Profitex Shares & Securities Private Limited	01/03/2006	-
VA Friendship Solar Park Private Limited	30/09/2010	-

**By order of the Board of Directors  
For Shreenath Investment Company Limited**

Sd/-  
**Jatin Jain**

**Managing Director**  
DIN:- 08521872

**Place: Mumbai**  
**Date: 29-08-2024**

CIN: L67120MH1979PLC022039

**ATTENDANCE SLIP**

<b>Registered Folio / DP ID &amp; Client ID</b>	
<b>Name of Shareholder</b>	
<b>Address of Shareholder</b>	
<b>No. of Shares held</b>	

**I/We hereby record my/our presence at the Annual General Meeting of the Company at 801-802, Dalamal Towers, Nariman Point, Mumbai-400021, on Thursday 26<sup>th</sup> September, 2024 at 12.00 PM.**

**Signature of Shareholder/Proxy of Shareholder: - \_\_\_\_\_**

**Note:**

- 1. You are requested to sign and hand this over at the entrance.**

**If you are attending the meeting in person or by proxy please bring copy of notice and annual report for reference at the meeting**

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**Form No. MGT 11 Proxy form**

*[Pursuant to section 105(6) of the Companies Act, 2013 and rule 19(3) of the Companies (Management and Administration) Rules, 2014]*

**Name of the Company: Shreenath Investment Company Limited**

**CIN: L67120MH1979PLC022039**

**Registered office: 801-802, Dalamal Towers, Nariman Point, Mumbai-400021**

**Name of the Member (s) :**

**Registered address:**

**E-mail Id :**

**Folio No/Client ID:**

**DP ID:**

**I/We being the member (s) of ..... shares of the above named Company, hereby appoint**

<b>Sr. no</b>	<b>Name</b>	<b>Address</b>	<b>E-mail Id</b>	<b>Signature</b>
<b>1</b>				
<b>2</b>				
<b>3</b>				

**as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at Annual General Meeting of the company, to be held on 26<sup>th</sup> September, 2024, at 12.00 p.m. at 801-802, Dalamal Towers, Nairman Point, Mumbai-400 021 and at any adjournment thereof in respect of such resolutions as are indicated below:**

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**Resolutions:**

**ORDINARY BUSINESS:**

1. To receive, consider and adopt the Audited Profit and Loss Account for the year ended 31<sup>st</sup> March, 2024 and the Balance Sheet as on that date and the reports of the Directors its annexure and Auditors thereon;
2. To appoint a Director in place of Mr. Ashwin Pukhraj Jain (DIN: 00173983), who retires by rotation and being eligible, offers himself for re-appointment.

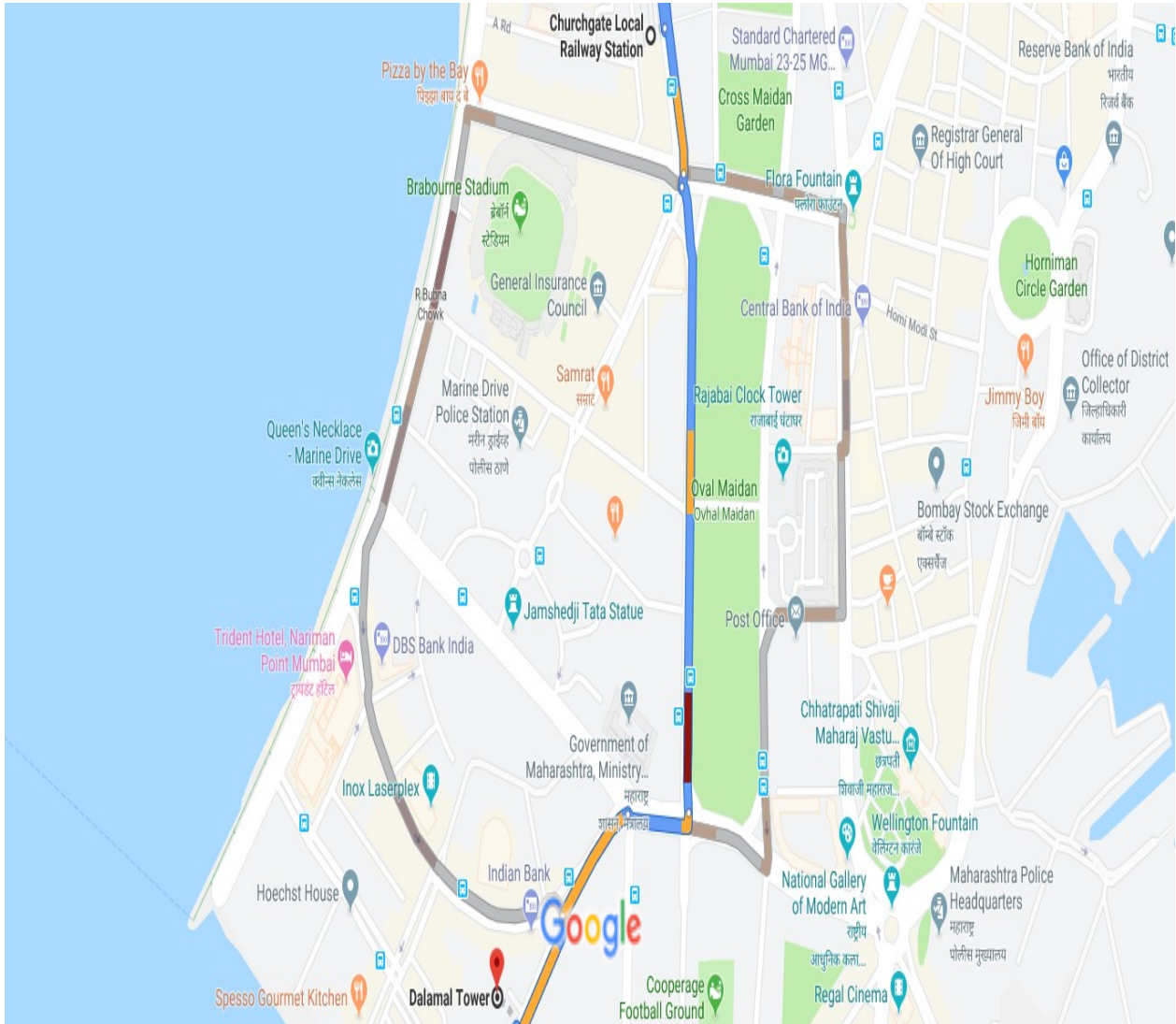
Signed this

Signature of shareholder: \_\_\_\_\_

Signature of Proxy holder(s): \_\_\_\_\_

**Note: This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting**

**ROUTE MAP FOR AGM VENUE**



## Director's Report

To,  
The Members  
Shreenath Investment Company Limited

Your Directors are pleased to present herewith 44<sup>th</sup> Annual Report on the business and operation of the Company together with the Audited Financial Statement of your Company for the Financial Year ended 31<sup>st</sup> March, 2024.

### The State of the Company's Affairs

#### 1. KEY FINANCIAL HIGHLIGHTS:

Particulars	For the Year ended 31 <sup>st</sup> March, 2024 (Rs. In lacs)	For the Year ended 31 <sup>st</sup> March, 2023 (Rs. In lacs)
<b>Income</b>	<b>6,302.54</b>	<b>187.44</b>
Expenditure	5,939.12	28.97
Profit/(Loss) before Depreciation and Tax	363.42	158.47
Depreciation	0.21	0.28
Profit/(Loss) before Tax	363.21	158.19
Deferred Tax/Current Tax	95.32	55.10
<b>Profit/(Loss) after Tax</b>	<b>267.89</b>	<b>103.09</b>

During the year under review your Company has reported a Profit of Rs. 267.89 Lakhs against Net profit of Rs. 103.09 Lakhs in the previous financial year.

#### 2. DIVIDEND:

With a view to plough back the profits of the Company for future growth, your Directors do not recommend dividend for the year ended 31<sup>st</sup> March, 2024.

**3. TRANSFER TO RESERVES:**

Your Company has transferred during the financial year ended 31st March, 2024, amount of Rs. 267,88,539.35/- /- as against Rs. 103,08,874.87 in the financial year ended 31st March, 2023 to the Retained Earnings out of the profit available for appropriation.

**4. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO (SECTION 134 (3) (m) OF THE COMPANIES ACT, 2013:**

With the kind of activities carried out by the Company, it has not spent any substantial amount on conservation of energy and technology absorption stipulated under Section 134(m) of the Companies Act, 2013.

**5. FOREIGN EXCHANGE EARNINGS AND OUTGO:**

The Foreign Exchange earned in terms of actual inflows and the Foreign Exchange Outgo in terms of actual outflows is NIL.

**6. MATERIAL CHANGES AND COMMITMENTS AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAVE OCCURED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT:**

There has been no material changes and commitments affecting the financial position of the company which have occurred between the end of the financial year of the Company to which the financial statements relate and the date of the report.

**7. REVISION OF THE FINANCIAL STATEMENT OF THE COMPANY/THE REPORT OF THE BOARD:**

The Financial Statement of the Company/Board Report has not been revised during the Financial Year 2023-24 as per section 131 of Companies Act, 2013.

**8. ANNUAL - RETURN EXTRACTS:**

Extracts of the Annual Return as provided in Section 92(3) of the Companies Act, 2013, in MGT-9 is attached as "ANNEXURE-I". The web address where annual return has been placed [www.shreenathinvestment.in](http://www.shreenathinvestment.in).



**9. DETAILS OF NEW SUBSIDIARY/ JOINT VENTURES / ASSOCIATE COMPANIES:**

Sr. No.	Name of the Company	Subsidiary / Joint Ventures / Associate Company	Date of becoming of Subsidiary / Joint Ventures / Associate Company
N.A.	N.A.	N.A.	N.A.

**10. DETAILS OF THE COMPANY WHICH CEASED TO BE ITS SUBSIDIARY/ JOINT VENTURES/ ASSOCIATE COMPANIES:**

Sr. No.	Name of the Company	Subsidiary / Joint Ventures / Associate Company	Date of cessation of Subsidiary / Joint Ventures / Associate Companies
N.A.	N.A.	N.A.	N.A.

**11. THE DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATIONS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE:**

Sr. No.	Name of the Authority who has issued an order.	Date of Order.	Particulars of order.
N.A.	N.A.	N.A.	N.A.

**12. DEPOSITS:**

During the year, the Company has not accepted any deposits covered under section 73 to 76 under the Companies Act, 2013.

**13. INTERNAL FINANCIAL CONTROL:**

The Board of Directors is responsible for ensuring that internal financial controls have been laid down in the Company and that such controls are adequate and is functioning effectively. Shreenath Investment Company has policies, procedures, control frameworks and

management systems in place that map into the definition of Internal Financial Controls. These have been established at the entity and process levels and are designed to ensure compliance internal control requirements, regulatory compliance and appropriate recording of financial and operational information. The company has adequate internal control system in place on the basis of which financial accounting is done and periodically financial statements are prepared. Such internal control systems are adequate operating effectively.

**14. BOARD MEETINGS:**

The Board met 12 times during the year. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013. The details of which are given below:

<b>Sr. No.</b>	<b>Date of Meetings</b>	<b>Directors Present</b>	<b>Venue</b>	<b>Leave of Absence</b>
01	12.04.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mr. Mukul Goyal Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
02	30.05.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mr. Mukul Goyal Mrs. Renu Jain Mr. Ritesh Chopra	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
03	12.07.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mr. Mukul Goyal Mrs. Renu Jain Mr. Ritesh Chopra	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
04	03.08.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
05	10.08.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA

## Shreenath Investment Company Limited Annual Report 2023-24

06	25.08.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
07	31.08.2023	Mr. Vikas Mapara Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
08	26.10.2023	Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Leave of absence granted
09	01.11.2023	Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Leave of absence granted
10	22.12.2023	Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Leave of absence granted
11	06.02.2024	Mr. Vikas Mapara Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA
12	27.03.2024	Mr. Ashwin Jain Mrs. Renu Jain Mr. Ritesh Chopra Mr. Bhavya Sundesha Mr Jatin Jain	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	NA

## **15. CHANGE IN DIRECTORS AND KEY MANAGERIAL PERSONNEL:**

In accordance with Section 152(6) of the Companies Act, 2013 and Articles of Association of the Company, Mr. Ashwin Pukhraj Jain (DIN: 00173983), Director of the Company retires by rotation at the ensuing Annual General Meeting, being eligible offers himself for re-appointment.

During the year, Mr. Vikas Mapara (Managing Director) resigned from the Directorship of the Company w.e.f. 27<sup>th</sup> March, 2024.

During the year, Mr. Jatin Jain was appointed as Additional Managing Director in the Company w.e.f. 27<sup>th</sup> March, 2024 and his appointment was regularised in the Extra Ordinary General Meeting held on 15<sup>th</sup> July, 2024.

## **16. STATEMENT ON DECLARATION GIVEN BY THE INDEPENDENT DIRECTORS UNDER SECTION 149 (6) OF THE COMPANIES ACT, 2013:**

The Company has received the necessary declaration from each Independent Directors in accordance with Section 149(7) of the Companies Act, 2013, that he/she meets the criteria of independence as laid out in sub-section (6) of Section 149 of the Companies Act, 2013. In view of the above provisions, your Company has following Independent Directors:

<b>Sr. No.</b>	<b>Name of the Independent Director</b>	<b>Date of appointment / Reappointment</b>	<b>Date of passing of special resolution/Ordinary resolution (if any)</b>
1.	Renu Jain	31/08/2023	30/09/2023
2.	Ritesh Chopra	31/08/2023	30/09/2023
3.	Bhavya Dilip Sundesha	18/08/2022	22/09/2022

## **17. CHANGE IN THE NATURE OF BUSINESS**

There is no change in the nature of Business by the Company during the period under review.

## **18. NOMINATION AND REMUNERATION COMMITTEE:**

### **Composition:**

The "Nomination and Remuneration Committee" consists of three Directors with the Chairman being the Independent Director. The committee acts in accordance with the

terms of reference as approved and adopted by the Board in its Nomination and Remuneration Policy.

**The Composition of the Committee is as under:**

**Chairman:** Mr. Bhavya Sundesha- Independent Director

**Members:** Ms. Renu Jain – Independent Director

Mr. Ritesh Chopra- Independent Director

**Meeting and attendance**

The nomination and remuneration committee met twice in a year ended on 31<sup>st</sup> March 2024. The necessary Quorum was present for the meeting.

<b>Sr. No.</b>	<b>Date and time of Meetings</b>	<b>Venue</b>	<b>Committee Members Attendance/ Present</b>	<b>Leave of Absence</b>
1.	30-08-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Ms. Renu Jain Mr. Ritesh Chopra	NA
2.	31-08-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Ms. Renu Jain Mr. Ritesh Chopra	NA

**Nomination and Remuneration Policy**

The Nomination and Remuneration Policy for Director’s, Key Managerial Personnel and other employees are annexed as “**ANNEXURE II**” to the Directors Report. Further; the Company has devised a policy for performance evaluation of Independent Directors, Board, Committees and other individual Directors. The Company’s Nomination and Remuneration Policy is directed towards rewarding performance based on review of achievements periodically. The Nomination and Remuneration Policy is in consonance with the existing industry practice.

**19. AUDIT COMMITTEE:**

In accordance with the provisions of section 177 of the Companies Act, 2013 your Company has constituted an “Audit Committee” comprising of minimum three directors consisting of two Non-Executive Independent Directors and one Executive Director with

the Chairman being the Independent Director. The Audit Committee acts in accordance with the Terms of Reference specified by the Board in writing.

**The Composition of the Committee is as under:**

**Chairman:** Mr. Bhavya Sundesha- Non- Executive Independent Directors

**Members:** Mr Ritesh Chopra-Non- Executive Independent Directors

\*Mr. Jatin Jain - Executive Director

There was reconstitution in the Audit Committee as Mr Vikas Mapara resigned w.e.f. 27th March,2024 and Mr Jatin Jain was appointed w.e.f 27th March 2024

**Meeting and Attendance:**

The Audit Committee met Six times in a year for the year ended 31<sup>st</sup> March 2024.

The necessary quorum was present at the meeting.

Sr. No.	Date and Time of Meetings	Venue	Committee Members Attendance/ Present	Leave of Absence
1.	12-04-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr.Bhavya Sundesha Mr Ritesh Chopra Mr. Vikas Mapara	NA
2.	30-05-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr.Bhavya Sundesha Mr Ritesh Chopra	Leave of Absence Granted
3.	30-08-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr.Bhavya Sundesha Mr. Ritesh Chopra Mr. Vikas Mapara	NA
4.	31-08-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Mr Ritesh Chopra Mr. Vikas Mapara	NA
5	26-10-2023	801-802, Dalamal Tower, Nariman Point, Mumbai	Mr. Bhavya Sundesha	Leave of Absence Granted

		400 021	Mr Ritesh Chopra	
6	06-02-2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Mr Ritesh Chopra Mr. Vikas Mapara	

**The Terms of Reference of the Audit Committee are broadly stated as under:**

- (a) Recommendation for appointment, remuneration and terms of appointment of auditors of Company;
- (b) Overview of the company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible;
- (c) Review and control of internal financial controls and risk management systems;
- (d) Review of financial statements before submission to Board;
- (e) Supervision of other financial and accounting matters as may referred to by the Board;
- (f) Discussion with statutory auditors before audit commences, about the nature and scope of audit as well as post-audit discussion to assert any area of concern;
- (g) Scrutiny of inter-corporate loans and investments;
- (h) Monitoring the end use of funds raised through public offers and related matters;
- (i) Valuation of undertakings or assets of the company, wherever it is necessary;
- (j) Approval of appointment of chief financial officer after assessing the qualifications, experience and background etc, of the candidate;

**20. STAKEHOLDER RELATIONSHIP COMMITTEE:**

The Committee has the mandate to review, redress shareholders grievances and to approve all the share transfers.

**The Composition of the Committee is as under:**

**Chairman:** Mr. Bhavya Sundesha- Non- Executive Independent Directors

**Members:** Mr Ashwin Jain-Executive Directors

\*Mr. Jatin Jain- Executive Director

There was reconstitution in the stakeholder Relationship Committee as Mr Vikas Mapara resigned w.e.f. 27th March,2024 and Mr Jatin Jain was appointed w.e.f 27th March 2024.

The function of Stakeholder Relationship Committee includes the following:

- Transfer /Transmission of shares;
- Issue of duplicate share certificates;
- Review of shares dematerialized and all other related matters;
- Monitors expeditious redressal of investors' grievances;
- Non receipt of Annual Report and declared dividend; All other matters related to shares.

The Meeting of Stakeholders Relationship Committee met twice in a year for the year ended 31<sup>st</sup> March 2024.

<b>Sr. No.</b>	<b>Date and time of Meetings</b>	<b>Venue</b>	<b>Committee Members Attendance/ Present</b>	<b>Leave of Absence</b>
1.	30.08.2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Mr. Ashwin Jain Mr. Vikas Mapara	NA
2.	31.08.2023	801-802, Dalamal Tower, Nariman Point, Mumbai 400 021	Mr. Bhavya Sundesha Mr. Ashwin Jain Mr. Vikas Mapara	NA

## **21. CSR COMMITTEE:**

Your Company constituted CSR Committee pursuant to Section 135 of the Companies Act, 2013 read with rule thereunder.

The Meeting of CSR Committee was held on dated 30<sup>th</sup> May 2023.

### **The composition of the CSR committee:**

1. Mr. Bhavya Sundesha- Chairperson- Non-Executive Independent Director
2. \*Mr. Jatin Jain- Member-Executive Director
3. Ms. Renu Jain- Member-Non-Executive Independent Director



\*There was reconstitution in the CSR Committee as Mr Vikas Mapara resigned w.e.f. 27<sup>th</sup> March,2024 and Mr Jatin Jain was appointed w.e.f 27<sup>th</sup> March 2024.

The Corporate Social Responsibility Committee formulate and recommend to the Board a CSR Policy which shall indicate the activities to be undertaken by company as specified in Schedule VII of the Companies Act, 2013 and amount of expenditure to be incurred on the activities suggested as per CSR Policy.

According to Rule 3(2) of The Companies (Corporate Social Responsibility Policy) Rules, 2014:

Every company which ceases to be a company covered under subsection (1) of section 135 of the Act for three consecutive financial years shall not be required to –

(a) constitute a CSR Committee; and

(b) comply with the provisions contained in sub-section (2) to (5) of the said section, till such time it meets the criteria specified in sub-section (1) of section 135.

Thus keeping in view, the above provisions and non-fulfilment of criteria under section 135 of the Act for three consecutive financial years, the Company was not required to spend any amount for CSR in the financial year 2023-24.

The Annual Report on CSR Activity is annexed as Annexure- VIII

### **22. VIGIL MECHANISM:**

Pursuant to Section 177(9) of the Companies Act, 2013, the company has established a 'Whistle Blower Policy and Vigil Mechanism' is annexed as "**Annexure III**" to the Director's Report, for directors and employees to report their genuine concerns to the company. The company oversees this 'Vigil Mechanism' through the Audit Committee of the Board.

### **23. QUALIFICATION GIVEN BY THE AUDITORS:**

There are no qualifications, reservation or adverse remarks or disclaimers made by the Statutory Auditors of the Company in their Report.

### **24. SECRETARIAL AUDIT:**

Pursuant to the provisions of Section 204 of the Companies Act, 2013, and the rules made thereunder, the company has appointed M/s. Pramod S Shah & Associates, a firm of Company Secretaries in Practice (C.P.No.3804) to undertake Secretarial audit of the

Company. The Secretarial Audit Report is included as “ANNEXURE IV” And it forms an integral part of this report.

**25. COST AUDIT:**

The maintenance of cost records as specified by the Central Government under sub-section (1) of section 148 of the Companies Act, 2013, is not applicable to the Company.

**26. LOANS, GUARANTEES OR INVESTMENTS BY THE COMPANY:**

Particulars of loans given, investments made or guarantees or securities provided pursuant to Section 186 of the Act are given under Notes to Accounts annexed to the Standalone Financial Statements for the financial year ended March 31, 2024 and the same forms part of the Annual Report.

**27. CONTRACT OR ARRANGEMENT WITH RELATED PARTIES:**

The company has entered into transactions with the related party and the particulars of contracts and arrangements with related parties referred to in Section 188(1), as prescribed in Form AOC – 2 of the rules prescribed under Chapter IX relating to Accounts of Companies under the Companies act, 2013, is appended as **ANNEXURE – V**.

**28. PERFORMANCE EVALUATION:**

The company has in its place a policy on performance evaluation of independent directors, board, committees and individual directors. The Board of Directors evaluates its own performance in terms of operations of the company, financial results etc. The performance of committee(s) is evaluated by the board based on the effectiveness of individual director(s) based on the contribution of individual director to be the board/ committee meetings, participation in discussions, inputs given in the meeting.

As required under the section 178(2) of the Companies Act, 2013 and under Schedule IV to the Companies Act, 2013 on Code of Conduct for Independent Directors, a comprehensive exercise for the evaluation of the performances of every individual director, of the Board as a whole and its Committees and the Chairperson of the Company has been carried by your company during the year under the review as per the evaluation criteria approved by the Board and based on the Guidelines given in Schedule IV to the Companies Act, 2013.

For the purpose of carrying out performance evaluation exercise, four types of Evaluation forms were devised in which the evaluating authority has allotted to the individual directors, the Board as a whole, its Committees and the Chairperson appropriate grading from 1 to 5 and in which rating 1 would be considered a highest rating depending upon the performance.

