



# SANCHAY FINVEST LTD.

806, Dev Plaza, 68, S. V. Road, Andheri (West), Mumbai - 400 058.

Tel. : 2620 5500, 2671 6288 Fax : 2620 6072

E-mail : sanchayfin21@hotmail.com

Member : National Stock Exchange of India Ltd.

Date : September 06, 2022

To  
Department of Corporate Services,  
BSE Limited  
25<sup>th</sup> Floor,  
PhirozeJeejeebhoy Towers,  
Dalal Street, Mumbai - 400 001.

**BSE CODE: 511563**

**SUBJECT: ANNUAL REPORT FOR FY 2021-22, NOTICE OF 31<sup>ST</sup> ANNUAL GENERAL MEETING ("AGM")**

As required under Regulation 30 and Regulation 34 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), we submit herewith the Annual Report of the Company for the Financial Year 2021-22 along with the Notice convening the 31st Annual General Meeting scheduled to be held on Thursday, September 29, 2022 at 2:00 P.M.. (IST) at the registered office of the company i.e. 209, Rajani Bhuvan, 569 M.G. Road Indore Madhya Pradesh 452001.

In compliance with above mentioned circulars, the Annual Report of the Company for the Financial Year 2021-22 along with the Notice convening the 31st Annual General Meeting has been sent in electronic mode to Members whose email IDs are registered with the Company or the Depository Participant(s).

In compliance with Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014, as amended from time to time, Regulation 44 of the Listing Regulations and Secretarial Standard - 2 on General Meetings issued by The Institute of Company Secretaries of India, the Company is providing the facility to Members to exercise their right to vote by electronic means on Resolutions proposed to be passed at AGM. The Company has engaged CDSL for providing facility for voting through remote e-Voting, for participation in the AGM and e-Voting during the AGM. The Register of Members and the Share Transfer books of the Company will remain closed from Friday, September 23, 2022 to Thursday, September 29, 2022 (both days inclusive).

### **Key information:**

Cut-off Date	Thursday, September 22, 2022
Day, Date and time of commencement of remote e-Voting	Monday, September 26, 2022 at 9:00 a.m.
Day, Date and time of end of remote e-Voting	Wednesday, September 28, 2022 at 5:00 p.m.
Annual General Meeting	Thursday, September 29, 2022





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Tel. : 2620 5500, 2671 6288 Fax : 2620 6072

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Member : National Stock Exchange of India Ltd.

The copy of the Notice of AGM and Annual Report is also available on the Website of the Company [www.sanchayinvest.in](http://www.sanchayinvest.in) and on the website of the Stock Exchange i.e., BSE limited at [www.bseindia.com](http://www.bseindia.com) and on the CDSL website at [www.evotingindia.com](http://www.evotingindia.com)

Kindly acknowledge and take on record the same.

Thanking you,

For SanchayFinvest Limited,



Naresh Kumar Nandlal Sharma  
Managing Director  
(DIN: 00794218)

SANCHAY FINVEST LIMITED  
31st ANNUAL REPORT  
2021-22

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## CORPORATE INFORMATION

## 1. Board of Directors

1. NIKHIL SARAN MATHUR	- Director	00192195
2. NAROTTAM KUMAR NANDLAL SHARMA	- Director	00794167
3. NARESH KUMAR NANDLAL SHARMA	- Managing Director	00794218
4. SURESHKUMAR NANDLAL SHARMA	- Director	00873851
5. VINITA NARESH SHARMA	- Women Director	07152632
6. NEHA MILAN SHAH	- Company Secretary & CFO	
7. SARTHAK NARESH SHARMA	- Director	08239430

## 2. Registered Office

209, RAJANI BHUVAN, 569M.G. ROAD  
INDORE MP 452001 IN

## 3. Statutory Auditors

V.R.BHABHRA & CO, CHARTERED  
ACCOUNTANTS (FRN No.112861W)  
303, Sagar Shopping Center, 76 J.P.  
Road, Opp. Bombay Bazar, Andheri  
(West), Mumbai - 400 058.

## 4. Secretarial Auditor

Ramesh Chandra Mishra & Associates  
129-B, Ansa Industrial Estate, Sakivihar Road,  
Sakinakka, Andheri (East), Mumbai-400072  
(M.S.)

