

**NATURO INDIABULL LIMITED**  
**(Formerly known as IT Indiabull Private Limited)**

Regd. Office: 01st Floor, 51, Lohiya Colony, 200 Ft. Bye-Pass Vaishali Nagar Jaipur-302021

CIN: L72900RJ2016PLC055890 E-Mail: [info@naturoindiabull.com](mailto:info@naturoindiabull.com) Contact: +91-9928234076

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Date: November 27, 2023

To,  
BSE Limited  
Department of Corporate Services  
Dalal Street  
Floor 25, P J Towers,  
Mumbai - 400001

Ref: SECURITY ID: NATURO

SCRIP CODE: 543579

**SUB: SUBMISSION OF STATEMENTS OF IMPACT OF AUDITOR'S QUALIFICATION**

This is with reference and in addition to the earlier announcement dated 25 November 2023 titled "Outcome of the Board Meeting of the Company held on November 25, 2023".

We are enclosing herewith statements of the impact of the Auditor's qualification for the half year ended September 30, 2023.

You are requested to take the above-cited information for your records.

Thanking you,

Yours faithfully,  
For NATURO INDIABULL LIMITED  
(Formerly known as IT Indiabull Private Limited)

GAURAV JAIN Digitally signed by GAURAV  
JAIN  
Date: 2023.11.27 18:04:20  
+05'30'  
GAURAV JAIN  
MANAGING DIRECTOR  
DIN: 08560737

**Statement on Impact of Audit Qualifications (for audit report with modified opinion) submitted along with half-year unaudited Financial Results ended on 30 September 2023**

Statement on Impact of Audit Qualifications on the half-year unaudited Financial Results ended on 30 September 2023  
[See Regulation 33 of the SEBI (LODR) (Amendment) Regulations, 2016]

I.	Sl. No.	Particulars	Audited Figures (as reported before adjusting for qualifications) (In Lakhs) (except EPS)	Adjusted Figures unaudited figures at adjusting for qualifications) (In Lakhs) (except EPS)
	1.	Turnover/ Total income	2874.75	2874.75
	2.	Total Expenditure	2798.40	2798.40
	3.	Net Profit/(Loss)	76.35	76.35
	4.	Earnings Per Share	0.75	0.75
	5.	Total Assets	8758.22	8758.22
	6.	Total Liabilities	8758.22	8758.22
	7.	Net Worth	2512.9	2512.9
		Any other financial item(s) (as felt appropriate by the management)	0.00	0.00

II.	a. Audit Qualification (each audit qualification separately):	<i>During the period, the Company has granted Loans and Advances of Rs 3983.27 Lacs, and the Total Loans and advances granted as of 30.09.2023 was Rs 5262.98 Lacs to various parties which are the contravention of Sections 185 and 186 of the Companies Act, 2013. The company has not provided any resolution or underlying documents and no shareholders' approval was obtained. Hence, we are unable to state whether these balances are recoverable or not to that extent, and accordingly impact of the same on profit &amp; loss is not ascertainable at this moment.</i>
	b. Type of Audit Qualification	<i>Qualified Conclusion</i>
	c. Frequency of qualification	<i>Appeared for the second time.</i>
	d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:	<i>The management acknowledges the concern raised about potential contraventions of Sections 185 and 186 of the Companies Act, 2013. We would like to clarify that it was not our intention to bypass any statutory requirements. We recognize the importance of compliance and take this matter seriously. In response to your observation, we are committed to promptly addressing the deficiencies highlighted. We will work on obtaining the necessary resolutions and appropriate documentation for the Loans and Advances in question. This process will be executed with utmost priority to ensure compliance with the relevant sections of the Companies Act. We further confirm that the aforesaid advances do not fall under the purview of Deposits as these were the advances given to the parties for the business arrangements. The Company is in the process of streamlining the appropriate documentation for said businesses and shall further furnish</i>