Such evaluation exercise has been carried out:

- (i) of Independent Directors by the Board;
- (ii) of Non-Independent Directors by all Independent Directors in separate meeting held for the purpose on 06<sup>th</sup> February 2024.
- (iii) of the Board as a whole and its committees by all the Independent Directors in separate meeting held for the purpose on 06<sup>th</sup> February 2024.
- (iv) of the Chairperson of the Company by the independent Directors in separate meeting held on 06<sup>th</sup> February 2024 after taking into account the views of the Executive/ Non-Executive Directors;
- (v) of individual directors by Nomination and Remuneration Committee;
- (vi) of the Board itself;

Having regard to the industry, size and nature of business your company is engaged in, the evaluation methodology adopted is, in the opinion of the Board, sufficient, appropriate and is found to be serving the purpose.

**29. AUDITORS:**

M/s. Kamdar Dalal & Associates, Firm Registration No (129596W) Chartered Accountants, Statutory Auditors of the Company were re-appointed on September 22, 2022, for a period of 5 Years. The board has recommended the continuation of the existing auditors.

**30. DISCLOSURE AS PER RULE 5 OF THE COMPANIES (APPOINTMENT AND REMUNERATION OF MANAGERIAL PERSONNEL) RULES, 2014:**

Disclosures with respect to the remuneration of Directors, KMP and employees as required under Section 197(12) of the Companies Act, 2013, read with rule (5)(1) of Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 are given in **ANNEXURE-VI**.

**31. PARTICULARS OF EMPLOYEES:**

There are no employees pursuant to Rule 5(2) of Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and the same is not applicable to the Company during the year 2023-2024.

## **32. LISTING ON STOCK EXCHANGES:**

Your company's equity shares are listed on Bombay Stock Exchange Limited, Mumbai (BSE LTD). The company has paid the listing fees to the stock exchanges for the financial year 2023-24.

## **33. MANAGEMENT DISCUSSION ANALYSIS REPORT:**

The Management Discussion and Analysis report are provided under **ANNEXURE --VII**.

## **34. CORPORATE GOVERNANCE REPORT:**

Your Company aims and constantly strives in maintaining the highest standards of Corporate Governance practices. Your Company complies with all the mandatory requirements as stipulated under the Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. Report on Corporate Governance along with the Certificate from Auditor on compliance of conditions of Corporate Governance and the Certificate from Practicing Company Secretary on Non-disqualification of Directors, forms part of this report and is attached as **ANNEXURE - IX**. A declaration signed by the Chairman and Managing Director in regards to compliance with the Code of Conduct by the Board members and Senior Management Personnel also forms part of this Report.

## **35. RISK MANAGEMENT:**

Your Directors have enlarged mandate of Audit Committee to include responsibility to assist the Board in

- a) Overseeing and approving the Company's enterprise-wide risk management framework; and
- b) Periodic appraisal to assess any change needed in the context of changing business environment.

## **36. DIRECTOR'S RESPONSIBILITY STATEMENT:**

Pursuant to sub-section (5) of Section 134 of Companies Act, 2013 and to the best of their knowledge and belief and according to the information and explanations obtained/received from the operating management, your Directors make the following statement and confirm that: -

- (a) In the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- (b) The directors had selected such accounting policies and applied them consistently and made judgements and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of profit of the company for the period;
- (c) The directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
- (d) The directors had prepared the annual accounts on a going concern basis;
- (e) The directors had laid down internal financial controls to be followed by the company and such internal financial controls are adequate and operating effectively;
- (f) The directors had devised proper systems to ensure compliance with the provisions of all applicable laws and with laid down internal financial controls to be followed by the company and those systems were adequate and operating effectively.

**37. DETAILS IN RESPECT OF FRAUDS REPORTED BY THE AUDITORS UNDER SECTION 143 (12) OF COMPANIES ACT, 2013:**

There are no frauds reported by the Auditor which are required to be disclosed under Section 143 (12) of Companies Act, 2013.

**38. SEXUAL HARASSMENT:**

Your Company has always believed in providing a safe and harassment free workplace for every individual through various interventions and practices. The Company always endeavours to create and provide an environment that is free from discrimination and harassment including sexual harassment. During the year ended March 31, 2024, no complaints have been received pertaining to sexual harassment.

**39. STATEMENT REGARDING OPINION OF THE BOARD WITH REGARD TO INTEGRITY, EXPERTISE AND EXPERIENCE (INCLUDING THE PROFICIENCY) OF THE INDEPENDENT DIRECTORS APPOINTED DURING THE YEAR.**

The Board on the opinion that all the independent directors possess integrity, expertise and experience as required in the Companies Act, 2013 and also has required skill set for efficient functioning of the company.

**40. DETAILS OF INSOLVENCY AND BANKRUPTCY CODE:**

During the year under review, no fresh application has been made neither is any application pending under the Insolvency and Bankruptcy Code.

**41. DETAILS REGARDING VALUATION REPORT:**

During the year under review, your Company has not entered into any One-Time Settlement with Bank's or Financial Institutions and therefore, no details of Valuation in this regard is available.

**42. ACKNOWLEDGEMENT:**

Your directors place on record their sincere gratitude for the assistance, guidance and co-operation of the Company has received from all stakeholders. The Board further places on record its appreciation for the dedicated services rendered by the employees of the Company.

**For and on Behalf of the Board  
Shreenath Investment Company Limited**

**Sd/-  
Jatin Jain-  
Managing Director  
DIN: 08521872**

**Sd/-  
Ashwin Jain-  
Director  
DIN: 00173983**

**Date: 29.08.2024  
Place: Mumbai**

**ANNEXURE I TO THE DIRECTORS' REPORT**

**FORM MGT 9**

**EXTRACT OF ANNUAL RETURN AS AT MARCH 31, 2024**

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the Companies (Management and Administration) Rules, 2014]

**I. REGISTRATION AND OTHER DETAILS**

i)	CIN	L67120MH1979PLC022039
ii)	Registration Date	26/12/1979
iii)	Name of the Company	Shreenath Investment Company Limited
iv)	Category / Sub-Category of the Company	Company Limited by Shares
v)	Address of the Registered office and contact details	801-802 Dalamal Tower, Nariman Point, Mumbai-400021. Tel : 022-6638-1800 Fax : 022-6638-1818
vi)	Whether listed Company	Yes
vii)	Name, Address and Contact details of Registrar and Transfer Agent, if any	KFin Technologies Limited  Selenium, Tower B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032 IN Contact Details: Tel No: +91 40 67161659, Email:umesh.pandey@kfintech.com Website: <a href="http://www.kfintech.com">www.kfintech.com</a>

**II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY**

All the business activities contributing 10 % or more of the total turnover of the Company:

Sr. No.	Name and Description of main product / service	NIC Code of the product / service	% to total turnover of the Company
1	Other financial service activities, except insurance and pension funding activities, n.e.c.	64490	100

### III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

Sr. No.	Name and Address of the Company	CIN	Holding/ Subsidiary	% of Shares held	Applicable Section
01	N.A.	N.A.	N.A.	N.A.	N.A.

### IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity)

#### i) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the beginning of the year(1 <sup>st</sup> April, 2023)				No. of Shares held at the end of the year(31 <sup>st</sup> March, 2024)				% Change during the year
	Demat	Physical	Total	% of total shares	Demat	Physical	Total	% of total shares	
<b>A. Promoters</b>									
<b>(1) Indian</b>									
a) Individual/HUF	136550	0	136550	54.62%	136550	0	136550	54.62%	0
b) Central Govt	0	0	0	0	0	0	0	0	0
c) State Govt (s)	0	0	0	0	0	0	0	0	0
d) Bodies Corp.	35500	0	35500	14.2%	35500	0	35500	14.2%	0
e) Banks / FI	0	0	0	0	0	0	0	0	0
f) Any Other....	0	0	0	0	0	0	0	0	0
<b>Sub-total (A) (1):-</b>	<b>172050</b>	<b>0</b>	<b>172050</b>	<b>68.82%</b>	<b>172050</b>	<b>0</b>	<b>172050</b>	<b>68.82%</b>	<b>0</b>
<b>(2) Foreign</b>									
a) NRIs - Individuals	0	0	0	0	0	0	0	0	0
b) Other - Individuals	0	0	0	0	0	0	0	0	0
c) Bodies Corp.	0	0	0	0	0	0	0	0	0
d) Banks / FI	0	0	0	0	0	0	0	0	0
a) Any Other....	0	0	0	0	0	0	0	0	0
<b>Sub-total (A) (2):-</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total shareholding of Promoter (A) = (A)(1)+(A)(2)</b>	<b>172050</b>	<b>0</b>	<b>172050</b>	<b>68.82%</b>	<b>172050</b>	<b>0</b>	<b>172050</b>	<b>68.82%</b>	<b>0</b>

#### B. Public Shareholding

##### 1. Institutions

a) Mutual Funds	0	0	0	0	0	0	0	0	0
b) Banks / FI	0	0	0	0	0	0	0	0	0
c) Central Govt	0	0	0	0	0	0	0	0	0
d) State Govt(s)	0	0	0	0	0	0	0	0	0
e) Venture Capital Funds	0	0	0	0	0	0	0	0	0
f) Insurance Companies	0	0	0	0	0	0	0	0	0



g) FIIs	0	0	0	0	0	0	0	0	0
h) Foreign Venture Capital Funds	0	0	0	0	0	0	0	0	0
i) Others (specify)	0	0	0	0	0	0	0	0	0
<b>Sub-total (B)(1):-</b>	0	0	0	0	0	0	0	0	0
<b>2. Non-Institutions</b>									
a) Bodies Corp	0	-	-	-	-	-	-	0	0
i) Indian	34150	-	34150	13.66%	34150	-	34150	13.66%	0
ii) Overseas	0	0	0	0	0	0	0	0	0
b) Individuals	0	-	-	-	-	-	-	-	0
i) Individual shareholders holding nominal share capital upto Rs. 2 lakh	21200	22600	43800	17.52%	21200	22600	43800	17.52%	0
ii) Individual shareholders holding nominal share capital in excess of Rs2 lakh	0	0	0	0	0	0	0	0	0

c) Others (specify)	0	0	0	0	0	0	0	0	0
<b>Sub-total (B)(2):-</b>	55350	22600	77950	31.18%	55350	22600	77950	31.18%	0
Total Public Shareholding (B)=(B)(1)+ (B)(2)	55350	22600	77950	31.18%	55350	22600	77950	31.18%	0
C. Shares held by Custodian for GDRs& ADRs	0	0	0	0	0	0	0	0	0
<b>Grand Total (A+B+C)</b>	227400	22600	250000	100%	227400	22600	250000	100%	0

**(ii) Shareholding of Promoters**

Sr. No	Shareholders Name	Shareholding at the beginning of the year(1 <sup>st</sup> April,2023)			Shareholding at the end of the year(31 <sup>st</sup> March,2024)			% change in share holding during the year
		No of Shares	% of total shares of Company	%of Shares Pledged / Encumbered to total shares	No of Shares	% of total shares of Company	%of Shares Pledged / Encumbered	
01	Mangal Bhanshali	30,700	12.28	-	30,700	12.28	0	0
02	Akash Bhanshali	12,175	4.87	-	12,175	4.87	0	0
03	Lata Bhanshali	12,050	4.82	-	12,050	4.82	0	0
04	Meenu Bhanshali	11,950	4.78	-	11,950	4.78	0	0
05	Suraj Bhanshali	11,500	4.60	-	11,500	4.60	0	0
06	Abha Shah	5,000	2.00	-	5,000	2.00	0	0
07	Shah Rekha Nemish	12,000	4.80	-	12,000	4.80	0	0
08	Kavita Shah	10,725	4.29	-	10,725	4.29	0	0
09	Ketan Shah	10,600	4.24	-	10,600	4.24	0	0
10	Krutarth Shah	10,100	4.04	-	10,100	4.04	0	0
11	Shantilal Shah HUF	9,750	3.90	-	9,750	3.90	0	0
12	Advanced Compuflow Pvt Ltd	12,000	4.80	-	0	0	0	-(4.80)
13	Blue Daimond Properties Pvt Ltd (Talma Chemical Ind pvt ltd merged into Blue Diamond Properties Pvt Ltd)	11,500	4.60	-	11,500	4.60	0	0
14	Shamyak Investment Pvt ltd (Change in name in Amrit Petroleum Pvt Ltd)	12,000	4.80	-	24,000	9.60	0	4.80

**(III) CHANGE IN PROMOTERS' SHAREHOLDING:-**

	At the beginning of the year	Shareholding at the beginning of the year(1 <sup>st</sup> April,2023)		Cumulative Shareholding during the year	
		No. of shares	% of total shares of the Company	No. of shares	% of total shares of the Company
01	Mangal Bhanshali	30700	12.28	30700	12.28
02	Akash Bhanshali	12,175	4.87	42,875	17.15
03	Lata Bhanshali	12,050	4.82	54,925	21.97
04	Meenu Bhanshali	11,950	4.78	66,875	26.75
05	Suraj Bhanshali	11,500	4.60	78,375	31.35
06	Abha Shah	5,000	2.00	83,375	33.35
07	Rekha Shah	12,000	4.80	95,375	38.15
08	Kavita Shah	10,725	4.29	106,100	42.44
09	Ketan Shah	10,600	4.24	116700	46.48
10	Krutarth Shah	10,100	4.04	126800	50.72
11	Shantilal Shah HUF	9,750	3.90	136550	54.62
13	Blue Daimond Properties Pvt Ltd	11,500	4.60	1148050	59.22
14	Shamyak Investment Pvt ltd	24,000	9.60	172050	68.82
	<b>Date wise Increase /Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease e.g. allotment / transfer / bonus/ sweat equity etc)*</b>	-			
	<b>At the end of the year(31<sup>st</sup> March,2024)</b>				
01	MangalBhanshali	30,700	12.28	30,700	12.28
02	AkashBhanshali	12,175	4.87	42875	17.15
03	LataBhanshali	12,050	4.82	54925	21.97
04	MeenuBhanshali	11,950	4.78	66875	26.75
05	SurajBhanshali	11,500	4.60	78375	31.35
06	AbhaShah	5,000	2.00	83375	33.35
07	Rekha Shah	12,000	4.80	95375	38.15
08	Kavita Shah	10,725	4.29	106100	42.44
09	Ketan Shah	10,600	4.24	116700	46.48
10	Krutarth Shah	10,100	4.04	126800	50.72
11	Shantilal Shah HUF	9,750	3.90	136550	54.62
12	Advance Compuflow Pvt Ltd	0	0%	136550	54.62
13	Blue Daimond Properties Pvt Ltd	11,500	4.60	160050	64.02
14	Shamyak Investment Pvt ltd	12,000	4.80	172050	68.82

\*During the year there was transfer of shares on 09<sup>th</sup> February,2024 from Advance Compuflow Pvt Ltd to of 12000 shares to Shamyak Investment Pvt. Ltd.

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

Sr. No	At the beginning of the year	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
01	Impact Growth Pvt Ltd	12100	4.84	12100	4.84
02	Gagandeep Credit Capital Pvt Ltd	11900	4.76	24000	9.60
03	Optimum Stock Trading Pvt Ltd	11750	4.70	35750	14.30
04	Optimum Securities Pvt Ltd	10500	4.20	46250	18.5
05	Durgesh Sumatilal Shah	4000	1.6	50250	20.1
06	Dushyant Natwarlal Dalal	5700	2.28	55950	22.38
07	Nimesh Sumatilal Shah	2000	0.8	57950	23.18
08	Urmila D Shah	2000	0.8	59950	23.98
09	Mahendra Kumar Balai	1500	0.6	61450	24.58
10	MohalNihalchand	1500	0.6	62950	25.18
11	Puloma Dushyant Dalal	1500	0.6	64450	25.78
12	Roopa Balai	1500	0.6	65950	26.38
13	Shanti Mohanlal	1500	0.6	67450	26.98
	Date wise Increase /Decrease in Shareholding during the year specifying the reasons for increase /decrease e.g. allotment / transfer / bonus/ sweat equity etc):	No changes during the year			
	At the end of the year				
01	Impact Growth Pvt Ltd	12100	4.84	12100	4.84
02	Gagandeep Credit Capital Pvt Ltd (Change in Name of Trupti Petroleum)	11900	4.76	24000	9.60
03	Optimum Stock Trading Pvt Ltd	11750	4.70	35750	14.30
04	Optimum Securities Pvt Ltd	10500	4.20	46250	18.5
05	Durgesh Sumatilal Shah	4000	1.6	50250	20.1
06	Dushyant Natwarlal Dalal	5700	2.28	55950	22.38
07	Nimesh Sumatilal Shah	2000	0.8	57950	23.18
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10	MohalNihalchand	1500	0.6	62950	25.18
11	Puloma Dushyant Dalal	1500	0.6	64450	25.78
12	Roopa Balai	1500	0.6	65950	26.38
13	Shanti Mohanlal	1500	0.6	67450	26.98

**(v) Shareholding of Directors and Key Managerial Personnel:**

Sr. No.	Name of the Director	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
01	Vikas Mapara				
	At the beginning of the year	1200	0.48%	1200	0.48%
	Date wise Increase /Decrease in Shareholding during the year specifying the reasons for increase /decrease e.g. allotment / transfer / bonus/ sweat equity etc):	No changes during the year			
	At the end of the year	1200	0.48%	1200	0.48%

## V. INDEBTEDNESS

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

	Secured Loans Excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
<b>Indebtedness at the beginning of the financial year</b>				
i) Principal Amount	NIL	NIL	NIL	NIL
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
<b>Total (i+ii+iii)</b>	NIL	NIL	NIL	NIL
<b>Change in Indebtedness during the financial year</b>				
Addition	NIL	NIL	NIL	NIL
Reduction	NIL	NIL	NIL	NIL
<b>Net Change</b>				
<b>Indebtedness at the end of the financial year</b>				
i) Principal Amount	NIL	NIL	NIL	NIL
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
<b>Total (i+ii+iii)</b>	NIL	NIL	NIL	NIL

## VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL:

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:						
Sr. No.	Particulars of Remuneration	Jatin Jain*				Total Amount
	Gross salary					
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	73,925	NIL	NIL	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	NIL	NIL	NIL	NIL	NIL
	Stock Option	NIL	NIL	NIL	NIL	NIL
	Sweat Equity	NIL	NIL	NIL	NIL	NIL
	Commission	NIL	NIL	NIL	NIL	NIL
	- as % of profit	NIL	NIL	NIL	NIL	NIL
	- others, specify...	NIL	NIL	NIL	NIL	NIL
	Others, please specify	NIL	NIL	NIL	NIL	NIL
	<b>Total (A)</b>	<b>73,925</b>				
	Ceiling as per the Act	<b>1,20,00,000/-</b>	NIL	NIL	NIL	NIL

\*Mr. Jatin Jain was appointed as Managing Director as on 27-03-2024

## B. REMUNERATION TO OTHER DIRECTORS:

Sr. No.	Particulars of Remuneration	Name of Directors		Total Amount
	1. Independent Director * Fees for attending board / committee Meeting * Commission(s) * Others, please specify	N.A.	N.A.	N.A.
	<b>Total (1)</b>	NIL	NIL	NIL
	2. Other Non-Executive Directors * Fees for attending board / committee Meeting * Commission(s) * Others, please specify	N.A.	N.A.	N.A.
	<b>Total (2)</b>	NIL	NIL	NIL
	Total (B)=(1+2)	NIL	NIL	NIL
	Total Managerial Remuneration	NIL	NIL	NIL
	Overall Ceiling as per the Act	N.A.	N.A.	N.A.

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

Sr. No.	Particulars of Remuneration	Key Managerial Personnel			
		CEO	Company Secretary Mrs. Priya Dhanuka	CFO	Total
1	Gross salary a) Salary as per the provisions contained in sections 17(1) of the Income Tax act, 1961; b) Value of perquisites u/s17(2) Income-tax Act, 1961; c) Profits in lieu of salary under section 17(3) Income-Tax Act, 1961.	-	3,00,000	94,086	3,94,086
2	Stock Option	-	-	-	-
3	Sweat Equity	-	-	-	-
4	Commission - as % of profit - Others, specify...	-	-	-	-
5	Others, please specify	-	-	-	-
	<b>Total</b>	-	3,00,000	94,086	3,94,086

**VII. PENALTIES/ PUNISHMENT/ COMPOUNDING OF OFFENCES:**

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)
<b>A. COMPANY</b>					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
<b>B. DIRECTORS</b>					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
<b>C. OTHER OFFICERS IN DEFAULT</b>					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.

**For and on behalf of the Board**

**Sd/-  
Jatin Ramanlal Jain  
Managing Director  
DIN: 08521872**

**Sd/-  
Ashwin Pukhraj Jain  
Director  
DIN: 00173983**

**Date: 29-08-2024  
Place: Mumbai**



## ANNEXURE II- NOMINATION & REMUNERATION POLICY

### INTRODUCTION:

In terms of Section 178 of the Companies Act, 2013 this policy on Nomination and Remuneration of Directors, Key Managerial Personnel (KMP) and Senior Management of M/s. Shreenath Investment Company Limited have been formulated by the Nomination and Remuneration Committee. This policy shall act as guidelines on matters relating to the remuneration, appointment, removal and evaluation of performance of the Directors, Key Managerial Personnel and Senior Management.

### 1. DEFINITION:

In this policy unless the context otherwise requires:

- ✚ Act means The Companies Act, 2013 and rules made thereunder, as amended from time to time;
- ✚ Company means “**Shreenath Investment Company Limited**”;
- ✚ Board means Board of Directors of M/s. Shreenath Investment Company Limited;
- ✚ Independent Director means a Director referred to in Section 149 (6) of The Companies Act, 2013
- ✚ Committee means “**Nomination and Remuneration Committee**” of the Company as constituted by the Board from time to time;
- ✚ Key Managerial Personnel or KMP means Managing Director, Joint Managing Director, Whole-time Director, Chief Financial Officer, Company Secretary and such other persons who may be deemed to be KMP under the Companies Act, 2013;
- ✚ Senior Management Personnel means personnel of the Company comprising of all members of management one level below the executive directors including the functional heads. The designation and categories of such Personnel will be determined by the Company based on the functional and reporting structure;

The words and expressions used but not defined herein, but defined under the Companies Act, 2013 shall have the meaning assigned therein.

**2. APPLICABILITY:**

- a) Directors (Executive and Non-Executive)
- b) Key Managerial Personnel
- c) Senior Management Personnel
- d) Other Employees

**3. CONSTITUTION OF THE NOMINATION AND REMUNERATION COMMITTEE:**

The Board has the power to constitute / reconstitute the Committee from time to time in order to make it consistent with other policies and applicable statutory requirements. This is in line with the requirements of the Companies Act, 2013 ("Act").

**4. KEY OBJECTIVES OF THE COMMITTEE:**

- a) To guide the Board in relation to the appointment and changes in Directors, Key Managerial Personnel and Senior Management.
- b) To evaluate the performance of the Members of the Board and provide necessary report to the Board for further evaluation;
- c) To recommend to the Board on remuneration payable to the Directors, Key Managerial Personnel and Senior Management;
- d) To develop a succession plan for the Board and to regularly review the plan;
- e) To determine remuneration based on Company's financial position, trends and practices on remuneration prevailing in the industry;
- f) Consider any other matters as may be requested by the Board.

**5. MEETINGS:**

The meeting of the Committee shall be held at regular intervals as deemed fit and appropriate.

The Chairman of the Committee or in his absence any other member of the Committee authorized by him on his behalf shall attend general meetings of the Company.

**6. COMMITTEE MEMBERS INTEREST:**

A member of the Committee is not entitled to participate in the discussions when his/her own remuneration is discussed at a meeting or when his/her performance is being evaluated.

**7. APPOINTMENT OF DIRECTOR, KEY MANAGERIAL PERSONNEL & SENIOR MANAGEMENT - CRITERIA & QUALIFICATION:**

The appointment of Director, Key Managerial Personnel and Senior Management will be based on the outcome of strategic planning.

The Committee shall consider the standards of qualification, expertise and experience of the candidates for appointment as Director, Key Managerial Personnel and Senior Management and accordingly recommend to the Board his/her appointment.