## 4. Bankers

## 5. Registrar &amp; Transfer Agents

Ankit Consultancy Pvt. Ltd.,  
60, Electronic Complex,  
Pardeshipura, Indore (M.P.) 452010

## 6. Listed at

BSE Limited

7. Demat ISIN No. In  
NSDL & CDCL

INE654D01010

## 8. Website

<http://www.sanchayinvest.in>

## 9. E.mail Id

sanchaay@gmail.com

## 10. Corporate Identity No.

L67120MP1991PLC006650



## NOTICE

**NOTICE** is hereby given that the Thirty First Annual General Meeting of the members of Sanchay Finvest Limited will be held on Thursday, September 29, 2022 at 2:00 p.m. at the registered office of the company at 209, RAJANI BHUVAN, 569M.G. ROAD INDORE Indore MP., to transact the following businesses:

### **ORDINARY BUSINESS:**

1. To consider and adopt the audited financial statement of the Company for the financial year ended March 31, 2022 and the reports of the Board of Directors and Auditors thereon; in this regard, to consider and if thought fit, to pass, with or without modification(s), the following resolutions as Ordinary Resolutions:

**"RESOLVED THAT** the audited financial statement of the Company for the financial year ended March 31, 2022 and the reports of the Board of Directors and Auditors thereon, as circulated to the members, be and are hereby considered and adopted."

2. To appoint Auditors and fix their remuneration:

To re-appoint the auditors of the Company and to fix their remuneration and to pass the following resolution as an Ordinary Resolution:

**"RESOLVED THAT** pursuant to Section 139, 142 and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder, pursuant to the recommendations of the audit committee to the Board of Directors, and pursuant to the resolution passed by the members at the AGM held in 2017 the appointment of M/s. V. R. Bhabhra & Co, Chartered Accountants, (Firm Registration No. 112861W) as the Auditors of the Company to hold office till the conclusion of the AGM to be held in the calendar year 2022, be and is hereby re-appointed for 2<sup>nd</sup> term i.e. 5 consecutive years starting from the conclusion of 31st AGM to 36th AGM to be held in the calendar year 2017 and that the Board of Directors be and is hereby authorized to fix the remuneration payable to auditor as may be determined by the Audit Committee in consultation with the auditors, and that such remuneration may be paid on a progressive billing basis as may be agreed upon between the Auditors and the Board of Directors."

**Special Businesses:**3. Re-Appointment of Mr. **Naresh Kumar Sharma** (DIN: 00794218) - as Managing Director.

To consider and if thought fit, pass with or without modification(s), following resolution as Special Resolution:

“RESOLVED THAT pursuant to the provisions of Sections 196, 197, 203 and any other applicable provisions, if any, read along with Schedule V of the Companies Act, 2013 („Act”) and the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, as amended from time to time, the consent of the Members be and is hereby accorded to the re-appointment and terms of remuneration of Mr. Naresh Kumar Sharma (DIN: 00794218) as Managing Director of the Company for a period of three years, with effect from 1st October 2022, not liable to retire by rotation, upon the terms and conditions set out in the Statement annexed to the Notice convening this Meeting, including the remuneration to be paid in the event of loss or inadequacy of profits in any financial year during his said tenure within the overall limits of Section 197 of the Companies Act, 2013 with liberty to the Board of Directors to alter and vary the terms and conditions of the said appointment and terms of remuneration as it may deem fit and in such manner as may be agreed to between the Board and the MD.”

“RESOLVED FURTHER THAT in the event of loss or inadequacy of profits in any financial year during the period of Mr. Sharma’s appointment, he will be paid or provided the salary, the allowances, and the perquisites as set out in the foregoing part of this resolution as the „Minimum Remuneration”.”

“AND RESOLVED FURTHER THAT the Board of Directors (the „Board” which term includes a duly constituted Committee of the Board) be and is hereby authorised to take all such steps as may be necessary, proper and expedient to give effect to this Resolution.”

Dated : 30-08-2022

For and on behalf of Board of Directors

Sd/-

**Naresh Kumar Sharma**  
**Managing Director**  
**DIN: 00794218**

Place : INDORE

**Registered Office:**

209, RAJANI BHUVAN, 569M.G. ROAD INDORE MP 452001 IN

E-mail: [sanchaay@gmail.com](mailto:sanchaay@gmail.com)