<p>(i) Management's estimation on the impact of audit qualification:</p> <p>(ii) If management is unable to estimate the impact, reasons for the same:</p> <p>(iii) Auditors' Comments on (i) or (ii) above:</p>	
<p>a. Audit Qualification (each audit qualification separately):</p>	<p><i>During the period the Company has accepted borrowings of Rs. 834.70 Lacs and Total accepted borrowing as of 30.09.2023 of Rs 1065.07 Lacs from various parties other than Directors and their relatives which are in contravention to Section 73 to 76 of the Companies Act, 2013. Further Company has not provided Counterparty ledger confirmation for accepted borrowings.</i></p>
<p>b. Type of Audit Qualification</p>	<p><i>Qualified Conclusion</i></p>
<p>c. Frequency of qualification</p>	<p><i>Appeared for the second time</i></p>
<p>d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:</p>	<p><i>Management reaffirms that the aforementioned advances are not categorized as deposits, as they were provided to parties in the context of business arrangements. The company is currently working on organizing the necessary documentation for these business transactions and commits to providing the Auditor with the required paperwork at the earliest possible.</i></p>
<p>e. For Audit Qualification(s) where the impact is not quantified by the auditor:</p> <p>(i) Management's estimation on the impact of audit qualification:</p> <p>(ii) If management is unable to estimate the impact, reasons for the same:</p> <p>(iii) Auditors' Comments on (i) or (ii) above:</p>	<p><i>NA</i></p>
<p>a. Audit Qualification (each audit qualification separately):</p>	<p><i>The company has a Stock of Rs 923.09 Lacs as of 30.09.2023, but we are uncertain about the existence and fair valuation of inventory due to the absence of a physical verification report. Alternative audit procedures were employed, but they do not provide the same level of assurance as physical verification. Management's responsibility for valuation is acknowledged, but the lack of a physical verification report introduces inherent uncertainty in inventory balances.</i></p>
<p>b. Type of Audit Qualification</p>	<p><i>Qualified Conclusion</i></p>
<p>c. Frequency of qualification</p>	<p><i>Appeared for the first time</i></p>
<p>d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:</p>	<p><i>The responsibility of management for the valuation of inventory is understood and accepted. We are committed to ensuring that our internal processes align with best practices, and we take this responsibility seriously. While we regret the absence of the physical verification report we want to assure you that alternative measures were taken</i></p>


	<i>verification will be carried out promptly, and the result will be documented in a comprehensive report. To mitigate the risk associated with the absence of a physical verification report, we are implementing enhanced controls to ensure the accuracy and completeness of inventory reporting in future periods.</i>
<p>e. For Audit Qualification(s) where the impact is not quantified by the auditor:</p> <p>(i) Management's estimation on the impact of audit qualification:</p> <p>(ii) If management is unable to estimate the impact, reasons for the same:</p> <p>f. (iii) Auditors' Comments on (i) or (ii) above:</p>	NA
<p>a. Audit Qualification (each audit qualification separately):</p>	<i>We bring to attention a significant matter related to the provision for income tax outstanding of an Amounting of Rs 94.45 Lacs, where tax payments have been made as per income tax returns filed with the Income tax department over the past three years but corresponding entries have not been recorded in the books of account. While the company has met its tax obligations, the absence of proper accounting entries raises concerns about the accuracy and completeness of the financial records. This departure from standard accounting practices could impact the reported financial position and income. Accurate tax liabilities still outstanding as of the end of the review period could not be ascertained.</i>
b. Type of Audit Qualification	<i>The auditor drew the attention to aforementioned point.</i>
c. Frequency of qualification	<i>Appeared for the first time.</i>
d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:	<i>We acknowledge the observation regarding an outstanding amount of Rs 94.45 Lacs related to income tax. As mentioned in your report, the company has duly made tax payments in accordance with the income tax returns filed with the Income Tax Department over the past three years. However, we recognize the discrepancy in not recording corresponding entries in our books of account. We understand the importance of accurate and complete accounting practices and take this matter seriously. We want to assure you that we are taking immediate steps to rectify this discrepancy. Our team is in the process of reconciling the tax payments with the books of account, ensuring that all necessary entries are accurately recorded. This will not only address the concerns raised but will also contribute to the overall accuracy and completeness of our financial records. We are committed to ensuring that our financial statements reflect a true and fair view of the company's financial position.</i>
<p>e. For Audit Qualification(s) where the impact is not quantified by the auditor:</p> <p>(i) Management's estimation on the</p>	NA