A person should possess adequate qualification, expertise and experience for the position he / she is considered for appointment. The Committee has discretion to decide whether qualification, expertise and experience possessed by a person is sufficient / satisfactory for the concerned position.

**8. TERM / TENURE:****a) Managing director/whole-time director:**

The Company shall appoint or re-appoint any person as its Executive Chairman, Managing Director or Executive Director for a term not exceeding five years at a time.

**b) Independent Director:**

An Independent Director shall hold office for a term up to five consecutive years on the Board of the Company and will be eligible for re-appointment on passing of a special resolution by the Company and disclosure of such appointment in the Board's report.

No Independent Director shall hold office for more than two consecutive terms of up to maximum of 5 years each, but such Independent Director shall be eligible for appointment after expiry of three years of ceasing to become an Independent Director. Provided that an Independent Director shall not, during the said period of three years, be appointed in or be associated with the Company in any other capacity, either directly or indirectly.

**9. EVALUATION:**

The Committee shall carry out evaluation of performance of every Director, KMP and Senior Management Personnel at regular interval (yearly).

**10. REMOVAL:**

Due to reasons for any disqualifications mentioned in the Act or under any other applicable Act, rules and regulations there under, the Committee may recommend, to the Board with reasons recorded in writing, removal of a Director, KMP or Senior Management Personnel subject to the provisions and compliance of the said Act, rules and regulations

**11. RETIREMENT:**

The Directors, KMP and Senior Management Personnel shall retire as per the applicable provisions of the Act and the prevailing policy of the Company. The Board will have the discretion in retain the Director, KMP, Senior Management Personnel in the same position/remuneration or otherwise even after attaining the retirement age, for the benefit of the Company

**12. AMENDMENTS TO THE NOMINATION AND REMUNERATION POLICY:**

The Board of Directors on its own and/or as per the recommendations of Nomination and Remuneration Committee may amend this policy, as deemed fit from time to time.

**For and on behalf of the Board**

**Sd/-  
Jatin Ramanlal Jain  
Managing Director  
DIN: 08521872**

**Sd/-  
Ashwin Pukhraj Jain  
Director  
DIN: 00173983**

**Date: 29-08-2024  
Place: Mumbai**

**ANNEXURE III****Vigil Mechanism / Whistle Blower Policy**

**(Pursuant to Section 177 of the Companies Act, 2013 and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014)**

**I. PREFACE:**

1. The Company believes in conducting its business affairs in fair and transparent manner by adherence to high standard of professionalism, integrity, honesty, prudence and ethical behavior. The company is committed to create a culture where its director or employees feel safe in reporting of any unethical practices or event of fraud, misconduct or violations.
2. Section 177 of the Companies Act, 2013 (“the Act”) and Rule 7 of the Companies (Meetings of Board and its Powers) Rules, 2014, inter alia, provides for establishment of a mechanism called ‘Vigil Mechanism’ for Directors and Employees to report their genuine concerns or grievances, such as instances of unethical behavior, actual or suspected, fraud or violation of the code for Directors and Employees. The Act further requires every listed Company, to establish such vigil mechanism.
3. The objective of this policy is to encourage employees to bring ethical and legal violations they are aware of to an internal authority so that action can be taken immediately to resolve the problem. This policy provides a framework to promote responsible and secure whistle blowing.
4. A vigil mechanism not only helps to detect fraud in organizations, but is also used as a corporate governance tool, which prevents and deters fraudulent activity.

The policy neither releases employees from their duty of confidentiality in the course of their work, nor is it a route for taking up a grievance about a personal situation or vendetta.

This policy should be read in conjunction with applicable laws and regulations.

## II. DEFINITIONS

“**Act**”: means Companies Act, 2013;

“**Company**”: means Shreenath Investment Company Limited.

“**Employees**”: means every employee of the Company (whether working in India or abroad) and includes director of the Company;

“**Protected Disclosure**”: means a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity. Protected Disclosures should be factual and not speculative in nature;

“**Subject**”: means a person against or in relation to whom a Protected Disclosure has been made or evidence gathered during the course of an investigation;

“**Whistle Blower**”: means a Director or an employee making Protected Disclosure under this policy;

## III. SCOPE & PROCEDURE

The Whistle Blower Policy shall be operated and administered by Mr. Bhavya Dilip Sundesha, Chairman of the Audit Committee, to whom employees may report their concerns. The Director nominated to administer this Policy may issue necessary guideline/timeline for operation of this Policy. In case of repeated frivolous complaints being filed by the employees, the Member of the Audit Committee may take suitable action against the concerned employee including reprimand.

The Employees of the Company are eligible to make Protected Disclosures under the Policy in relation to matters concerning the Company. The role of Whistle Blower's is of reporting party with reliable information.

All Protected Disclosures shall be addressed to the Director nominated to operate and administer this Policy. Protected disclosure shall be made in writing under the covering letter signed by the complainant within 30 days of the occurrence of the concern/event or before occurrence to the chairman of the Audit Committee by hand delivery or Speed/Regd. post or Fax or Email. The Contact details of the Director so nominated are as follows:

- Name and Address – Mr. Bhavya Dilip Sundesha – Chairman (Audit Committee)  
405 Jai Siddhivinayak Building 13 Ardeshir, Daddy  
Cross Lane, C P Tank Girgaon, Mumbai - 400004  
Maharashtra, India  
Contact: 6638 1800
  
- Name and Address – Mr. Jatin Jain- Member (Audit Committee)  
2501, Lodha Prima Dr. E Borges Road,  
Opp. KEM Hospital, Parel, Mumbai-400012  
(There was reconstitution of the Committee with respect to  
resignation of Mr. Vikas Mapara from 27/03/2024)

Care must be taken to keep the identity of Whistle Blower confidential. Unfair treatment will not be meted out to a Whistle Blower because of reporting a Protected Disclosure under this Policy. The identity of the Whistle Blower shall be kept confidential to the extent possible as permitted under law.

On receipt of the protected disclosure, the Chairman, shall make a record of the Protected Disclosure and also ascertain from the complainant whether he was the person who made the protected disclosure or not.

#### **IV. DISQUALIFICATION**

Employees of the company shall be protected from any kind of unfair treatment after making the Protected Disclosures, however, any misuse of this mechanism will warrant disciplinary action. Protection under this Policy would not mean protection from disciplinary action arising out of careless or false or bogus allegations made by a Whistle Blower knowing it to be false or bogus or with a mala fid intention. Policy should not be used for raising malicious or unfounded allegations against colleagues.

#### **V. INVESTIGATION**

All Protected Disclosures reported under this Policy shall be investigated by the Concerned Director. Where initial inquiry indicates that the concern has no basis or it is not a matter to be investigated under this Policy, then it may be dismissed at this stage and no further investigation shall be carried on. If initial inquiry indicates that further investigation is necessary, then detailed investigation shall be conducted. The concerned Director may take the help of outside expert for assistance.

Subject will normally be informed regarding allegations made against him and have opportunities for providing his inputs to facilitate the investigation. Subject shall be given the



opportunity to respond to findings contained in the investigation report, unless there are compelling reasons not to do so. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.

Investigators shall take all requisite steps including technical & other resources for fact-finding and analysis of the Protected Disclosure. Investigators shall act independently and unbiased. Investigators have a duty of fairness, objectivity, thoroughness, ethical behaviour and observance of legal and professional standards.

After investigation of the Protected Disclosure if it is found that an improper or unethical act has been committed, the concerned Director shall recommend to the management of the Company to take such disciplinary or corrective action as the concerned Director may deem fit. It is clarified that any disciplinary or corrective action initiated against the Subject as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable employee or personnel conduct and disciplinary procedures.

## **VI. CONFIDENTIALITY**

The Whistle Blower, the Subject, the Whistle Officer, the Investigator, and everyone involved in the process shall:

- a. maintain complete confidentiality/ secrecy of the matter
- b. not to keep the papers unattended anywhere at any time
- c. keep the electronic mails/files under password
- d. not to discuss the matter in any informal/social gatherings/ meetings
- e. discuss only to the extent or with the persons required for the purpose of completing the process and investigations

If anyone is found not complying with the above, he/ she shall be held liable for such disciplinary action as is considered fit.

**VII. RETENTION OF DOCUMENTS**

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of five years.

**VIII. REVIEW/ AMENDMENT**

The Board may review this Policy as and when it deems appropriate. The Company reserves the right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding on the Employees and directors unless the same is notified to the Employees and directors in writing.

If due to subsequent amendment in the laws, this policy or any part hereof becomes inconsistent with the law, the provisions of law shall prevail and this policy shall be deemed to be amended to that extent.

**For and on behalf of the Board**

**Sd/-**  
**Jatin Ramanlal Jain**  
**Managing Director**  
**DIN: 08521872**

**Sd/-**  
**Ashwin Pukhraj Jain**  
**Director**  
**DIN: 00173983**

**Date: 29-08-2024**  
**Place: Mumbai**

**ANNEXURE - IV- SECRETARIAL AUDIT REPORT**

**Form No. MR-3**

**SECRETARIAL AUDIT REPORT**

FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024

*[Pursuant to section 204(1) of the Companies Act, 2013 and rule No.9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]*

To,  
The Members,  
**Shreenath Investment Company Limited**

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Shreenath Investment Company Limited** (hereinafter called the 'Company'). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of Shreenath Investment Company Limited's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, we hereby report that in our opinion, the Company has, during the audit period covering the financial year ended on **31<sup>st</sup> March, 2024**, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on **31<sup>st</sup> March, 2024** according to the provisions of:

- (1) The Companies Act, 2013 ('the Act') and the rules made thereunder;
- (2) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (3) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (4) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings **(Not applicable to the Company during the Audit Period)**;
- (5) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'): -
  - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as amended from time to time;
  - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;
  - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable to the Company during the Audit Period)**;
  - (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not applicable to the Company during the Audit Period)**;
  - (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not applicable to the Company during the Audit Period)**;
  - (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client **(Not applicable to the Company during the Audit Period)**;
  - (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **(Not applicable to the Company during the Audit Period)**;
  - (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not applicable to the Company during the Audit Period)**.

We have also examined compliance with the applicable clauses of:

- (i) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(ii) The Secretarial Standards issued by The Institute of Company Secretaries of India (SS-1 & SS-2).

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above.

### **We further report that**

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act.

Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

During the period, all the decisions in the Board Meetings were carried unanimously.

We have relied on the representation made by the Company, its Officers and Reports of the Statutory Auditor for the systems and mechanism framed by the Company for compliances under other Acts, Laws and Regulations applicable to the Company.

**We further report that** there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

**We further report that** during the audit period there were no specific events/ actions having a major bearing on the Company's affairs.

For Pramod S. Shah & Associates  
(Practising Company Secretaries)

**Place: Mumbai**

**Date: 29.08.2024**

Sd/-  
Pramod S. Shah  
Partner  
Membership No.: 334 (FCS)  
C O P No.: 3804  
UDIN: F000334F001068907

**ANNEXURE - V**

**Form No. AOC-2**

*(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies*

*(Accounts) Rules, 2014)*

**Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto**

- 1. Details of material contracts or arrangements or transactions not at arm's length basis: NIL**
- 2. Details of material contracts or arrangement or transactions at arm's length basis:**

(a) Name(s) of the related party and nature of relationship: **NA.**

(b) Nature of contracts/arrangements/transactions: **NA**

(c) Duration of the contracts / arrangements/transactions: **NA**

(d) Salient terms of the contracts or arrangements or transactions including the value, if any: **NA**

(e) Date(s) of approval by the Board, if any: **NA**

(f) Amount paid as advances, if any: **NIL**

**For and on behalf of the Board**

**Sd/-  
Jatin Ramanlal Jain  
Managing Director  
DIN: 08521872**

**Sd/-  
Ashwin Pukhraj Jain  
Director  
DIN: 00173983**

**Date: 29-08-2024**

**Place: Mumbai**

**ANNEXURE-VI**

Details pertaining to remuneration as required under section 197(12) read with Rule 5(1) of Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

The percentage increase in remuneration of each Director, Chief Financial Officer and Company Secretary during the Financial Year 2023-24, ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the Financial Year 2023-24 and the comparison of remuneration of each Key Managerial Personnel (KMP) against the performance of the Company are as under:

Sr. No.	Name of Director/ KMP	Designation	Remuneration of Director/KMP for the Financial Year 2023-24(Excluding perquisite value of ESOPs exercised)	Remuneration of Director / KMP for the Financial Year 2023-24 (Including perquisite value of ESOPs exercised)	% increase in Remuneration in the Financial Year 2023-24 (Excluding perquisite value of ESOPs exercised)	% increase in Remuneration in the Financial Year 2023-24 (Including perquisite value of ESOPs exercised)	Ratio of Remuneration of each Director to median remuneration (Including perquisite value of ESOPs exercised) of employees for the Financial Year	Comparison of the Remuneration of the KMP against the performance of the Company (Excluding perquisite value of ESOPs exercised)	Comparison of the Remuneration of the KMP against the performance of the Company (Including perquisite value of ESOPs exercised)
1	Priya Dhanuka	Company Secretary	0	0	0	0	0	0	0
2	Mayur Kadakia	Chief Financial Officer							
3.	Vikas Mapara*	Managing Director							
4.	Jatin Jain*	Managing Director							

\*Mr. Vikas Mapara (Managing Director) resigned from the Directorship of the Company w.e.f. 27<sup>th</sup> March, 2024. Further Mr. Jatin Jain was appointed as Additional Managing Director in the Company w.e.f. 27<sup>th</sup> March, 2024 and his appointment was regularised in the Extra Ordinary General Meeting held on 15<sup>th</sup> July, 2024.

**For and on behalf of the Board**

**Sd/-**  
**Jatin Ramanlal Jain**  
**Managing Director**  
**DIN: 08521872**

**Sd/-**  
**Ashwin Pukhraj Jain**  
**Director**  
**DIN: 00173983**

**Date: 29-08-2024**  
**Place: Mumbai**



**ANNEXURE -VII*****MANAGEMENT DISCUSSION AND ANALYSIS REPORT*****Industry Structure and Developments:****Global economic overview**

Global economic growth declined from 3.5% in 2022 to an estimated 3.1% in 2023. A disproportionate share of global growth in 2023-24 is expected to come from Asia, despite the weaker-than-expected recovery in China, sustained weakness in USA, higher energy costs in Europe, weak global consumer sentiment on account of the Ukraine-Russia war, and the Red Sea crisis resulting in higher logistics costs. A tightening monetary policy translated into increased policy rates and interest rates for new loans.

Growth in advanced economies is expected to slow from 2.6 percent in 2022 to 1.5 percent in 2023 and 1.4 percent in 2024 as policy tightening takes effect. Emerging market and developing economies are projected to report a modest growth decline from 4.1 percent in 2022 to 4.0 percent in 2023 and 2024. Global inflation is expected to decline steadily from 8.7 percent in 2022 to 6.9 percent in 2023 and 5.8 percent in 2024, due to a tighter monetary policy aided by relatively lower international commodity prices. Core inflation decline is expected to be more gradual; inflation is not expected to return to target until 2025 in most cases. The US Federal Reserve approved a much-anticipated interest rate hike that took the benchmark borrowing costs to their highest in more than 22 years.

Global trade in goods was expected to have declined nearly US\$2 trillion in 2023; trade in services was expected to have expanded US\$500 billion. The cost of Brent crude oil averaged \$83 per barrel in 2023, down from \$101 per barrel in 2022, with crude oil from Russia finding destinations outside the European Union and global crude oil demand falling short of expectations.

**Indian economic overview**

The Indian economy was estimated to grow 7.8 percent in the 2023-24 fiscal against 7.2 per cent in 2022-23 mainly on account of the improved performance in the mining and quarrying, manufacturing and certain segments of the services sector. India retained its

position as the fifth largest economy. The Indian rupee displayed relative resilience compared to the previous year; the rupee opened at H82.66 against the US dollar on the first trading day of 2023 and on 27 December was H83.35 versus the greenback, a depreciation of 0.8%.

In FY 2023-24, the CPI inflation averaged 5.4 percent with rural inflation exceeding urban inflation. Lower production and erratic weather led to a spike in food inflation. In contrast, core inflation averaged at 4.5 percent, a sharp decline from 6.2 percent in FY 23.

The softening of global commodity prices led to a moderation in core inflation.

The nation's foreign exchange reserves achieved a historic milestone, reaching \$645.6 billion. The credit quality of Indian companies remained strong between October 2023 and March 2024 following deleveraged Balance Sheets, sustained domestic demand and government-led capital expenditure. Rating upgrades continued to surpass rating downgrades in H2 FY24. UPI transactions in India posted a record 56 per cent rise in volume and a 43 per cent rise in value in FY24.

### **Outlook**

India withstood global headwinds in 2023 and is likely to remain the world's fastest-growing major economy on the back of growing demand, moderate inflation, stable interest rates and robust foreign exchange reserves. The Indian economy is anticipated to surpass USD 4 trillion in 2024-25.

### **Segment-wise or product-wise performance:**

The Company primarily operates in single business and geographical segment

As compared to the previous reporting period, the company has shown an increase in income.

The Company, with superior Investment idea, will focus on positioning the revenues and lead towards high growth path in future.

### **Risks, Concerns and Threats**

It must be understood that a risk-free investment does not exist, but investment funds vary between being low risk and high risk. Even cash held with a financially secure

bank is exposed to inflation risk (the risk that rising prices will erode the 'real' value or purchasing power of the cash held on deposit) and counterparty risk (the risk that the bank is unable to meet its financial obligations, i.e. return a depositor's money).

**Internal control systems and their adequacy:**

Your Company ensures that appropriate risk management limits, control mechanisms and mitigation strategies are in place through its efficient and effective Internal Control System and the same completely correspond to its size, scale and complexity of operations. The Company strives to put several checks and balances in place to ensure that confidentiality is maintained. Effective procedures and mechanisms are rolled out by a full-fledge Internal Audit System to ensure that the interest of the Company is safeguarded at all times. In addition to this, the Risk Assessment policy of the organization is reviewed on a quarterly basis by the Audit Committee / Board of Directors of your Company to ensure that its robustness is reinforced in keeping with the requirements of a dynamic business environment.

**Discussion on financial performance with respect to operational performance:**

Total income achieved during the year under review is Rs. 6302.54 lakhs as against Rs. 187.44 Lakhs in the previous year. After all Expenses, Depreciation and Taxation, the net profit of the Company is Rs. 267.89 lacs as against the profit after tax of Rs. 103.09 Lacs in the previous year.

**Cautionary Statement:**

Your Company endeavours to perform and attempt to deliver the best at all times. However, the statements made in this report describing the Company's objectives, expectations or predictions shall be read in conjunction with the government policies as issued and amended from time to time, the micro as well as macroeconomic scenario prevailing at that time, global developments and such other incidental factors that may extend beyond the control of the Company and Management.

Keeping this in view, the actual results may materially vary from those expressed in the statement.

**Material developments in Human Resources / Industrial Relations front, including number of people employed:**

The Company continuously strives to attract and retain the best talent from the local markets, clearly define their roles and responsibilities, create an inspiring and rewarding work environment, imparting training to them and creating development opportunities for increasing employee knowledge and efficiency to make them future ready and create career opportunities within.

The Company is committed in ensuring that the work environment at all its locations is conducive to fair, safe and harmonious relations between employees. In strongly believes in maintaining the dignity of all its employees, irrespective of their gender or seniority. Discrimination and harassment of any type are strictly prohibited.

**Details of any changes in Return on Net Worth as compared to the immediately previous financial year:**

Return on Net Worth, the company continues to maintain healthy return on net worth in FY 24 at 39%

**By order of the Board of Directors  
For Shreenath Investments Company Limited**

Sd/-

**Jatin Ramanlal Jain  
Managing Director  
DIN:- 08521872**

**Place: Mumbai  
Date: 29-08-2024**

**Annexure VIII- Annual Report on CSR Activities**

**1. Brief outline on CSR Policy of the Company:**

The Company always believes in a philosophy of adopting sustainable business practices which are beneficial to the various stakeholders including the society. Through its corporate values, the Company constantly endeavours to actively contribute to the social and economic development of the communities in which it operates.

The Company always believed in giving back to the society and recognized its role and responsibility as a corporate citizen. The Company has social values ingrained into its culture and manner of working.

The objective of the CSR Policy is to frame the guiding principles in undertaking various programs and projects by or on behalf of the company relating to CSR within the meaning of the Act.

**2. Composition of CSR Committee:**

The Company has constituted the CSR Committee during the financial year, as per the provisions of Section 135 of the Act and details of its members as on the end of the financial year are as follows:

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1	Mr. Bhavya Dilip Sundesha	Independent Director	1	1
2	Ms. Renu Jain	Independent Director	1	1
3	Mr. Vikas Mapara Resigned w.e.f. 27.03.2024	Managing Director	1	1
4.	Mr. Jatin Jain	Managing Director	1	0

\*There was a reconstitution in CSR Committee post March,2024. After resignation of Mr. Vikas Mapara, Mr Jatin Jain was appointed on 27<sup>th</sup> March,2024.

**3. Provide the web-link(s) where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company- <https://shreenathinvestment.in/>**

4. Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social Responsibility Policy) Rules, 2014, -  
NA

5.

- (a) Average net profit of the company as per sub-section (5) of section 135: Nil
- (b) Two percent of average net profit of the company as per sub-section (5) of section 135.: Nil
- (c) Surplus arising out of the CSR projects or programmes or activities of the previous financial years: Nil
- (d) Amount required to be set off for the financial year, if any: Nil
- (e) Total CSR obligation for the financial year [(b)+ (c) – (d)]: Nil

6.

- (a) Amount spent on CSR Projects (both Ongoing Project and other than Ongoing Project): NA
- (b) Amount spent in Administrative Overheads: NA
- (c) Amount spent on Impact Assessment, if applicable: NA
- (d) Total amount spent for the Financial Year [(a)+(b) +(c)]: NA
- (e) CSR amount spent or unspent for the financial year: NA

Total Amount Spent for the Financial Year (In Rs.)	Amount Unspent (in Rs.)				
	NA	Total Amount transferred to Unspent CSR Account as per subsection (6) of section 135.		Amount transferred to any fund specified under Schedule VII as per second proviso to sub-section (5) of section 135.	
Amount		Date of transfer	Name of the Fund	Amount.	Date of transfer
NA		NA	NA	NA	NA

(f) Excess amount for set-off, if any - NA

Sr. No	Particular	Amount (in Rs.)
(1)	(2)	(3)

(i)	Two percent of average net profit of the company as per sub-section (5) of section 135	
(ii)	Total amount spent for the Financial Year	
(iii)	Excess amount spent for the Financial Year [(ii)-(i)]	
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous Financial Years, if any	
(v)	Amount available for set off in succeeding Financial Years [(iii)-(iv)]	

7. Details of Unspent Corporate Social Responsibility amount for the preceding three Financial Years:

(1)	(2)	(3)	(4)	(5)	(6)		(7)	(8)	
Sl. No.	Preceding Financial Year(s)	Amount transferred to Unspent CSR Account under subsection (6) of section 135 (in Rs.).	Balance Amount in Unspent CSR Account under subsection (6) of section 135 (in Rs.)	Amount Spent in the Financial Year (in Rs.)	Amount transferred to a Fund as specified under Schedule VII as per second proviso to subsection (5) of section 135, if any	Amount (In Rs)	Date of Transfer	Amount remaining to be spent in succeeding Financial Years (in Rs)	Deficiency, if any
1.									
2.									
3.									
	Total								

8. Whether any capital assets have been created or acquired through Corporate Social Responsibility amount spent in the Financial Year: Yes/No - NA

If Yes, enter the number of Capital assets created/ acquired – NA

Furnish the details relating to such asset(s) so created or acquired through Corporate Social Responsibility amount spent in the Financial Year: NA

Sr. No	Short particulars of the property or asset(s) [including complete address and location of the property]	Pincode of the property or asset(s)	Date of creation	Amount of CSR amount spent	Details of entity/ Authority/ beneficiary of the registered owner		
					CSR Registration Number, if applicable	Name	Registered address
1	2	3	4	5	6		
					CSR Registration Number, if applicable	Name	Registered address

9. Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per subsection (5) of section 135 - NA

**Jatin Ramanlal Jain**  
**Managing Director**  
**DIN:- 08521872**

**Bhavya Dilip Sundesha**  
**Chairperson**  
**DIN:- 09651332**

**Place: Mumbai**  
**Date: 29-08-2024**



## ANNEXURE- IX

**CORPORATE GOVERNANCE REPORT****(As required under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015)**

The Directors provides the Company's Report on Corporate Governance for the financial year 2023-24.