Website: <http://www.sanchayinvest.in>

**NOTES:**

- (a) Subject to and in accordance with relaxation provided by the government in the wake of COVID-19 pandemic, the Company is holding AGM in physical mode.
- (b) A MEMBER ENTITLED TO ATTEND AND VOTE AT THE MEETING IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE INSTEAD OF HIMSELF / HERSELF AT THE VENUE OF THE MEETING AND SUCH PROXY NEED NOT BE A MEMBER OF THE COMPANY. The proxies to be effective should be deposited at the registered office of the Company not less than forty-eight (48) hours before the commencement of the meeting and in default, the instrument of proxy shall be treated as invalid. Proxies submitted on behalf of the companies, societies etc., must be supported by an appropriate resolution / authority, as applicable. A person can act as a proxy on behalf of members not exceeding 50 and holding in aggregate not more than 10% of the total share capital of the Company carrying voting rights. Accordingly, the facility for appointment of proxies by the Members will be available for the AGM and hence the Proxy Form and Attendance Slip are annexed to this Notice.
- (c) In the case of Corporate Member, it is requested to send a scanned copy of the Board Resolution/Authorization authorizing the representative to attend the AGM physically and vote on its behalf at the meeting. The said Resolution / Authorization shall be sent to the Company Secretary by email through its registered email address to [sanchaay@gmail.com](mailto:sanchaay@gmail.com)
- (d) The Route Map is annexed in this Notice. The proceedings of the AGM shall be deemed to be conducted at the Registered Office of the Company.



- (e) 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, and Regulation 44 of the LODR Regulations, the Company has extended e-voting facility for its members to enable them to cast their votes electronically on the resolutions set forth in this notice. The instructions for e-voting are provided in this notice. The e-voting commences on Monday, September 26, 2022 at 9:00 a.m.(IST) and end on Wednesday, September 28, 2022 at 5:00 p.m.(IST). The voting rights of the Shareholders shall be in proportion to their shares of the paid up equity share capital of the Company as on the cut-off date, i.e., Thursday, September 22, 2022.
- (f) Any person who is not a member post cut-off date should treat this notice for information purposes only.
- (g) A person, whose name is recorded in the Register of Members or in the Register of Beneficial Owners maintained by the depositories as on the cut-off date only shall be entitled to avail the facility of remote e-voting as well as voting at the AGM.
- (h) Any person, who acquires shares and becomes a Member of the Company after sending the notice and holding shares as of the cut-off date, i.e., Thursday, September 22, 2022, may obtain the login ID and password by sending a request at [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or to the Registrar and Share Transfer Agent (RTA) [ankit\\_4321@yahoo.com](mailto:ankit_4321@yahoo.com). However, if he/she is already registered with Central Depository Services (India) Limited (CDSL) for remote e-voting then he/she can use his/her existing User ID and password for casting the vote.
- (i) CS Ramesh Chandra Mishra, Practising Company Secretary (Membership No. FCS 5477 CP No. 3987) from M/s Ramesh Chandra Mishra & Associates, vide Board Resolution dated August 30, 2022 has been appointed as the Scrutinizer to scrutinize the voting and e-voting process in a fair and transparent manner.



- (j) The Scrutinizer shall within a period not exceeding 2 (Two) working days from the conclusion of the e-voting period unblock the votes in the presence of at least 2 (Two) witnesses not in the employment of the Company and make a Scrutinizer's report of the votes cast in favour or against, if any, forthwith to the Chairman of the Company or a person authorised by him in writing.
- (k) The Results shall be declared after the AGM of the Company. The Results declared along with the Scrutinizer's Report shall be placed on the Company's website viz. <http://www.sanchayinvest.in> and on the website of CDSL within 2 (Two) working days of passing of the resolutions at the AGM of the Company and the same will also be communicated to the Stock Exchanges.
- (l) To support the 'Green Initiative', Members who have not yet registered their email addresses are requested to register the same with their Depository Participants (DPs) in case the shares are held by them in electronic form and with RTA in case the shares are held by them in physical form.
- (m) Members are requested to intimate changes, if any, pertaining to their name, postal address, email address, telephone/ mobile numbers, Permanent Account Number (PAN), mandates, nominations, power of attorney, bank details such as, name of the bank and branch details, bank account number, MICR code, IFSC code, etc., to their Depository Participants
- (n) In compliance with the aforesaid MCA Circulars and SEBI Circular, Notice of the AGM along with the Annual Report 2021-22 is being sent only through electronic mode to those Members whose email addresses are registered with the Company/ RTA/ Depositories. Members may note that the Notice and Annual Report 2021-22 will also be available on the Company's website <http://www.sanchayinvest.in>, websites of the Stock Exchange i.e. BSE Limited at [www.bseindia.com](http://www.bseindia.com) and on the website of CDSL at <https://helpdesk.evoting@cdslindia.com>. The Company will also be publishing an advertisement in newspaper containing the details about the AGM, date and time of AGM, availability of notice of AGM at the Company's website, manner of registering the email IDs of those shareholders who have not registered their email addresses with the Company/ RTA and other matters as may be required.
- (o) Members attending the AGM shall be counted for the purpose of reckoning the quorum under Section 103 of the Act.
- (p) In case of joint holders, only one of the members whose name appears the Register of Members of the Company will be entitled to vote in respect of the resolutions proposed at the AGM.

