

## SWAGTAM TRADING & SERVICES LIMITED

Regd. Office: R-489, GF-A, New Rajinder Nagar, New Delhi – 110060

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CIN: L51909DL1984PLC289131

Annexure-2

12.07.2021

Sub: Non-Applicability of Disclosure under Regulation 23(9) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Disclosure of Related Party Transactions on a consolidated basis

Dear Sir,

With reference to the captioned subject, we inform that pursuant to regulation 15(2) of the SEBI (LODR) Regulations, 2015 and the provisions of Regulation 23(9) of the SEBI (LODR) Regulations, 2015 as amended, is **NOT APPLICABLE** to the Company as the Paid up Share Capital is less than Rs. 10 Crores and Net Worth is less than Rs. 25 Crores as on 31.03.2021.

As per Regulation 15(2) of the SEBI(LODR) Regulations, 2015 the compliance with the Corporate Governance provisions as specified in Regulations 17, 17A, 18, 19, 20, 21, 22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub regulation 2 of Regulation 46 and Para C, D and E of Schedule V shall not apply, in respect of the listed entity, having Paid-Up Equity Share Capital not exceeding Rs Ten Crore and Net Worth not exceeding Rs Twenty Five Crores, as on the last day of the previous financial year.

Please take note that as per the latest Audited Accounts of the Company as at March 31, 2021, the paid up equity share capital is Rs. 1,19,05,000/- and Reserves & Surplus is 3,00,54,359/- and net worth is Rs. 4,19,59,359/- which is below the Threshold Limit as specified under the said regulation.

Hence, we are given to understand that the Company is not required to submit "Disclosures of the 'Related Party Transactions' on a consolidated basis as per Regulation 23(9) of SEBI(LODR) Regulations, 2015."

Moreover, we hereby state & confirm that **THERE ARE NO RELATED PARTY TRANSACTIONS** which are not on arms length basis and not in the normal & ordinary course of business.

Therefore, Regulation 15(2) and provision of Regulation 23(9) of the SEBI (LODR) Regulations, 2015, are **NOT APPLICABLE** to our Company.

We further undertake & confirm that, whenever this regulation becomes applicable to the Company at a later date, we shall undertake to comply with regulation 23(9) of SEBI (LODR) Regulations, 2015 within six months from the date on which the provisions became applicable to the Company.

For SWAGTAM TRADING AND SERVICES LIMITED

For Swagtam Trading & Services Ltd.

*Preetika Mishra*

PREETIKA MISHRA Company Secretary  
Company Secretary, ACS-32490