**1. COMPANY'S PHILOSOPHY ON CODE OF CORPORATE GOVERNANCE:**

Corporate Governance is the application of best management practices, compliance of laws and adherence to ethical standards to achieve the Company's objective of enhancing stakeholder value and discharge of social responsibility. The Corporate Governance framework includes corporate structures, culture, policies and the manner in which the corporate entity deals with various stakeholders, with transparency being the key word. Accordingly, timely, adequate and accurate disclosure of information on the performance and ownership forms the cornerstone of Corporate Governance. It is a journey for constantly improving sustainable value creation and an upward moving target. Integrity, transparency, fairness, accountability and compliance with the law are embedded in the Company's robust business practices to ensure ethical and responsible leadership both at the Board and at the Management level.

The Corporate Governance philosophy of Shreenath Investment Company Limited is based on the following principles:

1. Management must have the executive freedom to drive the enterprise forward without undue restraints and Management is the trustee of the shareholders capital and not the owner. This freedom of management should be exercised within a framework of effective accountability.
2. Provide an enabling environment to harmonize the goals of maximizing stakeholder value and maintaining a customer centric focus.
3. Have a simple and transparent corporate structure driven solely by business needs.
4. Communicate externally, in a truthful manner, about how the Company is running internally.
5. Make clear distinction between personal conveniences and corporate resources.

6. Be transparent and maintain a high degree of disclosure levels in all facets of its operations.
7. Satisfy the spirit of the law and not just the letter of the law.
8. Our philosophy on Corporate Governance is thus concerned with the ethics, values and morals of Shreenath Investment Company Limited and its Directors, who are expected to act in the best interests of the Company and remain accountable to shareholders and other beneficiaries for their action.

**2. BOARD OF DIRECTORS:**

The Board of Directors and its Committees play a fundamental role in upholding and nurturing the principles of good governance which translates into ethical business practices, transparency and accountability in the Company’s dealing with its members and other stakeholders and the utilization of resources for creating sustainable growth and societal wealth.

Shreenath Investment Company Limited has a very balanced and diverse Board of Directors, who actively participates at the Board and Committee Meetings by providing valuable guidance to the Management on various aspects of business, policy direction, governance, compliance etc. and plays a critical role on strategic issues.

**a. Composition of the Board of Directors:**

The name and category of Director on the Board, the number of Directorship held by them in other Company and numbers of the Committees in which they are the Member or Chairman are given herein below: (Other than Shreenath Investment Company Limited)

Sr. No.	Name of the Director	Category of the Director	No. of Directorships in each Companies		No. of Membership/ Chairmanship of other Board Committee	
			Public	Private	Member	Chairman
1	Mr. Jatin Jain	Managing Director	-	-	-	-

2	Mr. Ashwin Jain	Director	-	7	-	-
3	Mr. Ritesh Chopra	Independent Director	-	-	-	-
4	Ms. Renu Jain	Independent Director	-	-	-	-
5	Mr. Bhavya Sundesha	Independent Director	-	-	-	-

**b. Number and dates of Meetings along with the attendance of the Directors in the Board Meetings and the Annual General Meeting:**

The following are the details of the Meetings of the Board and Annual General Meeting held during the financial year 2023-24:

Sr. No.	Attendance at the Board Meetings held on	Name of the Directors					
		Mr. Vikas Mapara	Mr. Ashwin Jain	Mr. Jatin Jain	Mr. Ritesh Chopra	Ms. Renu Jain	Mr. Bhavya Sundesha
1	12.04.2023	√	√	-	√	√	√
2	30.05.2023	√	√	-	√	√	√
3	12.07.2023	√	√	-	√	√	√
4	03.08.2023	√	√	-	√	√	√
5	10.08.2023	√	√	-	√	√	√
6	25.08.2023	√	√	-	√	√	√
7	31.08.2023	√	√	-	√	√	√
8	26.10.2023	-	√	-	√	√	√
9	01.11.2023	-	√	-	√	√	√
10	22.12.2023	-	√	-	√	√	√
11	06.02.2024	√	√	-	√	√	√
12	27.03.2024	-	√	√	√	√	√
7	Attendance at the Annual	-	√	-	√	√	-

General Meeting Held on 30.09.2023							
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**c. Relationship between the Directors inter-se:**

None of the Directors are related to each other.

**d. Number of shares and convertible instruments held by the Non-Executive Director in the Company:**

None of the Non-Executive Directors of the Company hold any securities in the Company.

**e. Familiarization programs imparted to Independent directors:**

Independent Directors play an important role in the governance processes of the Board. They bring to bear their expertise and experience on the deliberations of the Board. This enriches the decision-making process at the Board with different points of view and experiences and prevents conflict of Interest in the decision making.

At the time of appointing a Director, a formal letter of appointment is given to him/her and the details pertaining to their roles, responsibilities, functions and the Board’s expectation are explained in the Meeting.

In furtherance to the above, the Company holds Business Review Meeting every quarter to explain the details of the performance of the Company. Further, Directors’ Vision Meeting is held annually to set the strategic directions of the Company.

The details of Familiarization programs imparted to Independent directors are as follows:

<b>Number of programs attended by Independent Director</b>	<b>Number of hours spent by Independent Director during the year (Business Review Meetings and Vision and Strategy Meeting.)</b>	<b>Number of hours spent by Independent Director on cumulative basis till date</b>
27.04.2016	1 hour	1 hour

28.07.2016	2 hours	3 hours
08.11.2016	1 hour and 30 minutes	4 hours and 30 minutes
02.02.2017	1 hour and 30 minutes	6 hours
21.06.2017	1 hour and 30 minutes	7 hours and 30 minutes
21.12.2017	1 hour and 30 minutes	9 hours
14.02.2018	1 hour	10 hours
14.02.2019	1 hour	11 hours
04.02.2020	30Min	11 hours 30min
05.02.2021	30Min	12 hours
14.02.2022	1 hour	13 hours
15.02.2023	1 hour	14 hours
06.02.2024	30 mins	14 hours 30 min

Weblink: [www.shreenathinvestment.in/](http://www.shreenathinvestment.in/)

**f. Board's Functioning & Procedures:**

The Board has complete access to any information within the Company. At Meetings of the Board, it welcomes the presence of Senior Management who can provide additional insights into the items being discussed.

The items placed at the Meeting of the Board include the following:-

- i. Unaudited Quarterly/Half Yearly financial results and Audited Annual Accounts of the Company, results and capital employed, for consideration and approval;
- ii. Minutes of Meetings of Audit Committee, Stakeholders Relationship Committee/Shareholders Grievance Committee and Nomination and Remuneration Committee;
- iii. Abstracts of circular resolutions passed;
- iv. General notices of interest;
- v. Sale and/or purchase of investments, fixed assets;
- vi. Review compliance of all laws applicable to the Company including the requirements of the Securities and Exchange Board of India (Listing

Obligations and Disclosure Requirements) Regulations, 2015 with the Stock Exchanges and steps taken by the Company to rectify instances of non-compliances, if any;

- vii. Related party transactions;
- viii. Reviewing the Company’s Financial and Risk Management policies;
- ix. Reviewing the business plan and strategy of the Company.

All the items in the Agenda are accompanied by notes giving comprehensive information on the related subject and in certain matters such as financial/business plans and financial results, detailed presentations are made. The agenda and the relevant notes are sent in advance separately to each Director to enable the Board to take informed decisions. The Minutes of the Meetings of the Board are circulated through email to all Directors and confirmed at the subsequent Meeting. The Minutes of the Audit Committee, Nomination and Remuneration Committee and Stakeholder’s Relationship Committee/ Shareholders’ Grievance Committee are also circulated through email to all Members and thereafter tabled for discussion at the subsequent Board Meeting.

g. The board confirms that in the opinion of the board, the independent directors fulfill the conditions specified in these regulations and are independent of the management.

**3. SKILLS**

The following is the list of core skills / expertise / competencies identified by the Board of Directors as required in the context of the Company’s business and that the said skills are available with the Board Members:

SN o	Skills / Expertise / Competence	Name of The Directors who have such skills / expertise / competence
1	Knowledge on Company’s businesses (Chemical Intermediates), policies and culture (including the Mission, Vision and Values) major risks / threats and potential opportunities and knowledge of the industry in which the Company operates;	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director Mr Ritesh Chopra- Independent Director Ms. Renu Jain- Independent Director Mr. Bhavya Sundesha- Independent Director
2	Behavioral skills - attributes and competencies to use their	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director

	knowledge and skills to contribute effectively to the growth of the Company;	Mr. Ritesh Chopra- Independent Director Ms. Renu Jain- Independent Director Mr. Bhavya Sundesha- Independent Director
3	Business Strategy, Sales & Marketing, Corporate Governance, Forex Management, Administration, Decision Making	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director Mr. Ritesh Chopra- Independent Director Ms. Renu Jain- Independent Director Mr. Bhavya Sundesha- Independent Director
4	Financial and Management skills	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director Mr. Ritesh Chopra- Independent Director Ms. Renu Jain- Independent Director Mr. Bhavya Sundesha- Independent Director
5	Legal expertise	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director Ms. Renu Jain- Independent Director Mr. Ritesh Chopra- Independent Director Mr. Bhavya Sundesha- Independent Director
6	Technical / Professional skills and specialized knowledge in relation to Company's business	Mr. Jatin Jain- Managing Director Mr. Ashwin Jain- Director Mr. Ritesh Chopra- Independent Director Ms. Renu Jain- Independent Director Mr. Bhavya Sundesha- Independent Director

The Board at its meeting held on 12<sup>th</sup> April, 2023 reviewed the declaration of independence submitted by the Independent Directors and carried out due assessment of the veracity of the same noting that the Independent Directors of the Company fulfill the conditions specified in the Listing Regulations and are independent of the management.

#### **4. COMMITTEES OF THE BOARD:**

The Company has developed all the necessary Committees of the Board namely:

- a. Audit Committee;
- b. Nomination & Remuneration Committee;
- c. Stakeholders Relationship Committee/ Shareholders' Grievances Committee.

d. Corporate Social Responsibility Committee

The constitution, terms of reference and the functioning of the above mentioned Committees of the Board is explained herein.

The Board reviews the functioning of these committees from time to time. The Chairman of these Committees conducts the Meetings and also informs the Board about the summary of discussions held in the Committee Meetings. The Minutes of the Committee Meetings sent to all Directors are tabled at the respective Board / Committee Meetings.

**I. AUDIT COMMITTEE:**

Audit committee acts as a link between the Statutory Auditors, Internal Auditors and the Board of Directors. The primary objective of the Audit Committee is to provide effective supervision of the Management's Financial Reporting process with a view to ensure accurate, timely and proper disclosures.

**Composition of the Audit Committee: -**

The Audit Committee of the Company constituted in line with provisions of Section 177 of the Companies Act, 2013 and is in line with SEBI (LODR) Regulations, 2015.

The Audit Committee is duly formed and meets the requirement of the Companies Act, 2013 and also the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The composition of the Audit Committee as at 31.03.2024 and dates and details of the Members participation at the Meetings of the Committee are as under:



Sr. No	Name of the Director	Category	Attendance at the Audit Committee Meetings held on					
			12.04.2023	30.05.2023	30.08.2023	31.08.2023	26.10.2023	06.02.2024
1	Mr. Vikas Mapara	Member-Executive Director	√	-	√	√	-	√
2	Mr Ritesh Chopra	Member-Non-executive Independent Director	√	√	√	√	√	√
3	Mr. Bhavya Sundesha	Chairman-Non-Executive Independent Director,	√	√	√	√	√	√

All the Members on the Audit Committee possess the requisite qualification for appointment on the Committee and have sound knowledge of finance, accounting practices and Internal Control.

As prescribed under the Act, the Chairman of the Committee who is an Independent Director was present at the Annual General Meeting of the Company.

**i. Terms of Reference of the Audit Committee are as follows:**

1. Oversight of the company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible;
2. Recommendation for appointment, remuneration and terms of appointment of auditors of the company;
3. Approval of payment to statutory auditors for any other services rendered by the statutory auditors;

4. Reviewing with the management, the annual financial statements and auditor's report thereon before submission to the board for approval, with particular reference to:
  - a. Matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of clause (c) of sub-section 3 of section 134 of the Companies Act,2013;
  - b. Changes, if any, in accounting policies and practices and reasons for the same;
  - c. Major accounting entries involving estimates based on the exercise of judgment by management;
  - d. Significant adjustments made in the financial statements arising out of audit findings;
  - e. Compliance with listing and other legal requirements relating to financial statements;
  - f. Disclosure of any related party transactions;
  - g. Qualifications in the draft audit report;
5. Reviewing with the management, the quarterly financial statements before submission to the board for approval;
6. Reviewing with the management, the statement of uses / application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document / prospectus / notice and the report submitted by the monitoring agency monitoring the utilization of proceeds of a public or rights issue, and making appropriate recommendations to the Board to take up steps in this matter;
7. Review and monitor the auditor's independence and performance, and effectiveness of audit process;
8. Approval or any subsequent modification of transactions of the company with related parties;
9. Scrutiny of inter-corporate loans and investments;
10. Valuation of undertakings or assets of the company, wherever it is necessary;
11. Evaluation of internal financial controls and risk management systems;
12. Reviewing with the management, performance of statutory and internal auditors, adequacy of the internal control systems;

13. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit;
14. Discussion with internal auditors of any significant findings and follow up there on;
15. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board;
16. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern;
17. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;
18. To review the functioning of the Whistle Blower mechanism;
  - a. Every listed company or such class or classes of companies, as may be prescribed, shall establish a vigil mechanism for directors and employees to report genuine concerns in such manner as may be prescribed;
  - b. The vigil mechanism under sub-section (9) of Section 177 of Companies Act, 2013, shall provide for adequate safeguards against victimization of persons who use such mechanism and make provision for direct access to the chairperson of the Audit Committee in appropriate or exceptional cases;
19. Approval of appointment of CFO (i.e., the whole-time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience and background, etc. of the candidate;
20. The Audit Committee shall mandatorily review the following information:
  - a. Management discussion and analysis of financial condition and results of operations;
  - b. Statement of significant related party transactions (as defined by the Audit Committee), submitted by management;
  - c. Management letters/letters of internal control weaknesses issued by the

- statutory auditors;
- d. Internal audit reports relating to internal control weaknesses; and
  - e. The appointment, removal and terms of remuneration of the Chief internal auditor shall be subject to review by the Audit Committee.
21. The Audit Committee shall have powers, which should include the following:
- a. To investigate any activity within its terms of reference.  
The Audit Committee shall have authority to investigate into any matter in relation to the items specified in sub-section (4) of Section 177 of Companies Act, 2013, or referred to it by the Board and for this purpose shall have power to obtain professional advice from external sources and have full access to information contained in the records of the company;
  - b. To seek information from any employee;
  - c. To obtain outside legal or other professional advice;
  - d. To secure attendance of outsiders with relevant expertise, if it considers necessary.
22. When money is raised through an issue (public issues, rights issues, preferential issues etc.), the company shall disclose the uses / applications of funds by major category (capital expenditure, sales and marketing, working capital, etc.), on a quarterly basis as a part of their quarterly declaration of financial results to the Audit Committee.

Further, on an annual basis, the company shall prepare a statement of funds utilized for purposes other than those stated in the offer document / prospectus / notice and place it before the audit committee. Such disclosure shall be made only till such time that the full money raised through the issue has been fully spent. This statement shall be certified by the statutory auditors of the company. Furthermore, where the company has appointed a monitoring agency to monitor the utilization of proceeds of a public or rights issue, it shall place before the Audit Committee the monitoring report of such agency, upon receipt, without any delay. The audit committee shall make appropriate recommendations to the Board to take up steps in this matter.

All the items in the Agenda are accompanied by notes giving comprehensive information on the related subject and in certain matters such as financial results, detailed presentations are made. The Agenda and the relevant notes are sent in advance separately to each Member to enable the Committee to take informed decisions.

The Minutes of the Meetings of the Committee are circulated through email to

all the Members and confirmed at the subsequent Meeting.

**II. NOMINATION AND REMUNERATION COMMITTEE:**

The purpose of the Committee shall be to discharge the Board’s responsibilities relating to formulation of compensation plans and policies of the Company’s Executive Directors.

**i. Composition of the Nomination and Remuneration Committee:-**

The Company has framed Nomination and Remuneration Committee according to Section 178 of the Companies Act, 2013 and as per SEBI (LODR) Regulations, 2015.

The composition of the Nomination and Remuneration Committee as at 31.03.2024 and dates and details of the Members participation at the Meetings of the Committee are asunder:

Sr. No.	Name of the Director	Category	Attendance at the Nomination and Remuneration Committee Meeting held on	
			30.8.2023	31.08.2023
1	Mrs. Renu Jain	Member-Non-executive Independent Director	Yes	Yes
2	Mr. Ritesh Chopra	Member-Non-executive Independent Director	Yes	Yes
3	Mr. Bhavya Sundesha	Non-Executive Independent Director, Chairperson	Yes	Yes

**ii. Terms of Reference of the Nomination and Remuneration Committee are as follows:**

1. To formulate the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board a policy, relating to the remuneration of the directors, key managerial personnel and other employees;
2. To identify persons who are qualified to become directors and who may be

- appointed in senior management and recommend to the Board their appointment and removal and shall carry out evaluation of every director's performance;
3. To determine such policy, taking into account all factors which it deems necessary. The objective of such policy shall be to ensure that members of the executive management of the Company are provided with appropriate incentives to encourage enhanced performance and are, in a fair and responsible manner, rewarded for their individual contributions to the success of the Company;
  4. To review the ongoing appropriateness and relevance of the remuneration policy;
  5. To approve the design of any performance related pay schemes operated by the Company and approve the total annual payments made under such schemes;
  6. To consider any other matters relating to the remuneration of or terms of employment applicable to the remuneration of the Directors, Key Managerial Personnel and other employees.

**iii. Criteria for the Performance Evaluation of the Independent Directors Meeting:**

As required under section 178(2) of the Companies Act, 2013 and under Schedule IV to the Companies Act, 2013 and also the Regulations of Securities and Exchange Board of India (Listing obligations and Disclosure Requirements) Regulation, 2015, a comprehensive exercise for evaluation of the performances of every individual director, of the Board as a whole and its Committees and of the Chairperson of the Company has been carried by your company.

For the purpose of carrying out performance evaluation exercise, three types of Evaluation forms were devised in which the evaluating director has allotted to the individual Director, the Board as a whole, its Committees and the Chairperson appropriate rating on the scale of five.

Such evaluation exercise has been carried out:

- i. of Independent Directors by the Board;
- ii. of Non-Independent Directors by all the Independent Directors in separate meeting held for the purpose;
- iii. of the Board as a whole;
- iv. of the Committees;
- v. of the Chairperson of your Company by the Independent Directors in separate meeting after taking into account the views of the Executive/ Non-Executives Directors;
- vi. Managing Director and Chairman of the Company.

Having regard to the industry, size and nature of business your company is engaged and the evaluation methodology adopted is in the opinion of the Board, sufficient, appropriate and is found to be serving the purpose.

The Independent Directors of the Company are evaluated by the Non-Executive Directors and the other Directors of the Board. The criteria for the evaluation of the Independent Directors are:

- a. Attendance record;
- b. Possesses sufficient skills, experience and level of preparedness which allows the person to clearly add value to discussions and decisions;
- c. Able to challenge views of others in a constructive manner;
- d. Knowledge acquired with regard to the company's business/activities;
- e. Understanding of industry and global trends;
- f. Any qualitative comments and suggestions for improving effectiveness.

### **III. STAKEHOLDERS' RELATIONSHIP COMMITTEE / SHAREHOLDERS' GRIEVANCE COMMITTEE MEETING:**

The Committee has the mandate to review, redress shareholders' grievances and to approve all share transfers.

#### **i. Size and Composition:-**

The Company had duly constituted Stakeholders Relationship Committee/ Shareholders Grievance Committee w.e.f., 1<sup>st</sup> April, 2017 to specifically look into the redressal of the shareholder's grievances and also the share transfers and other investor related matters.

The composition of the Stakeholders Relationship Committee/ Shareholders Grievance Committee as on 31.03.2024 is as under:-

<b>Sr. No.</b>	<b>Name of the Director</b>	<b>Category</b>
1	Mr. Ashwin Jain	Executive Director- Member
2	Mr. Vikas Mapara*	Executive Director- Member
3	Mr. Bhavya Sundesha	Non-Executive Independent Director, Chairperson
4	Mr Jatin Jain	Executive Director- Member

Mrs. Priya Niraj Dhanuka is the Company Secretary & Compliance Officer of the Board Meetings and the Stakeholder and Relationship Committee.

During the year, Mr. Vikas Mapara, Executive Director resigned from the Directorship of the Company (Resigned on March 27, 2024). Further Mr. Jatin Jain was appointed as Additional Managing Director in the Company w.e.f. 27th March, 2024.

**ii. Meeting of the Stakeholder's Relationship Committee / Shareholders' Grievance Committee Meetings:-**

During the financial year 2023 - 2024, 2 (Two) Meetings of the Stakeholder's Relationship Committee / Shareholders' Grievance was held on 30<sup>th</sup> August, 2023 and 31<sup>st</sup> August, 2023.

**iii. The functions of the Stakeholder's Relationship Committee / Shareholders' Grievance Committee Meetings include the following:-**

1. Transfer /Transmission of shares;
2. Issue of duplicate share certificates;
3. Review of shares dematerialized and all other related matters;
4. Monitors expeditious redressal of investor's grievances;
5. Non-receipt of Annual report and declared dividend,
6. All other matters related to shares.

**iv. Investor Grievance Redressal:**

Number of complaints received and resolved to the satisfaction of investors during the year under review and their break-up are asunder:

Type of complaint	No. of complaints
Non-Receipt of Annual Reports	0
Non-Receipt of Dividend Warrants	0
Non-Receipt of Shares lodged for Transfer/Exchange	0
Non-Receipt of Certificates	0
Others (Duplicate/Transmission/Procedure etc.)	0
<b>Total</b>	<b>0</b>



No complaints were received by the Company during the Financial Year ended 31st March, 2024 and there are no complaints pending with the Company as on 31st March, 2024.

No request for share transfers were received during the accounting year ended 31st March, 2024. There were no share transfers pending as on 31st March, 2024, for more than 30 days.

There were no physical transfers of shares during the year under review.

The Stakeholder’s Relationship Committee/Shareholder’s Grievance Committee Meetings attends matters related to Share Transfers, Deletion and Transmission.

**4. REMUNERATION PAID TO THE DIRECTORS OF THE COMPANY:**

During the year, Non-executive and Independent Directors are not paid any remuneration. No sitting fees are paid for attending Board Meetings/Audit Committee Meetings/ Nomination and Remuneration Committee Meetings. No Sitting fees are paid for the Stakeholders Relationship Committee/ Shareholders’ Grievance Committee Meetings.