- (r) Pursuant to Section 91 of the Act, the Register of Members of the Company will remain closed from Friday, September 23, 2022 to Thursday, September 29, 2022 (both the days inclusive).
- (s) The Registers maintained under Section 170 & 189 of the Act, and the relevant documents referred to in the Notice will be available electronically for inspection till the conclusion of AGM by the members based on the request being sent on [nutricirclelimited@gmail.com](mailto:nutricirclelimited@gmail.com).
- (t) Member(s) must quote their Folio Number/ DP ID & Client ID and contact details such as email address, contact no. etc. in all correspondences with the Company/ RTA.
- (u) As per Regulation 40 of LODR Regulations, as amended, securities of listed companies can be transferred only in dematerialized form with effect from April 1, 2019, except in case of request received for transmission or transposition of securities. In view of this and to eliminate all risks associated with physical shares and for ease of portfolio management, members holding shares in physical form are requested to consider converting their holdings to dematerialized form. Members can contact the RTA for assistance in this regard.
- (v) In case of joint holders, 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 entitled to vote at the AGM.
- (w) Pursuant to the provisions of Section 72 of the Act the Member(s) holding shares in physical form may nominate, in the prescribed manner, any person to whom all the rights in the shares shall vest in the event of death of the sole holder or all the joint holders. A nomination form for this purpose is available with the Company or its RTA. Member(s) holding shares in demat form may contact their respective DPs for availing this facility.
- (x) Member(s) holding shares in physical form is/ are requested to notify immediately any change of their respective addresses and bank account details. Please note that request for change of address, if found incomplete in any respect shall be rejected. Members holding shares in demat form are requested to notify any change in their addresses, e-mails and/or bank account mandates to their respective DPs only and not to the Company/ RTA for effecting such changes. The Company uses addresses, e-mails and bank account mandates furnished by the Depositories for updating its records of the Shareholders holding shares in electronic/demat form.



**THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING:**

Members are requested to carefully read the instructions printed on the Form, record your assent (for) or dissent (against) through e-voting.

**The way to vote electronically on CDSL e-Voting system consists of "Two Steps" which are mentioned below: ANNUAL REPORT 2021-22**

In terms of SEBI circular dated December 09, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

The Company is pleased to offer e-voting facility to all its members to enable them to cast their vote electronically in terms of Section 108 of the Companies Act, 2013 read with the Companies (Management and Administration) Rules, 2014 and as per listing agreement (including any statutory modification or re-enactment thereof for the time being in force). Accordingly, a member may exercise his vote by electronic means and the Company may pass any resolution by electronic voting system in accordance with the below provisions, through the e-voting services provided by CDSL.

1. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and MCA Circulars dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-voting to its Members in respect of the business to be transacted at the AGM. For this purpose, the Company has entered into an agreement with Central Depository Services (India) Limited (CDSL) for facilitating voting through electronic means, as the authorized e-Voting's agency.

The facility of casting votes by a member using remote e-voting will be provided by CDSL.

2. The Members can join the AGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the AGM through VC/OAVM will be made available to at least 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the



Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the AGM without restriction on account of first come first served basis.

3. The attendance of the Members attending the AGM will be counted for the purpose of ascertaining the quorum under Section 103 of the Companies Act, 2013.
4. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the AGM has been uploaded on the website of the Company at <http://www.sanchayinvest.in>. The Notice can also be accessed from the websites of the Stock Exchanges i.e. BSE Limited at [www.bseindia.com](http://www.bseindia.com) and [www.evotingindia.com](http://www.evotingindia.com) respectively. The AGM Notice is also disseminated on the website of CDSL (agency for providing the Remote e-Voting facility and e-voting system during the AGM) i.e. [www.evotingindia.com](http://www.evotingindia.com).