<b>(iii) Auditors' Comments on (i) or (ii) above:</b>	
<b>a. Audit Qualification (each audit qualification separately):</b>	<i>We highlight a material concern regarding the non-payment of certain statutory dues by the company. As on 30.09.2023, payments for Tax Deducted at Source (TDS) of Rs 5.37 Lacs and Tax Collected at Source (TCS) of Rs 2.6 Lacs remain outstanding, creating a significant financial obligation. This non-compliance with statutory obligation may have legal and financial repercussions. While management has provided assurances of imminent resolution, the uncertainty surrounding the timing and completeness of these payments poses a risk to the financial statements.</i>
<b>b. Type of Audit Qualification</b>	<i>The auditor drew the attention to aforementioned point.</i>
<b>c. Frequency of qualification</b>	<i>Appeared for the first time.</i>
<b>d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:</b>	<i>There is no undisputed amount payable in respect of an statutory liability except of a few GST/TDS/TCS balances which shall be paid on or before 31st December 2023.</i>
<b>f. For Audit Qualification(s) where the impact is not quantified by the auditor:</b>  <b>(i) Management's estimation on the impact of audit qualification:</b>  <b>(ii) If management is unable to estimate the impact, reasons for the same:</b>	NA
<b>e. (iii) Auditors' Comments on (i) or (ii) above:</b>	
<b>a. Audit Qualification (each audit qualification separately):</b>	<i>We note the company is not maintaining books of account in software having Edit Log feature. Absence of an Edit log in the company's accounting software as prescribed under Rule 3(1) of the Companies (Accounts) Rules, 2014 for the review period, limiting our ability to independently verify changes to financial records. The lack of an edit log poses the lack of robust controls for financial transparency and compliance with statutory provisions of the Companies Act, 2013.</i>
<b>b. Type of Audit Qualification</b>	<i>The auditor drew the attention to aforementioned point.</i>
<b>c. Frequency of qualification</b>	<i>Appeared for the first time.</i>
<b>d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:</b>	<i>We acknowledge the importance of the Edit Log feature in ensuring transparency and compliance with statutory provisions. We want to assure you that we take this matter seriously and are committed to addressing the deficiency promptly. Recognizing the significance of robust controls for financial transparency, we are reviewing our current accounting software and exploring options to implement an Edit Log feature as prescribed by the regulatory framework. The absence of an Edit Log poses challenges to independent verification of changes to financial records, and we recognize the importance of remedying this situation. The management team is actively working on enhancing our internal controls to ensure not only compliance with statutory requirements but also</i>

<p><b>g. For Audit Qualification(s) where the impact is not quantified by the auditor:</b></p> <p><b>(i) Management's estimation on the impact of audit qualification:</b></p> <p><b>(ii) If management is unable to estimate the impact, reasons for the same:</b></p> <p><b>e. (iii) Auditors' Comments on (i) or (ii) above:</b></p>	<p><i>support your audit processes in the subsequent review period.</i></p> <p>NA</p>
<p><b>a. Audit Qualification (each audit qualification separately):</b></p>	<p><i>During the review period it was observed that the Company is doing substantial transactions of sales and purchases with related parties, The Management was not able to provide Compliance Documents with respect to Section 188 of The Companies Act, 2013 for transactions entered with related parties.</i></p>
<p><b>b. Type of Audit Qualification</b></p>	<p><i>Qualified Opinion</i></p>
<p><b>c. Frequency of qualification</b></p>	<p><i>The auditor drew the attention to aforementioned point.</i></p>
<p><b>d. For Audit Qualification(s) where the impact is quantified by the auditor, Management's Views:</b></p>	<p><i>We understand the importance of compliance with Section 188 of The Companies Act, 2013, particularly concerning transactions with related parties. The Management is actively working on compiling the necessary compliance documents for the related party transactions. We understand the urgency and are committed to providing the required documents promptly to meet regulatory standards. Additionally, we would like to confirm that the Company has made advances to certain parties in the ordinary course of business. To address this, the appropriate agreements related to these advances will be furnished to the Auditor on or before 31st December 2023.</i></p>
<p><b>h. For Audit Qualification(s) where the impact is not quantified by the auditor:</b></p> <p><b>(i) Management's estimation on the impact of audit qualification:</b></p> <p><b>(ii) If management is unable to estimate the impact, reasons for the same:</b></p> <p><b>e. (iii) Auditors' Comments on (i) or (ii) above:</b></p>	<p>NA</p>

Signatories:

• CEO/Managing Director	<i>Chauhan</i>
• CFO	<i>Rohit</i>
• Audit Committee Chairman	<i>Vishal</i>
• Statutory Auditor	

Place: Jaipur

Date: 25.11.2023