Details of remuneration paid to Directors during the financial year ended 31.03.2024 is as under:

(Amount in Rs)						
Name of the Director	Salary and Commission	Contribution to P.F. Gratuity and Superannuation Fund	Perquisites	Performance Pay	Sitting Fees	Total
Mr. Vikas Mapara(Resigned w.e.f. 27.03.2024)	-	-	-	-	-	-
Mr. Ashwin Jain	-	-	-	-	-	-
Ms. Renu Jain	-	-	-	-	-	-
Mr Ritesh Chopra	-	-	-	-	-	-
Mr. Bhavya Sundesha	-	-	-	-	-	-

Mr Jatin Jain*	73,925/-	-	-	-	-	73,925/-
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\*Mr. Jatin Jain was appointed as Managing Director w.e.f from March 27 2024.

**5. CORPORATE SOCIAL RESPONSIBILITY COMMITTEE:**

The main purpose of the CSR Committee is to formulate and recommend to the Board a CSR Policy which shall indicate the activities to be undertaken by company as specified in Schedule VII of the Companies Act, 2013 and amount of expenditure to be incurred on the activities suggested as per CSR Policy. The CSR committee Meeting was held on 30<sup>th</sup> May 2023.

**i. Composition of the Corporate Social Responsibility Committee: -**

The composition of the Corporate Social Responsibility Committee as at 31.03.2024 are as under:

Sr. No.	Name of the Director	Category
1	Mr. Bhavya Sundesha	Non-Executive Independent Director, Chairperson
2	Ms. Renu Jain	Non-Executive Independent Director
3	Mr. Jatin Jain	Executive Director

During the year, Mr. Vikas Mapara, Executive Director resigned from the Directorship of the Company (Resigned on March 27, 2024). Further Mr. Jatin Jain was appointed as Additional Managing Director in the Company w.e.f. 27th March, 2024.

**ii. Role/Responsibility of CSR Committee include:**

1. Formulate and recommend to the Board, a CSR policy indicating the activity or activities to be undertaken by the Company as specified in Schedule VII to the Act and have oversight over its implementation;
2. Recommend the amount to be spent on CSR activities referred in clause (1);
3. Ensure that in each financial year Company spends at least 2% of average net profit (if company falls under criteria which is specified under section 135 of the Companies Act,2013) made during the three immediately preceding financial year and if not spent during the year then same should be reported in Directors Report along with reason for not spending the amount;

4. Monitor the CSR policy of the company from time to time;
5. Institute a transparent monitoring mechanism for implementation of the CSR projects and programme;
6. Monitor the Company’s CSR activity on quarterly basis.

**6. GENERAL BODY MEETING:**

**a. The particulars of the last three Annual General Meetings are as under:**

Financial Year	Day and Date of the Annual General Meeting	Location of the Annual General Meeting	Time of the Annual General Meeting	Special /Ordinary resolution passed
2020-21	Thursday, 30 <sup>th</sup> September, 2021	801-802, Dalamal Towers, Nariman Point, Mumbai - 400 021	12:30 P.M.	<ol style="list-style-type: none"> <li>1. To receive, consider and adopt the Audited Profit and Loss Account for the year ended 31<sup>st</sup> March, 2021 and the Balance Sheet as on that date and the reports of the Directors and Auditors thereon.</li> <li>2. To appoint a Director in place of Mr. Vikas Mapara (DIN: 00211580), who retires by rotation and being eligible, offers himself for re appointment. To consider and if thought fit, to pass with or without modification(s)</li> <li>3 Approved Related Party Transaction Entered by</li> </ol>

				Company with M/S. Visual Percept Solar Projects Private Limited for giving its office space on commercial use
2021-22	Thursday, 22 <sup>nd</sup> September, 2022	801-802, Dalamal Towers, Nariman Point, Mumbai - 400 021	12:30 P.M.	<ol style="list-style-type: none"> <li>1. To receive, consider and adopt the Audited Profit and Loss Account for the year ended 31<sup>st</sup> March, 2022 and the Balance Sheet as on that date and the reports of the Directors and Auditors thereon.</li> <li>2. To appoint a Director in place of Mr. Ashwin Jain (DIN: 00173983), who retires by rotation and being eligible, offers himself for re-appointment.</li> <li>3. To re-appoint M/s. Kamdar Dalal &amp; Associates, having Firm Registration no. (129596W) Chartered Accountants, as a Statutory Auditors of the Company.</li> <li>4. To re-appoint Mr. Vikas Harilal</li> </ol>

				<p>Mapara (DIN: 00211580), as a Managing Director of the Company for a period of five years.</p> <p>5. To regularize the appointment of Mr. Bhavya Dilip Sundesha (DIN: 09651332), as an Independent Director of the Company.</p>
2022-23	Saturday, 30 <sup>th</sup> September, 2023	801-802, Dalamal Towers, Nariman Point, Mumbai - 400 021	11.00 A.M.	<p>1. To receive, consider and adopt the Audited Profit and Loss Account for the year ended 31<sup>st</sup> March, 2023 and the Balance Sheet as on that date and the reports of the Directors and Auditors thereon.</p> <p>2. To appoint a Director in place of Mr. Ashwin Jain (DIN: 00173983), who retires by rotation and being eligible, offers himself for re-appointment.</p> <p>3. To re-appoint</p>

				<p>Mr. Ritesh Chopra (DIN: 08194656), as an Independent Director of the Company for a second term of 5(Five) consecutive years.</p> <p>4. To re-appoint Mr. Renu Jain (DIN: 08069474), as an Independent Director of the Company for a second term of 5(Five) consecutive years.</p>
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**b. Details of the Special Resolution passed through Postal Ballot:**

During the year under review There was one Postal Ballot by the Company during FY 23-24. All the resolutions were passed with requisite majority of Votes. Details of the resolutions passed through postal ballot during FY 2023-24 are given below.

Description of Resolution	Postal Ballot Notice date	Date of Publication of Voting results	Voting Pattern	
			Votes in Favour	Votes against
Alteration of Object Clause of the Memorandum of Association pursuant to addition made to Main Object Clause.			1, 72, 050	0
Alteration of Capital Clause of the Memorandum of Association pursuant to increase in	October 26, 2023	December 01 2023	1, 72, 050	0

Authorised Share Capital of the Company.				
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**7. DISCLOSURE:**

- During the year under review, there are no materially significant related party transactions of the Company which have potential conduct with the interests of the Company at large. The details of the related party transaction at arm's length basis have been provided by the company in format AOC -2.
- The Company has complied with the requirements of the Bombay Stock Exchange (BSE), the Securities and Exchange Board of India (SEBI) and Statutory Authorities on all matters related to Capital Markets.
- The Company has adopted a Whistle Blower Policy/Vigil Mechanism and has established the necessary mechanism for employees to report concerns about unethical behavior.
- web link where policy on dealing with related party transactions;  
<http://www.shreenathinvestment.in/>
- During the year the following amounts were transferred to the Investors Education and Protection Fund:

<b>Particulars</b>	<b>Date of Transfer</b>	<b>Amount (INR)</b>
Matured Deposits	NIL	NIL
Interest on Matured Deposits	NIL	NIL
Unpaid Dividend	NIL	NIL

**8. MEANS OF COMMUNICATION:**

- The quarterly, half yearly and annual results are communicated to all the members of the Company by publishing in English and Marathi National dailies namely Free Press Journal and Navshakti respectively. The Financial Statements are also displayed on the website of the Company [www.shreenathinvestment.in](http://www.shreenathinvestment.in)
- The Management Discussion and Analysis Report forms a part of this Annual report, which is sent to each member by post, courier or email.
- The Company informs the Stock Exchange all price sensitive matters or such other matters which are material and of relevance to the shareholders.

**9. GENERAL SHAREHOLDERS INFORMATION:**

**I. Details of the Annual General Meeting for the financial year 2022-23:**

Date: 30<sup>th</sup> September 2023

Day: Saturday

Time: 11:00 A.M.

Venue: 801-802, Dalamal Towers, Nariman Point, Mumbai – 400 021.

**II. Financial Calendar 2024-25:**

<b>Name of the Quarter/ Half year</b>	<b>Due date for the compliance</b>
Quarter ending 30.06.2024	On or before 14.08.2024
Quarter/Half year ending 30.09.2024	On or before 14.11.2024
Quarter ending 31.12.2024	On or before 14.02.2024
Quarter/Year ending 31.03.2025	On or before 30.05.2025

**III. Dividend:**

Company recommends Nil dividend.

Date of Book Closure: 17<sup>th</sup> September to 26<sup>th</sup> September 2024 (both days inclusive).

**IV. Details of the Stock Exchange in which the Company is listed:**

- Name of the Stock exchange: The Bombay Stock Exchange Limited
- Listing fee for the year 2023-24 has been paid to the Stock Exchange.
- Stock Code- Physical :503696 on The Bombay Stock Exchange Limited
- ISIN No. NSDL &CDSL : INE475V01012
- Market Price Data : High / Low price during each Month of 2023-24 on The Bombay Stock Exchange Limited and BSE Sensex –

**NOTE: COMPANY HAS RECEIVED IN-PRINCIPAL APPROVAL FROM**



BSE ON 29<sup>TH</sup> DECEMBER 2017 PERTAINING TO REVOCATION OF SUSPENSION IN TRADING OF EQUITY SHARES OF THE COMPANY. HOWEVER, THERE WAS NO TRADING COMMENCED AFTER GETTING APPROVAL FROM BSE. THEREFORE, COMPARISON WITH BSE SENSEX IS NOT APPLICABLE TO OUR COMPANY.

**V. Share Transfer System and other related matters:**

- Registrar and Share Transfer Agent:

**KFin Technologies Limited**

**Corporate Office Address:** Selenium, Tower B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032 IN.

**Contact Details:** Tel No: P: +91 40 67161659

Email: umesh.pandey@kfintech.com

Email: compliance.corp@kfintech.com

**Website:** www.kfintech.com

- Share Transfer System:

The shares lodged for transfer are processed by the Registrar and Share Transfer Agent and are approved by Stakeholder's Relationship Committee/Shareholders' Grievance Committee. Shares sent for transfer in physical form are registered and returned within a period of 15 days from the date of receipt, subject to documents being valid and complete in all respects. Similarly, all requests for demat are received and processed by the Registrar and Transfer Agent and confirmations given to the depositories within the prescribed time limit.

- Nomination Facility for Shareholding:

As per the provisions of the Companies Act, 2013, facility for making nominations is available for shareholders, in respect of the shares held by them. Nomination forms can be obtained from the Registrar and Share Transfer agent of the Company.

- Payment of Dividend through Electronic Clearing Service:

The Securities and Exchange Board of India has made it mandatory for all companies to use the bank account details furnished by the depositories for

depositing dividend through Electronic Clearing Service (ECS) to investors wherever ECS and bank details are available. In the absence of ECS facilities, the Company will print the bank account details, if available, on the payment instrument for distribution of dividend.

- **Unclaimed Dividends:**

Members wishing to claim dividends, which remain unclaimed, are requested to correspond to the Company’s registered office. Members are requested to note that dividends not encashed or claimed within seven years from the date of transfer to the Company’s Unpaid Dividend Account, will as per sections 205A and 205C of the Companies, Act, 1956 and Section 123 & other applicable provisions of the Companies Act, 2013, read with the relevant rules, be transferred to the Investor Education and Protection Fund.

- **Correspondence regarding Change in Address:**

Members are requested to address all correspondences, including dividend matters, to the Registrar and Share Transfer Agents, **KFin Technologies Limited**

**Corporate Office Address:** Selenium, Tower B, Plot No- 31 & 32, Financial District, Nanakramguda, Serilingampally Hyderabad Rangareddi TG 500032 IN.

**Contact Details:** Tel No: P: +91 40 67161659

Email: umesh.pandey@kfintech.com

Email: compliance.corp@kfintech.com

**Website:** [www.kfintech.com](http://www.kfintech.com)

**Distribution of Shareholding as on 31.03.2024:**

Sr. No	Category	No. of Shareholders	% of Shareholders	No of Shares	Shareholding Amount	% of Amount
1	1-5000	54	77.14	48800	488000.00	19.52
2	5001- 10000	1	1.43	9750	97500.00	3.9
3	10001- 20000	12	17.39	136750	1367500.00	54.7
4	20001- 30000	1	0.014	24000	240000	9.6
5	30001- 40000	1	1.43	30700	307000.00	12.28
6	40001- 50000	0	0	0	0	0
7	50001- 100000	0	0	0	0	0
8	100001& Above	0	0	0	0	0

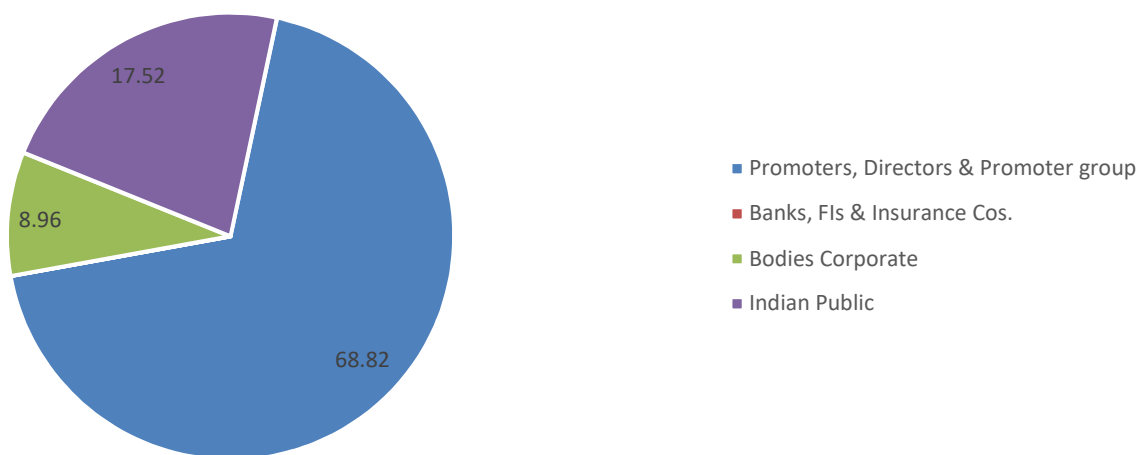
<b>Total:</b>	<b>69</b>	<b>100.00</b>	<b>250000</b>	<b>2500000.00</b>	<b>100.00</b>
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**Shareholding Pattern as on 31.03.2024:**

Category	No. of shares held	Percentage to total (%)
a. Promoters, Directors & Promoter group	172050	68.82%
b. Banks, FIs & Insurance Cos.	0	0
c. Bodies Corporate	34150	8.96%
d. Indian Public	43800	17.52%
<b>Total</b>	<b>250000</b>	<b>100.00</b>

**SHAREHOLDING PATTERN AS ON 31.03.2024**

**Percentage to total (100%)**



- Dematerialization of Shares: The shares of the Company can be held and traded in electronic form.

90.96% (227400 shares) of the Company's shares have been dematerialized as on 31.03.2024.

- Outstanding ADRs/GDRs: Nil/Warrants or any Convertible Instrument, conversion date and likely impact on equity.
  
- Plant location: Not Applicable.
- Address of the Company: Shreenath Investment Company Limited  
801-802, Dalamal Towers, Nariman Point,  
Mumbai - 400 021  
Tel: 022- 6638 1800  
Fax: 022-6638 1818  
Email:sicl2889@gmail.com  
Website: [www.shreenathinvestment.in](http://www.shreenathinvestment.in)

#### **10. CODE OF CONDUCT:**

The Board of Directors has adopted the Code of Business Conduct and Ethics for Directors and Senior Management. The Code is reviewed from time to time by the Board. The said Code has been communicated to the Directors and the Members of the Senior Management. The Code has also been posted on the Company's website [www.shreenathinvestment.in](http://www.shreenathinvestment.in)

#### **11. CEO/CFO CERTIFICATE:**

The Managing Director and the Chief Financial Officer of the Company gives Annual Certification on financial reporting and Internal Controls to the Board in terms of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Managing Director and the Chief Financial Officer also gives quarterly certification on financial results before the Board in terms of Regulation 33(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (As annexed in Annexure I).

#### **12. DISCLOSURES REGARDING APPOINTMENT OR RE-APPOINTMENT OF DIRECTORS AS REQUIRED UNDER SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015:**

1. In accordance with the provisions of Section 152 of the Companies Act, 2013, one-third of the total number of Directors for the time being is liable to retire by rotation. Accordingly, one Director of the Company viz. Mr. Ashwin Jain (DIN: 00173983) will be retiring by rotation at the ensuing Annual General Meeting of the Company. Mr. Ashwin Jain (DIN: 00173983), being eligible, offers himself for re-appointment.

Mr. Ashwin Jain (DIN: 00173983) has been actively associated with Investment Companies. Mr. Ashwin Jain (DIN: 00173983) became the Director of M/s. Shreenath Investment Company Limited dated 31.03.2002 and has been participating in making various policies and regulation of M/s. Shreenath Investment Company Limited. He has gained experience and vast knowledge in the fields of administration, legal affairs, taxation, accounting and finance.

He holds a Post Graduate Qualification in Financial Management.

- a. Disclosure of relationship between directors interse:

There is no relationship between Mr. Ashwin Jain and any other Directors of the Company.

- b. Name of Listed Company in which Mr. Ashwin Jain holds Directorship and Membership of the Committees of the Board:- **NIL**

Name of the listed entities in which Director holds Directorship-**NIL**

Name of the listed entities in which Director holds Chairmanship in the Committee-**NIL**

Name of the listed entities in which Director holds Membership in Committee-**NIL**

- c. Shareholding in the Company - **NIL**

### **13. CERTIFICATION ON CORPORATE GOVERNANCE COMPLIANCES:**

As required under the Regulations of SEBI (Listings Obligations and Disclosure Requirements) Regulations, 2015, certificate of compliances of Corporate Governance issued by M/s. Pramod S Shah & Associates, Practicing Company Secretaries annexed here as **Annexure II**.

### **14. OTHER DISCLOSURE:**

- a) The Company is fully complied with the applicable regulations and hence

there are no penalties imposed upon the Company by any of the Authority. However, BSE Ltd had suspended the trading in the Company’s shares on account of non-compliance with Listing Agreement. Company had filed application for revocation of suspension with BSE Ltd and made the default good. The Company has paid re-instatement fees of Rs. 32,40,000 dated 3<sup>rd</sup> November, 2017 and submitted all the documents for obtaining In-Principal approval from BSE. Company got the In-principle approval from BSE of revocation of suspension w.e.f 29<sup>th</sup> December, 2017.

- b) The Vigil Mechanism and the Whistle Blower policy are duly established and none of the personnel have been denied to access to the Audit Committee for any of their grievances.
- c) The Material Related Party policy of the Company is hosted on the website of the Company viz. [www.shreenathinvestment.in](http://www.shreenathinvestment.in)
- d) The website of the Company is duly updated as per the Regulation 46 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.
- e) A Certificate from Practicing Company Secretaries that none of the Directors on the Board of the Company have been debarred or disqualified from being appointed or continuing as directors of Companies by SEBI / Ministry of Corporate Affairs or any such statutory authority is enclosed to this report **Annexure III.**
- f) The Company is committed to provide safe and conducive environment to its employees during the year under review. Your Directors further state that during the year under review, there was no case filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- g) The Company has an Internal Complaints Committee (ICC) to redress complaints received regarding sexual harassment. No complaints were received by the ICC in 2023-24.

a. number of complaints filed during the financial year	0
b. number of complaints disposed of during the financial year	0
c. number of complaints pending as on end of the financial year	0

h) All the mandatory requirements are duly complied with.

## **15. INSIDER TRADING REGULATIONS**

The Company has notified and adopted the Revised Code of Conduct to regulate, monitor and report trading by Designated Person and immediate relatives of Designated Person and Code of practices and procedures for fair disclosures of unpublished price sensitive information pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 with a view to regulate trading in securities by the Designated Person and immediate relatives of Designated Person of the Company. The Compliance Officer is responsible with compliance under these Regulations. The code requires pre-clearance for dealing in the Company's securities and prohibits the purchase or sale of Company's securities by the Designated Person and immediate relatives of Designated Person while in possession of unpublished price sensitive information in relation to the Company and during the period when the Trading Window is closed. The Board is responsible for implementation of the Code. Designated Person and immediate relatives of Designated Person have affirmed compliance with the Code. The said Revised Code of Conduct to regulate, monitor and report trading by Designated Person and immediate relatives of Designated Person and Code of practices and procedures for fair disclosures of unpublished price sensitive information is displayed on the website of the Company and weblink of the same is mentioned below:-

[http://www.shreenathinvestment.in/Files/Shree%20Investment%20compan\\_Code%20of%20Practise.pdf](http://www.shreenathinvestment.in/Files/Shree%20Investment%20compan_Code%20of%20Practise.pdf)

**ANNEXURE X****MANAGING DIRECTOR / CHIEF FINANCIAL OFFICER CERTIFICATION**

We, Jatin Jain, Managing Director and Mayur Kadakia, Chief Financial Officer, of **SHREENATH INVESTMENT COMPANY LIMITED**, to the best of our knowledge and belief, certify that:

- A. We have reviewed financial statements and the cash flow statement for the year ended 31.03.2024 and to the best of our knowledge and belief, we state that:
1. these statements do not contain any materially untrue statement or any omitted material fact or contain statements that might be misleading;
  2. these statements together present a true and fair view of the company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.
- B. There are, to the best of our knowledge and belief, no transactions entered into by the Company during the year which are fraudulent, illegal or violative of the company's code of conduct.
- C. We are responsible for establishing and maintaining internal controls for financial reporting and that they have evaluated the effectiveness of internal control systems of the Company pertaining to financial reporting and they have disclosed to the Auditors and the Audit Committee, deficiencies in the design or operation of such internal controls, if any, of which they are aware and the steps they have taken or propose to take to rectify these deficiencies.
- D. We have indicated, based on our most recent evaluation, wherever applicable, to the Auditors and the Audit committee:
1. significant changes, if any, in internal control over financial reporting during the year;
  2. significant changes, if any, in accounting policies during the year and that the same have been disclosed in the notes to the financial statements ; and
  3. Instances of significant fraud of which they have become aware and the



involvement therein, if any, of the management or an employee having a significant role in the company's internal control system over financial reporting.

Yours faithfully  
For Shreenath Investment Company Limited

Sd/-  
Jatin Jain  
Managing Director  
DIN: 08521872

Sd/-  
Mayur Kadakia  
Chief Financial officer

**Date: 29-08-2024**

**Place: Mumbai**

**ANNEXURE XI****CERTIFICATE ON CORPORATE GOVERNANCE**

**Certificate on compliance with the conditions of Corporate Governance as per the provisions of Chapter IV of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

**To**  
**The Members,**  
**Shreenath Investment Company Limited**  
**801-802, Dalamal Tower, Nariman Point, Mumbai 400021.**

We have examined the compliance of conditions of Corporate Governance by Shreenath Investment Company Limited for the financial year ended 31.03.2024 as stipulated in Regulation 17 to 27 and clauses (b) to (i) of sub regulation (2) of regulation 46 and para C, D and E of schedule V of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, of the Company with stock exchanges.

The compliance of conditions of Corporate Governance is the responsibility of the Management. Our examination was limited to procedures and implementation thereof, adopted by the Company for ensuring the compliance of the conditions of Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In our opinion and to the best of our information and according to the explanation given to us, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in the Regulation 17 to 27 and clauses (b) to (i) of sub regulation (2) of regulation 46 and para C, D and E of schedule V of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, of the Company with stock exchanges unless otherwise stated in Corporate Governance Report.

We further state that such compliance is neither an assurance as to the future viability of the Company nor the efficiency or the effectiveness with which the management has conducted the affairs of the Company.

**For Pramod S Shah & Associates**  
Practising Company Secretary

Sd/-  
Pramod S. Shah  
Partner  
Membership No. 334 (FCS)  
COP No: 3804  
**Place: Mumbai**  
UDIN: F000334F001069072

**DECLARATION REGARDING COMPLIANCE OF BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL WITH THE COMPANY'S CODE OF CONDUCT:**

This is to confirm that the Company has adopted a Code of Conduct for the Board of Directors and Senior Management of the Company.

