

# SWAGTAM TRADING & SERVICES LIMITED

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

Tel : 011-42475489 E-mail : [swagtam1984@gmail.com](mailto:swagtam1984@gmail.com) Website : [www.swagtam.com](http://www.swagtam.com)

CIN: L51909DL1984PLC289131

1) All Shareholders	7) M/s G. K. KEDIA & CO., Statutory Auditors
2) BSE Ltd.	8) NSDL
3) Calcutta Stock Exchange Ltd.	9) CDSL
4) All Board Members	10) B. BHUSHAN & CO., Secretarial Auditors
5) All Promoters	11) MITTAL JINDAL & ASSOCIATES., Internal Auditors
6) RTA – Alankit Assignments Ltd	

SUB : QUARTER ENDED 31<sup>ST</sup> DECEMBER 2023

Respected Sir / Madam,

21-01-2024

We submit & enclose the following Quarterly Compliances for the Quarter ended 31-DEC-23

- 1). RECONCILIATION OF SHARE CAPITAL AUDIT REPORT issued by PCS ( Reg 76 )
- 2). MCA – Company Master Data print-out
- 3). CORPORATE GOVERNANCE REPORT – regulation 27(2) of SEBI (LODR)
- 4). Disclosures under Regulation 13(3) of SEBI (LODR) Regulations 2011  
INVESTORS' COMPLAINTS STATUS alongwith SCORES Report
- 5). Structured Digital Database (SDD) - Compliance Certificate under Regulation 3(5) and 3(6) of SEBI – Prohibition of Insider Trading Regulations, 2015 (PIT Regulations)
- 6). Certificate u/r 74(5) of SEBI (Depository and Participants) Regulations, 2018  
– issued by RTA: Alankit Assignments
- 7). Reg. 32 of SEBI (LODR) Regulations, 2015 i.e. (Statement of Deviation or Variation for proceeds of public issue, rights issue, preferential issue, QIP) is NOT APPLICABLE  
Encl : Annexure-1
- 8). NON-APPLICABILITY of Disclosure under Regulation 23(9) of SEBI LODR Regulations, 2015 - Disclosure of Related Party Transactions on a consolidated basis Encl : Annexure-2
- 9). UNDERTAKING : This is to inform that website of the Company - [www.swagtam.com](http://www.swagtam.com) is Active, Updated Regularly and Functional as per Reg. 46 of SEBI (LODR) Reg, 2015.
- 10). Certificate as per Reg. 57(5) of SEBI (LODR) Regulations, 2015:  
Company has not issued any type or kind of 'non-convertible securities' during or before this quarter therefore obligations for payment of or unpaid interest/dividend/principal in relation to non-convertible securities at the end of the quarter is NOT APPLICABLE
- 11). SHARE - HOLDING PATTERN - Reg 31 SEBI(LODR) as at 31.12.2023

Kindly Advise if we have to submit any other information, papers, documents, etc  
Kindly take it on Records, do the Needful & oblige.

For SWAGTAM TRADING AND SERVICES LIMITED

For SWAGTAM TRADING & SERVICES LIMITED

SUMIT GUPTA

Director, DIN No. 06911742

Director/ Auth. Sign

ENCL: AS ABOVE

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Annexure-1

21-01-2024

SUB : Non-applicability Declaration of Reg. 32 of SEBI (LODR) Regulations, 2015  
(Statement of Deviation or Variation for proceeds of public issue, rights issue,  
preferential issue, QIP)

Dear Sir/Madam,

Pursuant to the Regulation 32 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company hereby confirms, that there has been NO deviation(s) or variation(s) in the use of the public issue proceeds raised from the Initial Public Offer (IPO).

We further confirm that during the last 3 Financial Years,  
there is No Change in Share Capital:

- o Buy Back of Securities : Company has not bought back any of its securities.
- o Sweat Equity Shares : Company has not issued any Sweat Equity Shares.
- o Bonus Shares : No Bonus Shares were issued during the year.
- o Public Issue, Rights Issue, Preferential Issue, QIP, Preference Shares/ Debentures :  
Company has not issued any Public Issue, Rights Issue,  
Preferential Issue, QIP, Preference Shares/ Debentures, etc.
- o Employees Stock Option Plan : Company has not provided any Stock Option Scheme.

Hence, the Reg. 32 of SEBI (LODR) Regulations, 2015 i.e. (Statement of Deviation or Variation for proceeds of public issue, rights issue, preferential issue, QIP) is  
NOT APPLICABLE to the Company.

We request you to kindly take note of this information on your record and acknowledge.

Kindly advise if we have to submit any other information, papers, documents, etc  
Kindly take it on record, do the needful & oblige.

For SWAGTAM TRADING AND SERVICES LIMITED

  
SUMIT GUPTA  
Director, DIN No. 06911742

Director/ Auth. Sign

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## Annexure-2

21-01-2024

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/Madam,

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 31.03.2023

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 i.e. 31.03.2023

Please take note that as per the latest Audited Accounts of the Company as at March 31, 2023, the Paid Up Equity Share Capital is Rs. 1,19,05,000/- and Reserves & Surplus is 3,27,89,980/- and Net Worth is Rs.4,46,94,980/- 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

SUMIT GUPTA  
Director, DIN No. 06911742

Director/Auth. Sign