As Managing Director of Shreenath Investment Company Limited and as required by Schedule V (D) of the Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015, I hereby declare that all the Board members and senior management personnel of the Company as identified by the Company considering the requirements in this respect, have affirmed compliance with the Code of Conduct for the financial year 2023-24.

In accordance with Schedule V of the Listing Regulations with the Stock Exchange, I hereby declare that the Directors and Senior Management of the Company have affirmed compliance with the code of conduct as applicable to them for the year ended 31<sup>st</sup> March, 2024.

For Shreenath Investment Company Limited

Sd/-

**Jatin Jain**

**Managing Director**

**DIN: 08521872**

**Date: 29.08.2024**

**Place: Mumbai**

**CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS**

*(Pursuant to Regulation 34(3) and Schedule V Para C Clause (10)(i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

To,

The Members of

**Shreenath Investment Company Limited**

801/802 Dalamal Tower, Nariman Point, Mumbai - 400 021.

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of **Shreenath Investment Company Limited** (hereinafter called "the Company") having CIN: **L67120MH1979PLC022039** and registered office at 801/802 Dalamal Tower, Nariman Point, Mumbai - 400 021, produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal [www.mca.gov.in](http://www.mca.gov.in)) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ending on **31<sup>st</sup> March, 2024** have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs or any such other Statutory Authority

Ensuring the eligibility of for the appointment / continuity of every Director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on our verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

**For Pramod S Shah & Associates  
Practising Company Secretaries**

Sd/-

Pramod S. Shah

**Partner**

Membership No.: 334 (FCS)

CP No: 3804

UDIN: F000334F001068973

**Date: 29.08.2024**

**Place: Mumbai**


**SHREENATH INVESTMENT COMPANY LIMITED**  
**CIN : L67120MH1979PLC022039**  
**BALANCE SHEET AS ON MARCH 31, 2024**  
All amounts are in INR Lakhs, unless otherwise stated

Particulars	Note No.	As at March 31, 2024	As at March 31, 2023
<b>ASSETS</b>			
<b>(1) Non-Current Assets</b>			
(a) Property, Plant and Equipment	4	4.65	4.86
(b) Financial Assets			
(i) Investments	5.1	26,967.06	19,298.60
(ii) Other Non-Current Assets	5.2	6.05	6.05
<b>Total Non-Current Assets</b>		<b>26,977.76</b>	<b>19,309.51</b>
<b>(2) Current Assets</b>			
(a) Financial Assets			
(i) Investments	6	4,219.90	1,510.04
(ii) Cash and Cash Equivalents	7	12.85	1.17
(iii) Loans and Advances	8	2,542.00	-
(b) Current Tax Assets (Net)	9	1.14	3.08
(c) Other Current Assets	10	6.26	0.13
<b>Total Current Assets</b>		<b>6,782.15</b>	<b>1,514.42</b>
<b>Total Assets</b>		<b>33,759.91</b>	<b>20,823.93</b>
<b>EQUITY &amp; LIABILITIES</b>			
<b>(1) Equity</b>			
(a) Equity Share Capital	11	25.00	25.00
(b) Other Equity	12	30,741.83	18,747.07
<b>Total Equity</b>		<b>30,766.83</b>	<b>18,772.07</b>
<b>(2) Liabilities</b>			
<b>Non-Current Liabilities</b>			
(a) Deferred Tax Liabilities (Net)	13	2,959.52	2,050.34
<b>Total Non-Current Liabilities</b>		<b>2,959.52</b>	<b>2,050.34</b>
<b>Current Liabilities</b>			
(a) Financial Liabilities			
(i) Other Financial Liabilities	14	1.24	1.44
(b) Other Current Liabilities	15	0.63	0.08
(c) Current Tax Liabilities (Net)	16	31.69	-
<b>Total Current Liabilities</b>		<b>33.56</b>	<b>1.52</b>
<b>Total Equity and Liabilities</b>		<b>33,759.91</b>	<b>20,823.93</b>

Significant accounting policies and notes to the Ind AS financial statements (Note No.3)  
The explanatory notes referred to above form an integral part of the Ind AS financial statements

As per our report of even date

**FOR KAMDAR DALAL & ASSOCIATES**  
FIRM REGISTRATION NO. : 129596W  
CHARTERED ACCOUNTANTS

  
**S.K.KAMDAR**  
PARTNER  
MEMBERSHIP NO. : 032878



For and on behalf of the Board of Directors  
**SHREENATH INVESTMENT COMPANY LIMITED**

  
**JATIN JAIN**  
MANAGING DIRECTOR  
DIN: 08521872

  
**PRIYA DHANUKA**  
COMPANY SECRETARY  
Membership No. A34564

  
**ASHWIN JAIN**  
DIRECTOR  
DIN: 00173983

  
**MAYUR KADAKIA**  
CHIEF FINANCIAL OFFICER

Mumbai : Dated 23/05/2024

**SHREENATH INVESTMENT COMPANY LIMITED**  
**CIN : L67120MH1979PLC022039**  
**Statement of Profit and Loss for the year ended March 31, 2024**  
All amounts are in INR Lakhs, unless otherwise stated

Particulars	Note No.	Year Ended March 31, 2024	Year Ended March 31, 2023
Revenue from Operations	17	5,889.82	-
Other Income	18	412.72	187.44
<b>Total Income</b>		<b>6,302.54</b>	<b>187.44</b>
<b>Expenses</b>			
Purchases of stock-in-trade		5,874.69	-
Employee Benefit Expenses	19	4.68	3.00
Finance Cost		-	1.50
Depreciation & Amortization	20	0.21	0.28
Other Expenses	21	59.75	24.47
<b>Total Expenses</b>		<b>5,939.33</b>	<b>29.25</b>
<b>Profit Before Tax</b>		<b>363.21</b>	<b>158.19</b>
<b>Tax Expenses</b>			
- Current Tax		86.85	58.51
- Deferred Tax		8.47	(3.41)
<b>Total Tax Expenses</b>	22.1	<b>95.32</b>	<b>55.10</b>
<b>Net Profit For The Year</b>		<b>267.89</b>	<b>103.09</b>
<b>Other Comprehensive Income</b>			
<b>A. Items that will not be reclassified to Profit or Loss</b>			
Fair value gain on Equity Investment		13,241.52	6,739.54
Income Tax relating to these items	22.2	(1,514.65)	(1,140.62)
<b>Other Comprehensive Income for the year, Net of Tax</b>		<b>11,726.87</b>	<b>5,598.92</b>
<b>Total Comprehensive Income for the period</b>		<b>11,994.76</b>	<b>5,702.01</b>
<b>Earnings per equity share</b>	23		
Earnings per equity share [nominal value of share Rs. 10/-]			
Basic and Diluted		107.15	41.24

Significant accounting policies and notes to the Ind AS financial statements (Note No.3)

The explanatory notes referred to above form an integral part of the Ind AS financial statements

As per our report of even date

**FOR KAMDAR DALAL & ASSOCIATES**  
FIRM REGISTRATION NO. : 129596W  
CHARTERED ACCOUNTANTS




**S.K.KAMDAR**  
PARTNER  
MEMBERSHIP NO. : 032878



For and on behalf of the Board of Directors  
**SHREENATH INVESTMENT COMPANY LIMITED**

  
**JATIN JAIN**  
MANAGING DIRECTOR  
DIN: 08521872

  
**ASHWIN JAIN**  
DIRECTOR  
DIN: 00173983

  
**PRIYA DHANUKA**  
COMPANY SECRETARY  
Membership No. A34564

  
**MAYUR KADAKIA**  
CHIEF FINANCIAL OFFICER

Mumbai : Dated 23/05/2024





**SHREENATH INVESTMENT COMPANY LIMITED**  
**CIN : L67120MH1979PLC022039**  
**Statement of Cash Flows for the year ended March 31, 2024**  
All amounts are in INR Lakhs, unless otherwise stated

	Year Ended March 31, 2024	Year Ended March 31, 2023
<b>Cash flows from Operating Activities</b>		
Profit Before Tax	363.21	158.19
<b>Adjustments:</b>		
Depreciation And Amortisation	0.21	0.28
Property, Plant And Equipment Written-Off	-	0.63
Interest Income	(71.93)	-
Profit On Sale Of Current Investments	(230.64)	(133.44)
Dividend Income	(76.23)	(103.82)
Finance Cost	-	(1.50)
(Gains)/Loss On Fair Value Changes On Financial Instruments Through Profit Or Loss	(33.92)	57.37
<b>Operating Cash Flows Before Working Capital Changes And Other Assets</b>	<b>(49.30)</b>	<b>(22.29)</b>
Increase In Other Current Assets	(6.13)	(0.13)
(Decrease)/Increase In Other Financial Liabilities	(0.20)	0.23
Increase in Other Current Liabilities	0.55	0.02
Cash Generated From Operations	<b>(55.08)</b>	<b>(22.17)</b>
Income Taxes Paid	(667.17)	(60.36)
<b>Net Cash Generated From Operating Activities</b>	<b>(722.25)</b>	<b>(82.53)</b>
<b>Cash Flows From Investing Activities</b>		
Profit On Sale Of Current Investments	230.64	133.44
Purchase Of Current Investment - Net	(2,675.93)	(155.62)
Sale Of Non Current Investment -Net	5,573.06	-
Dividend Income Received	76.23	103.82
<b>Net Cash Generated from Investing Activities</b>	<b>3,204.00</b>	<b>81.64</b>
<b>Cash Flows From Financing Activities</b>		
Inter Corporate Loan	(2,542.00)	-
Interest Income	71.93	-
Finance Cost	-	1.50
<b>Net Cash used in Financing Activities</b>	<b>(2,470.07)</b>	<b>1.50</b>
Net Increase in Cash and Cash Equivalents	11.68	0.61
Cash and Cash Equivalents at the beginning of the period	1.17	0.56
<b>Cash and Cash Equivalents at the end of the period (refer Note 7)</b>	<b>12.85</b>	<b>1.17</b>

**Notes:**

The above Cash flow statement has been prepared under the "Indirect Method" as set out in Indian Accounting Standard-7, "Statement of Cash Flows".

As per our report of even date

**FOR KAMDAR DALAL & ASSOCIATES**  
FIRM REGISTRATION NO. : 129596W  
CHARTERED ACCOUNTANTS

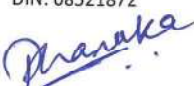


**S.K.KAMDAR**  
PARTNER  
MEMBERSHIP NO. : 032878



For and on behalf of the Board of Directors  
**SHREENATH INVESTMENT COMPANY LIMITED**

  
**JATIN JAIN**  
MANAGING DIRECTOR  
DIN: 08521872

  
**PRIYA DHANUKA**  
COMPANY SECRETARY  
Membership No. A34564

  
**ASHWIN JAIN**  
DIRECTOR  
DIN: 00173983

  
**MAYUR KADAKIA**  
CHIEF FINANCIAL OFFICER

Mumbai : Dated 23/05/2024



SHREENATH INVESTMENT COMPANY LIMITED

Statement of change In Equity for the year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

A Equity Share Capital

Particulars	As at March 31, 2024		As at March 31, 2023	
	Number of Shares	Amount	Number of Shares	Amount
Issued, subscribed and paid-up share capital				
Equity shares of INR 10 each				
Opening Balance	2,50,000	25.00	2,50,000	25.00
Changes in equity share capital during the year	-	-	-	-
<b>Closing Balance</b>	<b>2,50,000</b>	<b>25.00</b>	<b>2,50,000</b>	<b>25.00</b>

B Other Equity

Particulars	Retained Earnings	Capital Reserve	Other Comprehensive Income	Total
<b>As at April 01, 2022</b>	<b>2,803.43</b>	<b>8.66</b>	<b>10,232.97</b>	<b>13,045.06</b>
Adjustment on realisation of Investments during the year	-	-	-	-
Profit for the year	103.09	-	-	103.09
Other Comprehensive Income	-	-	5,598.92	5,598.92
<b>Balance as at March 31, 2023</b>	<b>2,906.52</b>	<b>8.66</b>	<b>15,831.89</b>	<b>18,747.07</b>
Adjustment on realisation of Investments during the year	4,754.10	-	(4,754.10)	-
Profit for the year	267.89	-	-	267.89
Other Comprehensive Income	-	-	11,726.87	11,726.87
<b>Balance as at March 31, 2024</b>	<b>7,928.51</b>	<b>8.66</b>	<b>22,804.66</b>	<b>30,741.83</b>

As per our report of even date

FOR KAMDAR DALAL & ASSOCIATES  
FIRM REGISTRATION NO. : 129596W  
CHARTERED ACCOUNTANTS

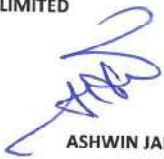
  
S.K.KAMDAR  
PARTNER  
MEMBERSHIP NO. : 032878



For and on behalf of the Board of Directors

SHREENATH INVESTMENT COMPANY LIMITED

  
JATIN JAIN  
MANAGING DIRECTOR  
DIN: 08521872

  
ASHWIN JAIN  
DIRECTOR  
DIN: 00173983

  
PRIYA DHANUKA  
COMPANY SECRETARY  
Membership No. A34564

  
MAYUR KADAKIA  
CHIEF FINANCIAL OFFICER

Mumbai : Dated 23/05/2024





## Shreenath Investment Company Limited

Notes forming part of the financial statements for year ended March 31, 2024

### 1. Corporate Information

Shreenath Investment Company Limited (the Company) is a Public Limited Company (Category - Limited by shares and sub-category - Non-Government Company) domiciled in India and is incorporated under the provisions of the Companies Act, 1956 on 26/12/1979. The Corporate Identification Number (CIN) is L67120MH1979PLC022039. The Company has commenced commodity trading during the financial year 2023-24. The Company operates in India.

### 2. Basis of preparation

#### 2.1 Statement of compliance responsibility statement

The financial statements are prepared and comply in all material aspects with the Indian Accounting Standards (Ind AS) notified under Section 133 of the Companies Act 2013 ("the Act") read with Rule 3 of the Companies (Indian Accounting Standard) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rule, 2016 and other relevant provisions of the Act.

Details of the accounting policies of the Company are included in Note 3.

#### 2.2 Functional and presentation currency

The Financial statements are prepared in Indian Rupees (INR), which is also the Company's functional currency. These financial statements are presented in Indian Rupees (rounded off to nearest lakhs, unless otherwise stated).

#### 2.3 Basis of measurement

The financial statements have been prepared and presented under the historical cost convention on the accrual basis of accounting except certain financial assets and liabilities that are measured at fair value.

#### 2.4 Use of judgments, estimates and assumptions

In preparing these financial statements, Management has made judgements, estimates and assumptions that affect the accounting policies and the reported amounts of revenues, expenses, assets and liabilities. Actual results may differ from these estimates. Estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognised prospectively in current and future periods.

#### *Estimates*

The key assumptions concerning the future and other key sources of estimation uncertainty at the reporting date, that have a significant risk of causing material adjustments to the carrying amounts of assets and liabilities within the next financial year are discussed below:

#### *a) Useful lives of property, plant and equipment assets*

The charge in respect of periodic depreciation is derived after estimating the assets expected useful life and the expected residual value at the end of its life. The depreciation method, useful lives and residual values of Company's assets are estimated by Management at the time the asset is acquired and reviewed during each financial year.



**b) Valuation of deferred tax assets**

The Company reviews the carrying amount of deferred tax assets at the end of each reporting period. The policy for the same has been explained under Note 3.1(h)

**c) Provisions and contingent liabilities**

A provision is recognised when the Company has a present obligation as a result of past event and it is probable that an outflow of resources will be required to settle the obligation, in respect of which a reliable estimate can be made. Provisions are not discounted to its present value and are determined based on best estimate required to settle the obligation at the balance sheet date. These are reviewed at each balance sheet date adjusted to reflect the current best estimates. Contingent liabilities are not recognised in the financial statements. A contingent asset is neither recognised nor disclosed in the financial statements.

**d) Taxes**

Significant judgements are involved in determining the provision for income taxes and deferred taxes including the amount expected to be paid or involved expected to be paid or recovered in connection with uncertain tax positions.

**e) Financial assets and financial liabilities**

When the fair value of financial assets and financial liabilities recorded in the balance sheet cannot be derived from active markets, their fair value is determined using valuation techniques including the discounted cash flow model. The inputs to these models are taken from observable markets where possible, but where this is not feasible, a degree of judgments is required in establishing fair values. The judgments include considerations of inputs such as liquidity risk, credit risk and volatility. Changes in assumptions about these factors could affect the reported fair value of financial instruments.

**3.1 Summary of significant accounting policies**

- a. Cash and cash equivalents** Cash comprises cash on hand and demand deposits with banks. Cash equivalents are short-term balances (with an original maturity of three months or less from the date of acquisition), highly liquid investments that are readily convertible into known amounts of cash and which are subject to insignificant risk of changes in value.

**b. Current-non-current classification**

All assets and liabilities are classified into current and non-current.

**Assets**

An asset is classified as current when it satisfies any of the following criteria:

- it is expected to be realised in, or is intended for sale or consumption in the Company's normal operating cycle;
- it is held primarily for the purpose of being traded;
- it is expected to be realised within 12 months after the reporting date; or
- it is cash or cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least 12 months after the reporting date.

Current assets include the current portion of non-current financial assets. All other assets are classified as non-current.





**Liabilities**

A liability is classified as current when it satisfies any of the following criteria:

- a. it is expected to be settled in the Company's normal operating cycle;
- b. it is held primarily for the purpose of being traded;
- c. it is due to be settled within 12 months after the reporting date; or
- d. the company does not have an unconditional right to defer settlement of the liability for at least 12 months after the reporting date.

Current liabilities include current portion of non-current financial liabilities.

Deferred tax assets are classified as non-current assets.

Operating cycle is the time between the acquisition of assets for processing and their realisation in cash and cash equivalents.

**c. Foreign exchange transactions**

Foreign currency transactions, if any, are recorded at the rates of exchange prevailing on the dates of the respective transaction. Exchange differences arising on foreign exchange transactions settled during the year are recognised in the statement of profit and loss.

Monetary assets and liabilities denominated in foreign currencies, if any, as at the balance sheet date are translated at the closing exchange rates on that date, the resultant exchange differences are recognised in the statement of profit and loss.

**d. Property, plant and equipment**

Property, plant and equipment (PPE) are measured at cost, net of accumulated depreciation and/or accumulated impairment losses, if any. The cost of PPE includes freight, duties, taxes and other incidental expenses related to the acquisition or construction of those PPE. Likewise, when a major inspection is performed, its costs are recognised in the carrying amount of the plant and equipment as a replacement if the recognition criteria are satisfied.

If significant parts of an item of property, plant and equipment have different useful lives, then they are accounted for as separate items (major components) of property, plant and equipment.

An item of property, plant and equipment is derecognized upon disposal or when no future economic benefits are expected from its use or disposal. Any gain or loss arising on de-recognition of the asset (calculated as the difference between the net disposal proceeds and the carrying amount of the asset) is included in statement of profit or loss in the year the asset is derecognized.

**Subsequent measurement**

Subsequent expenditure is capitalised only if it is probable that the future economic benefits associated with the expenditure will flow to the Company. All other repairs and maintenance costs are recognised in statement of profit and loss as incurred.

**Depreciation**

Depreciation is provided on the written down value method over the estimated useful life of the assets, which are equal/lower than the rates prescribed under Schedule II of the Companies Act,



2013. In order to reflect the actual usage of assets, the estimated useful lives of the assets is based on a technical evaluation.

<b>Asset category</b>	<b>Estimated useful life (Years)</b>
Buildings	60 years
Furniture and Fixtures	10 years
Office equipment	5 years

Depreciation is charged on a proportionate basis for all assets purchased and sold during the year.

The residual values, useful lives and methods of depreciation of property, plant and equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

Advances paid towards the acquisition of property, plant and equipment outstanding at each balance sheet date are shown as capital advances under long-term loans and advances and the cost of property, plant and equipment not ready for their intended use before such date are disclosed under capital work-in-progress.

**e. Impairment of assets**

**Impairment of non-financial assets**

The Company assesses at each balance sheet date whether there is any indication that an asset or a group of assets comprising a cash generating unit may be impaired. If any such indication exists, the Company estimates the recoverable amount of the asset. For an asset or group of assets that does not generate large independent cash inflows, the recoverable amount is determined for the cash-generating unit to which the asset belongs. If such recoverable amount of the asset or the recoverable amount of the cash generating unit to which the asset belongs is less than its carrying amount, the carrying amount is reduced to its recoverable amount. The reduction is treated as an impairment loss and is recognised in the statement of profit and loss. If at the balance sheet date there is an indication that if a previously assessed impairment loss no longer exists, the recoverable amount is reassessed, and the asset is reflected at the recoverable amount subject to a maximum of depreciable historical cost. An impairment loss is reversed only to the extent that the carrying amount of asset does not exceed the net book value that would have been determined, if no impairment loss had been recognized.

**f. Employee benefits**

The Company has one employee. The Company is of the opinion that the provisions of the Payment of Gratuity Act, 1972 are not applicable to it. Accordingly, no provision is considered necessary in respect of the same.

In respect of recognition and measurement of short term accumulated compensated absences, the Company's policy is that employee is not entitled to cash payment for unused leave entitlement. Accordingly, no provision is considered necessary in respect of the same.

**g. Revenue recognition**

Effective April 1, 2018, the Company has applied Ind AS 115 which establishes a comprehensive framework for determining whether, how much and when revenue is to be recognised. Ind AS 115 replaces Ind AS 18 Revenue and Ind AS 11 Construction Contracts. The impact of the adoption of the standard on the financial statements of the Company is insignificant.





**Professional Fees**

The Company recognises professional fees income on accrual basis.

**Profit on sale of Investments**

Profit on sale of investments is recorded on transfer of title from the Company and is determined as the difference between the sales price and carrying value of the investment.

**Dividend Income**

Dividend income on investments is accounted for when the right to receive the payment is established. Profit on sale of Investment is recognised at the time of redemption/sale based on contract note.

**Interest Income**

Under Ind AS 109, Interest income is recognised by applying the Effective Interest Rate (EIR) to the gross carrying amount of loans and advances (financial assets recognized at amortized cost) other than credit-impaired assets and financial assets classified as measured at fair value through Profit and loss (FVTPL).

**Commodities Sale**

The Company recognises revenues when control of the goods is transferred to the customer at an amount that reflects the consideration to which the Company expects to be entitled in exchange for those goods. The terms of arrangements in case of sales, including the timing of transfer of control, delivery specifications and other contractual and commercial terms, are relevant factors in determining the timing and value of revenue to be recognised. The Company believes that the control gets transferred to the customer on dispatch of the goods from the warehouse.

**Goods & Service Tax (GST)**

Goods & Services Tax is credited separately as liability and payments are debited to that account. No charge is made to Statement of Profit and Loss in respect of GST collected and paid except when the tax incurred on a purchase of assets or services is not recoverable from the taxation authority, in which case, the tax paid is recognised as part of the cost of acquisition of the asset or as part of the expense item, as applicable.

Any undisputed GST demand from the respective authorities is charged to the Statement of Profit and Loss on the completion of assessment. Similarly, refund due is accounted as revenue and credited to the Statement of Profit and Loss on completion of assessment.

**Commodity Derivative Contracts**

**Initial recognition and subsequent measurement**

The Company enters into derivative instruments such as commodity future contract to manage its exposure to risk associated with commodity prices fluctuations. The counter party for those contracts are multi-commodity exchange.

The Company's use of these instruments is intended to mitigate exposure to market variables. The Company's senior management has assessed and evaluated that committed purchase and sales contracts are in scope of 'Financial Instrument' as per Ind AS 109. .

All such contracts are initially recognised at fair value through profit or loss and subsequently re-measured at fair value. The changes in fair value of commodity derivatives are recognised in Statement of Profit or Loss.



**h. Taxation**

Income tax expense comprises current tax and deferred tax charge or credit. Income tax expense is recognized in statement of profit or loss except to the extent that it relates to items recognized in other comprehensive income (OCI) or directly in equity.

***Current tax***

Current tax is the tax payable or receivable on the taxable income or loss for the year and any adjustment to the tax payable or receivable in respect of the previous year. It is measured using tax rates (and tax laws) enacted or substantially enacted by the reporting date.

Current tax assets and current tax liabilities are offset only if there is a legally enforceable right to set off the recognised amounts, and it is intended to realise the asset and settle the liability on a net asset basis.

***Deferred tax***

Deferred tax is recognised in respect of temporary differences between the carrying amounts of assets and liabilities for financial reporting purposes and the corresponding amounts used for taxation purposes.

Deferred tax assets are recognised only to the extent that it is probable that future taxable profits will be available against which they can be used. Deferred tax assets are reviewed at each balance sheet date and are recognised/ reduced to the extent that it is probable / no longer probable respectively that the related tax benefit will be realised.

Deferred tax is measured at the tax rates that are expected to apply to the period when the asset is realised or the liability is settled, based on the laws that have been enacted or substantively enacted by the reporting date.

Deferred tax relating to items recognised outside statement of profit or loss is recognised outside statement of profit or loss (either in OCI or in equity). Deferred tax items are recognised in correlation to the underlying transaction either in OCI or directly in equity.

**i. Cash flow statement**

Cash flows are reported using the indirect method, whereby net profit/ (loss) before tax is adjusted for the effects of transactions of a non-cash nature and any deferrals or accruals of past or future cash receipts or payments. The cash flows from regular revenue generating, investing and financing activities of the Company are segregated.

**j. Earnings per share**

Basic earnings per share are computed by dividing profit or loss attributable to equity shareholders of the Company by the weighted average number of equity shares outstanding during the period. The Company did not have any potentially dilutive securities in any of the periods presented.

**k. Provisions and contingent liabilities**

The Company creates a provision when there is a present obligation as a result of a past event that probably requires an outflow of resources, and a reliable estimate can be made of the amount of the obligation. A disclosure for a contingent liability is made when there is a possible obligation or a





present obligation that may, but probably will not, require an outflow of resources. Where there is possible obligation or a present obligation in respect of which the likelihood of outflow of resources is remote, no provision or disclosure is made.

Provisions for onerous contracts i.e. contracts where the expected unavoidable costs of meeting the obligations under the contract exceed the economic benefits expected to be received under it, are recognised when it is probable that an outflow of resources embodying economic benefits will be required to settle a present obligation as a result of an obligating event, based on a reliable estimate of such obligation.

## **I. Financial Instruments**

### ***i. Initial recognition of financial instruments:***

The Company recognizes financial assets and financial liabilities when it becomes a party to the contractual provisions of the instrument. All financial assets and liabilities are recognized at fair value on initial recognition, except for trade receivables which are initially measured at transaction price. Financial asset and liability not recorded at fair value through profit and loss (FVTPL), is initially measured at fair value plus transaction costs that are directly attributable to its acquisition or issue.

### ***ii. Subsequent measurement of financial assets:***

#### ***Cash and cash equivalents***

The Company considers all highly liquid financial instruments, which are readily convertible into known amounts of cash that are subject to an insignificant risk of change in value and having original maturities of three months or less from the date of purchase, to be cash equivalents. Cash and cash equivalents consist of balances with banks which are unrestricted for withdrawal and usage.

#### ***Financial assets at amortized cost***

Financial assets are subsequently measured at amortized cost if these financial assets are held within a business whose objective is to hold these assets in order to collect contractual cash flows and the contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

#### ***Financial assets at fair value through other comprehensive income***

Financial assets are measured at fair value through other comprehensive income if these financial assets are held within a business whose objective is achieved by both collecting contractual cash flows that give rise on specified dates to solely payments of principal and interest on the principal amount outstanding and by selling financial assets.

#### ***Financial assets at fair value through profit or loss***

Financial assets are measured at fair value through profit or loss unless it is measured at amortized cost or at fair value through other comprehensive income on initial recognition. The transaction costs directly attributable to the acquisition of financial assets and liabilities at fair value through profit or loss are immediately recognised in profit or loss.



**iii. Subsequent measurement of Financial liability**

Financial liabilities are subsequently carried at amortized cost using the effective interest method. For trade and other payables maturing within one year from the Balance Sheet date, the carrying amounts approximate fair value due to the short maturity of these instruments.

**iv. De-recognition of financial instruments**

The company derecognizes a financial asset when the contractual rights to the cash flows from the financial asset expire or it transfers the financial asset and the transfer qualifies for de-recognition under Ind-As 109. A financial liability (or a part of a financial liability) is derecognized from the Company's Balance Sheet when the obligation specified in the contract is discharged or cancelled or expires.

In determining the fair value of its financial instruments, the Company uses a variety of methods and assumptions that are based on market conditions and risks existing at each reporting date. The methods used to determine fair value include discounted cash flow analysis, available quoted market prices and dealer quotes. All methods of assessing fair value result in general approximation of value, and such value may never actually be realized.

**v. Fair value measurement**

In determining the fair value of its financial instruments, the Company uses a variety of methods and assumptions that are based on market conditions and risks existing at each reporting date. The methods used to determine fair value include discounted cash flow analysis, available quoted market prices and dealer quotes. All methods of assessing fair value result in general approximation of value, and such value may never actually be realized.

For all other financial instruments, the carrying amount approximates fair value due to the short maturity of those instruments.





SHREENATH INVESTMENT COMPANY LIMITED

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

4 Property, Plant and Equipment

Particulars	Building*	Furniture and Fixtures	Office Equipment	Total
<b>Gross Block</b>				
As at April 01, 2022	34.28	2.72	9.41	46.42
Additions	-	-	-	-
Deletions	-	2.72	9.41	12.13
As at March 31, 2023	34.28	-	-	34.28
Additions	-	-	-	-
Deletions	-	-	-	-
As at March 31, 2024	34.28	-	-	34.28
<b>Accumulated Depreciation</b>				
As at April 01, 2022	29.14	2.55	8.95	40.65
Depreciation for the year	0.28	-	-	0.28
Accumulated Depreciation on deletions	-	2.55	8.95	11.51
As at March 31, 2023	29.42	-	-	29.42
Depreciation for the year	0.21	-	-	0.21
Accumulated Depreciation on deletions	-	-	-	-
As at March 31, 2024	29.63	-	-	29.63
<b>Net block</b>				
As at April 01, 2022	5.14	0.17	0.46	5.77
As at March 31, 2023	4.86	-	-	4.86
As at March 31, 2024	4.65	-	-	4.65

(\*) Includes 20 shares of Dalamal Tower Premises Co-operative Society Ltd of Rs.50 each aggregating to Rs.1,000



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**Non-current financial assets**

**5.1 Investments (Fair value through OCI)**

Particulars	As at March 31, 2024	As at March 31, 2023
Investment in equity shares	26,967.06	19,298.60
Less: Provision for Diminution in value of Shares	-	-
<b>Total</b>	<b>26,967.06</b>	<b>19,298.60</b>

**Non-Current Financial Assets**

**5.2 Other Non-Current Assets**

Particulars	As at March 31, 2024	As at March 31, 2023
Deposit - Office	5.48	5.48
Deposit - Rent	0.17	0.17
Deposit - BEST	0.40	0.40
<b>Total</b>	<b>6.05</b>	<b>6.05</b>

**Current Assets**

**6. Investments (Fair valued through statement of profit & loss)**

Particulars	As at March 31, 2024	As at March 31, 2023
<b>In units of Mutual Funds (unquoted):</b>		
HDFC Liquid Fund Direct Plan - Growth	-	1,022.41
HDFC Overnight Fund Direct Plan - Growth	3,804.13	101.52
HDFC Money Market Fund DP-Growth	409.21	380.00
Trust MF Liquid Fund-Direct-Growth Plan	6.56	6.11
<b>Total</b>	<b>4,219.90</b>	<b>1,510.04</b>

**Current Assets**

**7. Cash and Cash Equivalents**

Particulars	As at March 31, 2024	As at March 31, 2023
Cash on hand	0.04	0.04
Balance with scheduled banks in current accounts	12.81	1.13
<b>Total</b>	<b>12.85</b>	<b>1.17</b>

**Current Assets**

**8. Loans & Advances**

Particulars	As at March 31, 2024	As at March 31, 2023
Inter Corporate Loan*	2,542.00	-
<b>Total</b>	<b>2,542.00</b>	<b>-</b>

\* Repayable on demand

**Current Assets**

**9. Current Tax Assets (net)**

Particulars	As at March 31, 2024	As at March 31, 2023
Income tax paid (net of provision for tax)	1.14	3.08
<b>Total</b>	<b>1.14</b>	<b>3.08</b>

**Current Assets**

**10. Other Current Assets**

Particulars	As at March 31, 2024	As at March 31, 2023
Prepaid Expenses	0.02	0.11
Balance with Indirect Tax Authorities	6.24	0.02
<b>Total</b>	<b>6.26</b>	<b>0.13</b>



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**11. Authorised, Issued, Subscribed and Paid-up Share Capital**

	As at March 31, 2024	As at March 31, 2023
<b>Authorised share capital</b>		
<b>Equity Share Capital</b>		
2,50,00,000 (Previous year 250,000) Equity Share of Rs 10 Each Fully Paid up	2,500.00	25.00
	<b>2,500.00</b>	<b>25.00</b>
<b>Issued, Subscribed and Paid-up Share Capital</b>		
250,000 (Previous year 250,000) Equity Shares of Rs. 10 Each Fully Paid up	25.00	25.00
	<b>25.00</b>	<b>25.00</b>

**Shareholders holding more than 5% of the shares**

Shareholders	As at March 31, 2024		As at March 31, 2023	
	% held	Nos	% held	Nos
Mangal Bhanshali	12.28%	30,700	12.28%	30,700
Shamyak Investment Private Limited	9.60%	24,000	4.80%	12,000

**Reconciliation of number of shares**

	As at March 31, 2024	As at March 31, 2023
<b>Number of Equity Shares</b>		
Outstanding at the beginning of the year	2,50,000	2,50,000
Add: Shares issued during the year	-	-
<b>Outstanding at the end of the year</b>	<b>2,50,000</b>	<b>2,50,000</b>

Promoter name	2023-24		
	No. of shares	% of total shares	% change during the year
Mangal Bhanshali	30,700	12.28	-
Shamyak Investment Private Limited	24,000	9.60	4.80
Akash Bhanshali	12,175	4.87	-
Lata Bhanshali	12,050	4.82	-
Advanced Compuflow Private Limited	-	-	(4.80)
Shah Rekha Nemish	12,000	4.80	-
Meenu Bhanshali	11,950	4.78	-
Suraj Bhanshali	11,500	4.60	-
Blue Daimond Properties Private Limited	11,500	4.60	-
Kavita Ketan Shah	10,725	4.29	-
Ketan Shantilal Shah	10,600	4.24	-
Shah Krutarth Nemish	10,100	4.04	-
Shantilal R Shah HUF	9,750	3.90	-
Abha Satyen Shah	5,000	2.00	-



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

Shares held by promoters during the year		2022-23	
Promoter name	No. of shares	% of total shares	% change during the year
Mangal Bhanshali	30,700	12.28	-
Akash Bhanshali	12,175	4.87	-
Lata Bhanshali	12,050	4.82	-
Advanced Compuflow Private Limited	12,000	4.80	-
Shamyak Investment Private Limited	12,000	4.80	-
Shah Rekha Nemish	12,000	4.80	-
Meenu Bhanshali	11,950	4.78	-
Suraj Bhanshali	11,500	4.60	-
Blue Daimond Properties Private Limited	11,500	4.60	-
Kavita Ketan Shah	10,725	4.29	-
Ketan Shantilal Shah	10,600	4.24	-
Shah Krutarth Nemish	10,100	4.04	-
Shantilal R Shah HUF	9,750	3.90	-
Abha Satyen Shah	5,000	2.00	-

**Rights, Preferences and Restrictions attached to each class of shares**

The company has one class of equity shares having a par value of Rs.10 per share. Each shareholder is eligible for one vote per share held. The holders of equity shares are entitled to interim dividend and dividend, if any, proposed by the Board of Directors and approved by Shareholders at Annual General Meeting. In the event of liquidation, the equity shareholders are eligible to receive the remaining assets of the Company after distribution of all preferential amounts, in proportion to their shareholding.

**In the last 5 years preceding the balance sheet date:**

No shares have been allotted as fully paid shares without payment being received in cash.

No shares are allotted as fully paid shares by way of bonus shares.

No calls are unpaid by directors or officers.

No shares are bought back by the company.

No shares have been forfeited during the year.

**12. Other Equity**

Particulars	As at	As at
	March 31, 2024	March 31, 2023
Retained Earnings	7,928.51	2,906.52
Capital Reserve	8.66	8.66
Other Comprehensive Income	22,804.66	15,831.89
	<b>30,741.83</b>	<b>18,747.07</b>





**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**Non-Current Liabilities****13. Deferred Tax Liabilities (Net)**

Particulars	As at March 31, 2024	As at March 31, 2023
<b>Deferred Tax liability arising on account of :</b>		
Fair value gain on mutual funds	13.96	5.49
Fair value gain on equity shares (OCI)	2,945.56	2,044.85
<b>Total</b>	<b>2,959.52</b>	<b>2,050.34</b>

**Current Liabilities****14. Other Financial Liabilities**

Particulars	As at March 31, 2024	As at March 31, 2023
Creditors For Expenses	1.24	1.44
<b>Total</b>	<b>1.24</b>	<b>1.44</b>

There are no dues and no interest due or outstanding to Micro, Small and Medium Enterprises.

**Current Liabilities****15. Other Current Liabilities**

Particulars	As at March 31, 2024	As at March 31, 2023
Statutory Dues	0.63	0.08
<b>Total</b>	<b>0.63</b>	<b>0.08</b>

**Current Liabilities****16. Current Tax Liabilities (Net)**

Particulars	As at March 31, 2024	As at March 31, 2023
Current Tax Liabilities (net of income tax paid)	31.69	-
<b>Total</b>	<b>31.69</b>	<b>-</b>



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**17. Revenue from Operations**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Sale of stock-in-trade	5,889.82	-
<b>Total</b>	<b>5,889.82</b>	<b>-</b>

**18. Other Income**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Dividend (Investments at FVOCI)	76.23	103.82
Rent income	-	7.50
Interest income	71.93	0.05
Net gain on current investment at fair value through profit & loss	264.56	76.07
<b>Total</b>	<b>412.72</b>	<b>187.44</b>
<b>Fair Value changes:</b>		
Unrealised gain/(loss)	33.92	(57.37)
Realised gain	230.64	133.44
<b>Net gain on investment at fair value through profit &amp; loss</b>	<b>264.56</b>	<b>76.07</b>

**19. Employee Benefit Expenses**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Salary, Incentive & Allowance	4.68	3.00
<b>Total</b>	<b>4.68</b>	<b>3.00</b>

**20. Depreciation and Amortisation**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Depreciation	0.21	0.28
<b>Total</b>	<b>0.21</b>	<b>0.28</b>

**21. Other Expenses**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Advertisement (Statutory)	0.90	0.58
Repairs and Maintenance Expenses	9.36	9.39
Auditors' Remuneration		
Audit Fees	0.45	0.53
Limited Review Fees	0.30	0.36
Taxation Fees	0.20	0.20
Out of Pocket Expenses	0.04	0.06
Brokerage on Commodity Trade	4.72	-
Rent Expenses	1.28	-
Depository Charges	0.31	1.65
Electricity Charges	4.80	4.55
Property, Plant and Equipment Written Off	-	0.63
Listing Fees	3.25	3.54
Professional Fees	1.77	2.03
Rates and Taxes	32.12	0.81
Goods & Services Tax	0.09	-
Miscellaneous Expenses	0.16	0.14
<b>Total</b>	<b>59.75</b>	<b>24.47</b>



**22. Tax Expense****22.1**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Current tax (including earlier years)	86.85	58.51
Deferred tax	8.47	(3.41)
<b>Income tax expense reported in the statement of profit and loss</b>	<b>95.32</b>	<b>55.10</b>

The major components of income tax expense and reconciliation of expected tax expense based on the domestic effective tax rate of the Company at 25.168% for current and previous year and the reported tax expense in the statement of profit or loss are as follows:

**Reconciliation of tax expense and the accounting profit multiplied by tax rate**

Accounting profit before income tax	363.21	158.19
Tax rate of 25.168% (March 31 2023: 25.168%)	91.41	39.81

**Tax effect of amounts which are not deductible (taxable) in calculating taxable income:**

Tax effect on gains calculated as per books and per IT on mutual funds	(3.72)	11.03
Expenses disallowed under Income Tax	7.63	4.26

<b>Income tax expense reported in the statement of profit and loss</b>	<b>95.32</b>	<b>55.10</b>
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**22.2 Income tax recognised in Other Comprehensive Income**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Deferred tax		
Net fair value gain on investments in equity instruments at FVTOCI	1,514.65	1,140.62
<b>Total income tax recognised in other comprehensive income</b>	<b>1,514.65</b>	<b>1,140.62</b>
Bifurcation of the income tax recognised in other comprehensive income into:-		
Items that will not be reclassified to profit or loss	1,514.65	1,140.62
<b>Total</b>	<b>1,514.65</b>	<b>1,140.62</b>

**23. Earning Per Equity Share**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
<b>Net profit attributable to equity shareholders</b>		
Net profit for the year	267.89	103.09
Nominal value of equity share Rs.	10.00	10.00
Total number of equity shares outstanding at the beginning of the year	2,50,000	2,50,000
Total number of equity shares outstanding at the end of the year	2,50,000	2,50,000
Weighted-average number of equity shares	2,50,000	2,50,000
<b>Basic and Diluted</b>	<b>107.15</b>	<b>41.24</b>



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**24 Contingent Liabilities**

A. Claims against the Company not acknowledged as debt : Provision is not considered necessary for the following Income Tax demands in respect of which the Company has filed letters with the jurisdictional Assessing Officer disputing the said demands and requesting for rectification:

- a. Assessment Year 2015-16 : Rs. 15.90 Lakhs (Previous Year : Rs. 15.90 Lakhs)
- b. Assessment Year 2019-20 : Rs.0.54 Lakhs (Previous Year : Rs.0.54 Lakhs)

These claims by the Income Tax Department represent demands raised on account of error in computing the total income of Assessment Year 2015-16 and brought forward depreciation allowance not considered in computing the total income of Assessment Year 2019-20. These matters are pending before the jurisdictional Assessing officer and the Management expect that these demands will be ultimately rectified and cancelled by the Assessing Officer and there will be no material adverse effect on the Company's financial position and results of operations.

B. Additional liability, if any, arising pursuant to assessments under various fiscal statutes shall be accounted for in the year of assessment.

C. Contingent liabilities as may arise due to delayed compliance/non-compliance, if any, of various fiscal statutes-amount not ascertainable.

**25 Related Party Transactions**

**Names of related parties and description of relationship:**

**Relationship**

**Key managerial personnel (KMP)**

- Vikas Mapara (Managing Director) - Resigned *wef* March 27, 2024
- Jatin Jain (Additional Director [Managing Director]) - Appointed *wef* March 27, 2024
- Mayur Kadakia (Chief Financial Officer)

**Transaction with related parties:**

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Salary, Incentive & Allowance	1.68	-
<b>Total</b>	<b>1.68</b>	<b>-</b>

**Notes:**

- 1. No amount in respect of the related parties has been written off / back during the year.
- 2. Related parties relationship has been identified by the management and relied upon by the Auditors.

**26 Ratios**

The following are analytical ratios for the year ended March 31, 2024 and March 31, 2023

i)	<b>Current Ratio</b>	Year Ended March 31, 2024	Year Ended March 31, 2023
		Current Assets	6,782.15
	Current Liabilities	33.56	1.52
	<b>Ratio</b>	<b>202.11</b>	<b>995.39</b>
Reason for variance : Increase in Current Liabilities in FY 2023-24 as compared to FY 2022-23 is at higher rate than increase in Current Assets in FY 2023-24 as compared to FY 2022-23.			

ii)	<b>Return on Equity Ratio</b>	Year Ended March 31, 2024	Year Ended March 31, 2023
		Net Profit after Taxes	267.89
	Average Shareholders Equity	24,769.45	15,921.07
	<b>Ratio</b>	<b>0.01</b>	<b>0.01</b>
Reason for variance : No material variance			





**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

		Year Ended March 31, 2024	Year Ended March 31, 2023
iii)	<b>Return on Capital Employed (ROCE)</b>		
	Earning before interest and taxes	363.21	159.70
	Capital Employed	33,726.35	20,822.41
	<b>Ratio</b>	<b>0.0108</b>	<b>0.0077</b>
Reason for variance : Due to increase in amount of earning			

		Year Ended March 31, 2024	Year Ended March 31, 2023
iv)	<b>Return on Investment</b>		
	Net Profit after Tax + Other Comprehensive Income	11,994.76	5,702.01
	Total Equity	30,766.83	18,772.07
	<b>Ratio</b>	<b>0.39</b>	<b>0.30</b>
Reason for variance : Due to decrease in Return and increase in Total Equity			

		Year Ended March 31, 2024	Year Ended March 31, 2023
v)	<b>Net Capital Turnover Ratio</b>		
	Net Sales	5,889.82	-
	Total Equity	30,766.83	18,772.07
	<b>Ratio</b>	<b>0.19</b>	-
Reason for variance : Due to commencement of commodity business			

		Year Ended March 31, 2024	Year Ended March 31, 2023
v)	<b>Net Profit Ratio</b>		
	Net Profit after Tax	267.89	103.09
	Net Annual Sales	5,889.82	-
	<b>Ratio</b>	<b>0.05</b>	-
Reason for variance : Not Applicable because there were no sales in the previous year.			

- ii) In view of the nature of activity of the Company, the following ratios are not applicable to the Company :
- Debt-Equity Ratio
  - Debt Service Coverage Ratio
  - Inventory Turnover Ratio
  - Trade Receivables Turnover Ratio
  - Trade Payables Turnover Ratio



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**27 Financial Instruments by Category**

Financial assets and financial liabilities are measured at fair value in the financial statement and are grouped into three levels of a fair value hierarchy. The three Levels are defined based on the observability of significant inputs to the measurement, as follows:

**Fair value hierarchy**

**Level 1:** quoted prices (unadjusted) in active markets for financial instruments.

**Level 2:** inputs other than quoted prices included within Level 1 that are observable for the asset or liability, either directly or

**Level 3:** unobservable inputs for the asset or liability.

**Fair value of instruments :**

Particulars	Level	Year Ended March 31, 2024	Year Ended March 31, 2023
Investments (FVOCI)	Level 1	26,967.06	19,298.60
Investments (FVPL)	Level 1	4,219.90	1,510.04

Financial assets not measured at fair value includes cash and cash equivalents, loans and advances. These are financial assets whose carrying amounts approximate fair value, due to their short-term nature.

Additionally, financial liabilities such other financial liabilities are not measured at FVTPL, whose carrying amounts approximate fair value, because of their short-term nature.

**Valuation techniques used to determine fair value**

Quoted equity investments - Quoted closing price on stock exchange

Mutual fund - Based on Net Asset Value of the mutual fund scheme

**28 Financial Risk Management****i) Financial instruments by category**

For amortised cost instruments, carrying value represents the best estimate of fair value.

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
<b>Financial Assets</b>	<b>Fair Value</b>	<b>Fair Value</b>
Investments	31,186.96	20,808.64
Other Non-Current Assets	6.05	6.05
Loans and Advances	2,542.00	-
Cash and cash equivalents	12.85	1.17
<b>Total</b>	<b>33,747.86</b>	<b>20,815.87</b>
<b>Financial Liabilities</b>	<b>Fair Value</b>	<b>Fair Value</b>
Other financial liabilities	1.24	1.44
<b>Total</b>	<b>1.24</b>	<b>1.44</b>

**ii) Risk Management**

The Company's activities expose it to market risk, credit risk and liquidity risk. The Company's Board of Directors has overall responsibility for the establishment and oversight of the Company's risk management framework. This note explains the sources of risk which the entity is exposed to and how the entity manages the risk and the related impact in the financial statements.

**A) Credit risk**

Credit risk arises from the possibility that the counterparty will cause financial loss to the company by failing to discharge its obligation as agreed. To manage this, the Company periodically assesses the financial reliability of the counter parties, taking into account the financial condition, current economic trends, and analysis of historical bad debts and ageing of accounts receivable.

Credit risk arises primarily from financial assets such as trade receivables, investments, other balances with banks and loan and advances.



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

The company provides for expected credit loss in case of trade receivables when there is no reasonable expectation of recovery. The company continues to engage to recover the receivable due. Where recoveries are made, these are recognised in profit or loss. Credit risk arising from investments in mutual funds and other balances with banks is limited as the counterparties are banks and financial institutions with high credit ratings.

The company did not have any outstanding receivables as at March 31, 2024 and March 31, 2023. Accordingly, the company has not made any ECL provisions

**B) Liquidity Risk**

Liquidity risk is defined as the risk that the Company will encounter difficulty in meeting obligations associated with financial liabilities that are settled by delivering cash or another financial asset. The objective of liquidity risk management is to maintain sufficient liquidity and ensure that funds are available for use as per requirements. The Company's principal sources of liquidity are cash and cash equivalents and investments. The Company has consistently generated sufficient cash flows from its operations and believes that these cash flows along with its current cash and cash equivalents and funding arrangements are sufficient to meet its financial obligations as and when they fall due. Accordingly, liquidity risk is perceived to be low.

Particulars	As at March 31, 2024		
	Within 12 months	After 12 months	Total
<b>Financial Assets</b>			
Investments	4,219.90	26,967.06	31,186.96
Cash and Cash Equivalents	12.85	-	12.85
Other Non-Current Assets	6.05	-	6.05
Loans and Advances	2,542.00	-	2,542.00
<b>Total Financial Assets</b>	<b>6,780.79</b>	<b>26,967.06</b>	<b>33,747.86</b>
<b>Financial Liabilities</b>			
Other Financial Liabilities	1.24	-	1.24
<b>Total Financial Liabilities</b>	<b>1.24</b>	<b>-</b>	<b>1.24</b>

Particulars	As at March 31, 2023		
	Within 12 months	After 12 months	Total
<b>Financial Assets</b>			
Investments	1,510.04	19,298.60	20,808.64
Cash and Cash Equivalents	1.17	-	1.17
Other Non-Current Assets	6.05	-	6.05
Loans and Advances	-	-	-
<b>Total Financial Assets</b>	<b>1,517.27</b>	<b>19,298.60</b>	<b>20,815.87</b>
<b>Financial Liabilities</b>			
Other Financial Liabilities	1.44	-	1.44
<b>Total Financial Liabilities</b>	<b>1.44</b>	<b>-</b>	<b>1.44</b>

**C) Market Risk**

Market risk is the risk that the fair value or future cash flows of a financial instrument will fluctuate because of changes in market prices. The value of a financial instrument may change due to changes in the interest rates. Financial instruments affected by market risk includes quoted equity shares and debt mutual funds.





**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**29 Capital Management**

The Company's objectives when managing capital are to safeguard its ability to continue as a going concern, so that it can continue to provide returns for shareholders and benefits for other stakeholders, and maintain an optimal capital structure to maximise shareholder value.

For the purpose of the Company's capital management, capital includes capital and all other equity reserves. The Company manages its capital structure and makes adjustments in the light of changes in the economic environment. In order to maintain or achieve an optimal capital structure, the Company allocates its capital for distribution as dividend or re-investment into business based on its long term financial plans. As at March 31, 2024, the Company has only one class of equity shares. Hence, there are no externally imposed capital requirements.

The Company's adjusted net debt to equity ratio is as follows:

Particulars	Year Ended March 31, 2024	Year Ended March 31, 2023
Total external liabilities	33.56	1.52
Less: cash and cash equivalents	12.85	1.17
Adjusted net debt	20.71	0.35
Total equity	30,766.83	18,772.07
<b>Adjusted net debt to equity ratio</b>	<b>0.00</b>	<b>0.00</b>

**30 Segment Reporting**

The Company primarily operates in single business and geographical segment. Hence, no additional disclosures are required to be given as per Ind AS 108 on Operating Segments, other than those already given in the financial results.

**31 Corporate Social Responsibility**

The company does not meet the eligibility criteria set out in section 135(1) of Companies Act 2013. CSR obligation is not applicable to the company.

**32 Dues To Micro And Small Enterprises**

Information related to Micro, Small and Medium Enterprises Development Act, 2006 (Act) has been determined to the extent such parties have been identified on the basis of information available with the Company. There outstanding balance due to such parties at year end is Rs. Nil (Previous Year Nil).

Particulars	As at March 31, 2024	As at March 31, 2023
1) The principal amount remaining unpaid to any supplier at the end of accounting year included in payables	-	-
2) The interest due on above	-	-
3) The amount of interest paid by the buyer in terms of section 16 of the Act	-	-
4) The amount of interest due and payable for the period of delay in making payment (which have been paid but beyond the due date during the year) but without adding the interest specified under this Act.	-	-
5) The amount of further interest remaining due and payable even in the succeeding years, until such date when the interest dues above are actually paid to the small enterprise, for the purpose of disallowance of a deductible expenditure under section 23 of the Micro, Small and Medium Enterprises Development Act, 2006.	-	-



**SHREENATH INVESTMENT COMPANY LIMITED**

Notes forming part of the financial statements for year ended March 31, 2024

All amounts are in INR Lakhs, unless otherwise stated

**33 Events after reporting date**

There have been no events after the reporting date that require disclosure in this financial statement.

**34 The disclosure on the following matters required under Schedule III as amended, not being relevant or applicable in case of the Company, are not covered:**

- a The Company has not traded or invested in crypto currency or virtual currency during the financial year.
- b No proceedings have been initiated or are pending against the Company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and rules made thereunder.
- c The Company has no transactions with the Companies struck off under the Companies Act, 2013 or Companies Act, 1956
- d The Company has not been declared wilful defaulter by any bank or financial institution or government or any government authority.
- e No satisfaction of charges are pending to be filed with ROC.
- f There are no transactions which are not recorded in the books of account which have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961.
- g There have been no revaluation of revaluation of Plant, Property and Equipment during the current year.
- h The Company has not entered into scheme of arrangement in current or previous financial year.
- i The Company has not advanced or loaned or invested (either from borrowed funds or share premium or any other sources or other kind of funds) to or in any other person or entity, including foreign entity ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.
- j The Company has not received any funds (which are material either individually or in the aggregate) from any person or entity, including foreign entity ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the Company shall, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries.

**35** Previous year's figures have been regrouped/reclassified wherever required.

**FOR KAMDAR DALAL & ASSOCIATES**  
FIRM REGISTRATION NO. : 129596W  
CHARTERED ACCOUNTANTS



**S.K.KAMDAR**  
PARTNER  
MEMBERSHIP NO. : 032878



For and on behalf of the Board of Directors  
**SHREENATH INVESTMENT COMPANY LIMITED**



**JATIN JAIN**  
MANAGING DIRECTOR  
DIN: 08521872



**ASHWIN JAIN**  
DIRECTOR  
DIN: 00173983



**PRIYA DHANUKA**  
COMPANY SECRETARY  
Membership No. A34564



**MAYUR KADAKIA**  
CHIEF FINANCIAL OFFICER

Mumbai : Dated 23/05/2024





# KAMDAR DALAL & ASSOCIATES CHARTERED ACCOUNTANTS

C-3/2, Khira Nagar, S.V.Road, Santacruz West, Mumbai – 400 054

Phones : 022-2661 4713 / 022-2661 5677

Email : skkandco@gmail.com

## INDEPENDENT AUDITOR'S REPORT

To the Members of  
SHREENATH INVESTMENT COMPANY LIMITED

### Opinion

We have audited the standalone financial statements of **Shreenath Investment Company Limited** which comprise the balance sheet as at 31st March 2024, and the statement of Profit and Loss (including other comprehensive income), statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information (hereinafter referred to as "the standalone financial statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2024, and profit (including other comprehensive income), changes in equity and its cash flows for the year ended on that date.

### Basis for Opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Act. Our responsibilities under those Standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the standalone financial statements under the provisions of the Act and the Rules thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For the matter described below, our description of how our audit addressed the matter is provided in that context.

We have determined the matters described below to be the key audit matters to be communicated in our report. We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the standalone financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the standalone financial statements. The results of our audit procedures, including the procedures performed to address the matter below, provide the basis for our audit opinion on the accompanying standalone financial statements.





Key Audit Matter	How our audit addressed the key audit matter
<p><b>Accuracy of recognition, measurement, presentation and disclosure of revenue from commodities sale</b></p> <p>The Company recognises revenues when control of the goods is transferred to the customer at an amount that reflects the consideration to which the Company expects to be entitled in exchange for those goods. The terms of arrangements in case of sales, including the timing of transfer of control, delivery specifications and other contractual and commercial terms, are relevant factors in determining the timing and value of revenue to be recognised. The Company considers revenue as a key performance measure which could create an incentive for overstatement revenue.</p> <p>Based on above, revenue recognition from commodities trading has been considered as a key audit matter for the current year's audit.</p>	<p>Our Audit procedures involve identification of internal controls and their operating effectiveness towards application of this standard. We have also carried out the substantive testing of the transactions. We have:</p> <ol style="list-style-type: none"> <li>Assessed the appropriateness of the revenue recognition policies by comparing with the applicable Indian accounting standards.</li> <li>Evaluated the accounting policies with respect to these transactions.</li> <li>Verified the internal controls towards identification of costs incurred towards the concerned transactions and ensured that only the costs related to the transactions are recorded.</li> <li>Verified the documents relating to satisfying the performance obligation and costs incurred thereunder.</li> <li>Assessed the disclosures made in the standalone financial statements in respect of revenue recognition in accordance with the applicable requirements.</li> </ol>

#### **Information Other than the Financial Statements and Auditor's Report Thereon**

The Company's Management and Board of Directors are responsible for the other information. The other information comprises the information included in the Company's Annual Report, but does not include the Standalone financial statements and our auditor's report thereon.

Our opinion on the Standalone financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the standalone Ind AS financial statements, our responsibility is to read the other information and, in doing so, consider whether such other information is materially inconsistent with the standalone financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

#### **Management's Responsibility for the Standalone Financial Statements**

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these standalone financial statements that give a true and fair view of the financial position, financial performance (including other comprehensive income), changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Indian Accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.





In preparing the standalone financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

The Board of Directors is also responsible for overseeing the Company's financial reporting process.

#### **Auditor's Responsibilities for the Audit of the Financial Statements**

Our objectives are to obtain reasonable assurance about whether the standalone financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these standalone financial statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit.

We also:

- identify and assess the risks of material misstatement of the standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the company has adequate internal financial controls with reference to standalone financial statements in place and the operating effectiveness of such controls.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the standalone financial statements, including the disclosures, and whether the standalone financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

Materiality is the magnitude of misstatements in the standalone financial statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the standalone financial statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the standalone financial statements.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.





We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the standalone financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

#### **Report on Other Legal and Regulatory Requirements**

As required by the Companies (Auditor's Report) Order, 2020 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act, we give in "Annexure A" a statement on the matters specified in paragraphs 3 and 4 of the Order, to the extent applicable.

As required by Section 143(3) of the Act, we report that:

- (a) We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
- (b) In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
- (c) The Balance Sheet, the Statement of Profit and Loss (including other comprehensive income), the Statement of Changes in Equity and Statement of Cash Flows dealt with by this Report are in agreement with the books of account.
- (d) In our opinion, the aforesaid standalone financial statements comply with the Indian Accounting Standards specified under Section 133 of the Act.
- (e) On the basis of the written representations received from the directors as on 31<sup>st</sup> March, 2024 taken on record by the Board of Directors, none of the directors is disqualified as on 31<sup>st</sup> March, 2024 from being appointed as a director in terms of Section 164(2) of the Act.
- (f) With respect to the adequacy of the internal financial controls with reference to standalone financial statements of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure B".
- (g) With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended, in our opinion and to the best of our information and according to the explanations given to us:
  - i. the Company does not have any pending litigations which would impact its financial position.
  - ii. the Company did not have any long-term contracts including derivative contracts. As such, the question of commenting on any material foreseeable losses thereon does not arise.
  - iii. there were no amounts which were required to be transferred by the Company to the Investor Education and Protection Fund.
  - iv. the management has represented that, to the best of its knowledge and belief, other than as disclosed in the note no. 34 to the accounts, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the company to or in any other person or entity, including foreign entity ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries;



- v. the management has represented that, to the best of its knowledge and belief, other than as disclosed in the note no. 34 to the accounts, no funds have been received by the company from any person or entity, including foreign entity ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate;
- vi. Based on such audit procedures that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), contain any material mis-statement.
- vii. The Company has neither declared nor paid any dividend during the year.
- viii. Based on our examination which included test checks, the Company has used an accounting software for maintaining its books of account for the financial year ended March 31, 2024 which has a feature of recording audit trail (edit log) facility and the same has operated throughout the year for all relevant transactions recorded in the software. Further, during the course of our audit we did not come across any instance of audit trail feature being tampered with.

As proviso to Rule 3(1) of the Companies (Accounts) Rules, 2014 is applicable from April 01, 2023, reporting under Rule 11(g) of the Companies (Audit and Auditors) Rules, 2014 on preservation of audit trail as per the statutory requirements for record retention is not applicable for the financial year ended March 31, 2024.

(h) With respect to the matter to be included in the Auditor's Report under Section 197(16) of the Act:

In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its director/s during the current year is in accordance with the provisions of Section 197 of the Act.

FOR KAMDAR DALAL & ASSOCIATES  
FIRM REGISTRATION NO.: 129596W  
CHARTERED ACCOUNTANTS



S.K.KAMDAR  
PARTNER  
MEMBERSHIP NO.: 032878  
UDIN : 24032878BKBHFD2336



MUMBAI : MAY 23, 2024





**ANNEXURE A TO THE INDEPENDENT AUDITOR'S REPORT**  
(Referred to in paragraph 1 of our Report of even date)

1. In respect of Company's Property Plant and Equipment and Intangible Assets:
  - a.
    - (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipment.
    - (b) The Company has maintained proper records showing full particulars of intangible assets.
  - b. The Company has a program of physical verification of Property, Plant and Equipment at the end of the year which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. Pursuant to the program, the Property, Plant and Equipment were physically verified by the Management during the year. According to the information and explanations given to us, no discrepancies were noticed on such verification.
  - c. Based on our examination of the share certificates and society maintenance bills provided to us, we report that the Immovable Properties held by Company i.e. Buildings (Office Premises) disclosed in the financial statements under Property, Plant and Equipment are in the name of the Company as at the balance sheet date.
  - d. The Company has not revalued any of its Property, Plant and Intangible assets during the year.
  - e. No proceedings have been initiated during the year or are pending against the Company as at March 31, 2024 for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (as amended in 2016) and rules made thereunder.
2. In respect of inventories:
  - a. During the year, the stock purchased by the Company was held by / lying with a third party and, although, the same was not physically verified by the Company, the receipt and delivery of the stock was confirmed by the third party. There was no inventory at the year-end.
  - b. The Company has not been sanctioned working capital limits in excess of Rs. 5 crore, in aggregate, at any point of time during the year, from banks or financial institutions on the basis of security of current assets. Hence, reporting under clause 3(ii)(b) of the Order is not applicable.
3. In respect of Loans given:
  - a. In our opinion and according to information and explanations given to us, the Company has granted an unsecured loan, which is repayable on demand, aggregating Rs.12,646.64 lakhs to a company. The balance outstanding at the end of the year was Rs.2,542.00 lakhs. In our opinion and according to information and explanations given to us, the Company has not provided any other loans or advances in the nature of loans or stood guarantee, or provided security to any other entity during the year. In our opinion and according to the information and explanations given to us, the terms and conditions of this loan are, prima facie, not prejudicial to the interest of the Company.
  - b. In our opinion and according to information and explanations given to us, the investments made during the year are, prima facie, not prejudicial to the interest of the Company.
  - c. In our opinion and according to information and explanations given to us, the loan is repayable on demand and payment of interest has been stipulated. The repayment of principal, as and when demanded by the Company, and receipt of interest are regular.
  - d. According to information and explanations given to us and based on the audit procedures performed, there is no overdue amount remaining outstanding as at the balance sheet date.
  - e. In our opinion and according to information and explanations given to us, loans or advances in the nature of loans which have fallen due during the year have not been renewed or extended nor have any fresh loans been granted to settle the overdue of existing loans.
  - f. In our opinion and according to information and explanations given to us, the Company has not granted any loans or advances in the nature of loans to related parties or to promoters as defined in clause (76) of section 2 of the Companies Act, 2013.



4. In respect of loans, investments, guarantees and security:
  - a. According to the information and explanations given to us, the Company has complied with the provisions of section 186 of the Companies Act, 2013 in respect of the investments made by it.
  - b. According to the information and explanations given to us, the Company has complied with the provisions of section 185 of the Companies Act, 2013 in respect of loan granted by it.
5. In respect of acceptance of deposits:  
The Company has not accepted any deposits or amounts which are deemed to be deposits. Hence, reporting under clause 3(v) of the Order is not applicable to the Company.
6. In respect of maintenance of cost records:  
According to the information and explanations given to us, the Company is not required to maintain cost records under sub-section 1 of section 148 of the Companies Act, 2013. Hence, reporting under clause 3(vi) of the Order is not applicable to the Company.
7. In respect of statutory dues :
  - a. According to the information and explanations given to us and the records of the Company examined by us, undisputed Income Tax dues and other statutory dues have been deposited regularly with the appropriate authorities. Further, as explained to us, the provisions of Provident Fund, Employees State Insurance, Sales Tax, Service Tax, Customs Duty, Excise Duty, Value Added Tax and Cess are not applicable to the Company during the year. As at 31/03/2024, there were no undisputed dues payable for more than six months from the date they became payable.
  - b. According to the information and explanations given to us, as at 31/03/2024, there were no disputed dues payable for more than six months from the date they became payable, except the following:

Nature of Statute	Nature of dues	Forum where dispute is pending	Period to which the amount relates	Amount (Rs. in lakhs)
Income Tax Act, 1961	Income Tax	Jurisdictional Assessing Officer	Assessment Year 2015-16	15.90
Income Tax Act, 1961	Income Tax	Jurisdictional Assessing Officer	Assessment Year 2019-20	0.58

8. There were no transactions relating to previously unrecorded income that have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961).
9. According to the records of the Company examined by us and the information and explanations given to us :
  - a. During the year, the Company has not defaulted in repayment of the principal amount and the interest amounts in respect of loans taken by it.
  - b. The Company has not been declared a wilful defaulter by any bank or financial institution or other lender.
  - c. The Company has not taken any term loan during the year and there are no outstanding term loans at the beginning of the year. Hence, reporting under clause 3(ix)(c) of the Order is not applicable.
  - d. According to the records of the Company examined by us and the information and explanation given to us, the Company has not utilised funds raised on short term basis for long term purposes during the year.
  - e. The Company has taken funds from an entity or person during the year. However, since the Company does not have any subsidiaries, associates or joint ventures, reporting under clause 3(ix)(e) of the Order is not applicable.
  - f. The company has not raised any loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies.





- 10.
- a. The Company has not raised moneys by way of initial public offer or further public offer (including debt instruments) during the year. Hence, reporting under clause 3(x)(a) of the Order is not applicable.
  - b. During the year, the Company has not made any preferential allotment or private placement of shares or fully or partly or optionally convertible debentures. Hence, reporting under clause 3(x)(b) of the Order is not applicable.
11. During the course of the examination of the books and records of the Company and the audit procedures performed in accordance with the generally accepted auditing practices in India and according to the information and explanations given to us :
- a. no fraud by the Company or any fraud on the Company has been noticed or reported during the year;
  - b. in view of "a" above, no report under sub-section (12) of section 143 of the Companies Act, 2013 was required to be filed by us in Form ADT-4, as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government during the year.
  - c. no whistle blower complaints have been received by the Company during the year.
12. The Company is not a Nidhi Company. Hence, reporting under clause (xii) of the Order is not applicable.
13. In our opinion, the Company is in compliance with Section 177 and 188 of the Companies Act, 2013 with respect to applicable transactions with the related parties and the details of related party transactions have been disclosed in the standalone financial statements as required by the applicable accounting standards.
- 14.
- a. In our opinion, the Company has an adequate internal audit system commensurate with the size and the nature of its business.
  - b. We have considered the internal audit reports for the year under audit, issued to the Company during the year and till date, in determining the nature, timing and extent of our audit procedures.
15. According to the information and explanations given to us, during the year the Company has not entered into any non-cash transactions with its directors or persons connected with its directors. Accordingly, provisions of section 192 of the Companies Act, 2013 are not applicable.
16. In respect of Non-Banking Finance Company (NBFC):  
The provisions of section 45-IA of the Reserve Bank of India Act, 1934, are not applicable to the Company. Accordingly, the requirement to report on clauses (xvi)(a), (b) and (c) of the Order is not applicable to the Company.
17. The Company has not incurred cash losses during the financial year covered by our audit and the immediately preceding financial year.
18. There has been no resignation of the statutory auditors of the Company during the year.
19. On the basis of financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the Board of Directors and management plans, we are of the opinion that no material uncertainty exists as on the date of the audit report that Company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date. We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due



within a period of one year from the balance sheet date will get discharged by the Company as and when they fall due.

20. The Company is not covered by the provisions of Section 135 of Companies Act, 2013 relating to Corporate Social Responsibility for the year. Hence, reporting under clause (xx) of Order is not applicable.

FOR KAMDAR DALAL & ASSOCIATES  
FIRM REGISTRATION NO.: 129596W  
CHARTERED ACCOUNTANTS



S.K.KAMDAR  
PARTNER  
MEMBERSHIP NO.: 032878  
UDIN : 24032878BKBHFD2336



MUMBAI : MAY 23, 2024





**ANNEXURE B TO THE INDEPENDENT AUDITOR'S REPORT OF EVEN DATE ON THE STANDALONE FINANCIAL STATEMENTS OF SHREENATH INVESTMENT COMPANY LIMITED**

**Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act")**

We have audited the internal financial controls over financial reporting of **Shreenath Investment Company Limited** ("the Company") as of March 31, 2024 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

**Management's Responsibility for Internal Financial Controls**

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India. These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

**Auditors' Responsibility**

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the "Guidance Note") and the Standards on Auditing, as specified under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company's internal financial controls system over financial reporting.

**Meaning of Internal Financial Controls Over Financial Reporting**

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that :

- (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;



- (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and
- (3) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

#### **Inherent Limitations of Internal Financial Controls Over Financial Reporting**

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future years are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

#### **Opinion**

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at March 31, 2024, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

#### **Explanatory Paragraph**

We have also audited, in accordance with the Standards on Auditing issued by the Institute of Chartered Accountants of India as specified under Section 143(10) of the Act, the financial statements of the Company, which comprise the Balance Sheet as at March 31, 2024 and the related Statement of Profit and Loss for the year then ended and a summary of significant accounting policies and other explanatory information and in our Report dated May 23, 2024 we have expressed an unqualified opinion thereon.

FOR KAMDAR DALAL & ASSOCIATES  
FIRM REGISTRATION NO: 129596W  
CHARTERED ACCOUNTANTS



S.K.KAMDAR  
PARTNER  
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MUMBAI : MAY 23, 2024