#### **THE INTRUCTIONS OF SHAREHOLDERS FOR REMOTE E-VOTING:**

- (i) The voting period begins on Monday, September 26, 2022 at 9:00 a.m.(IST) and end on Wednesday, September 28 , 2022 at 5:00 p.m.(IST). During this period shareholders' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date (record date) of Thursday, September 22, 2022 may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Pursuant to SEBI Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated 09.12.2020, under Regulation 44 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 , listed entities are required to provide remote e-voting facility to its shareholders, in respect of all shareholders' resolutions. However, it has been observed that the participation by the public non- institutional shareholders/retail shareholders is at a negligible level.

Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.

In order to increase the efficiency of the voting process, pursuant to a public consultation, it has been decided to enable e-voting to all the demat account holders, by way of a single login credential, through their demat accounts/ websites of Depositories/ Depository Participants. Demat account holders would be able to cast their vote without having to register again with the ESPs, thereby, not only facilitating seamless authentication but also enhancing ease and convenience of participating in e-voting process.

- (iv) In terms of SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Pursuant to above said SEBI Circular, Login method for e-Voting and joining virtual meetings for Individual shareholders holding securities in Demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in Demat mode with CDSL	<ol style="list-style-type: none"> <li>1) Users who have opted for CDSL Ease / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are <a href="https://web.cdslindia.com/myeasi/home/login">https://web.cdslindia.com/myeasi/home/login</a> or visit <a href="http://www.cdslindia.com">www.cdslindia.com</a> and click on Login icon and select New System Myeasi.</li> <li>2) After successful login the easy / Easiest user will be able to see the e-Voting option for eligible companies where the evoting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers i.e. CDSL/NSDL/KARVY/LINKINTIME, so that the user can visit the e-Voting service providers' website directly.</li> </ol>

	<p>3) If the user is not registered for Easi/Easiest, option to register is available at <a href="https://web.cdslindia.com/myeasi/Registration/EasiRegistration">https://web.cdslindia.com/myeasi/Registration/EasiRegistration</a></p> <p>4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on <a href="http://www.cdslindia.com">www.cdslindia.com</a> home page. The system will authenticate the user by sending OTP on registered Mobile &amp; Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.</p>
<p>Individual Shareholders holding securities in demat mode with NSDL</p>	<p>1) If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the following URL: <a href="https://eservices.nsd.com">https://eservices.nsd.com</a> either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting.</p> <p>2) If the user is not registered for IDeAS e-Services, option to register is available at <a href="https://eservices.nsd.com">https://eservices.nsd.com</a>. Select "Register Online for IDeAS "Portal or click at <a href="https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp">https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp</a></p> <p>3) Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <a href="https://www.evoting.nsd.com/">https://www.evoting.nsd.com/</a> either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e.</p>



	<p>your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on 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 or joining virtual meeting &amp; voting during the meeting</p>
<p>Individual Shareholders (holding securities in demat mode) login through their Depository Participants</p>	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, 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. Click on 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 or joining virtual meeting &amp; voting during the meeting.</p>

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

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

Login type	Helpdesk details
<p>Individual Shareholders holding securities in Demat mode with CDSL</p>	<p>Members facing any technical issue in login can contact CDSL helpdesk by sending a request at <a href="mailto:helpdesk.evoting@cdslindia.com">helpdesk.evoting@cdslindia.com</a> or contact at 022-23058738 and 22-23058542-43.</p>
<p>Individual Shareholders holding securities in Demat mode with NSDL</p>	<p>Members facing any technical issue in login can contact NSDL helpdesk by sending a request at <a href="mailto:evoting@nsdl.co.in">evoting@nsdl.co.in</a> or call at toll free no.: 1800 1020 990 and 1800 22 44 30</p>

- (v) Login method for e-Voting and joining virtual meeting for shareholders other than individual shareholders holding in Demat form & physical shareholders.



- 1) The shareholders should log on to the e-voting website [www.evotingindia.com](http://www.evotingindia.com).
- 2) Click on "Shareholders" module.
- 3) Now enter your User ID
  - a. For CDSL: 16 digits beneficiary ID,
  - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
  - c. Shareholders holding shares in Physical Form should enter Folio Number registered with the Company.
- 4) Next enter the Image Verification as displayed and Click on Login.
- 5) If you are holding shares in demat form and had logged on to [www.evotingindia.com](http://www.evotingindia.com) and voted on an earlier e-voting of any company, then your existing password is to be used.
- 6) If you are a first-time user follow the steps given below:

	For Shareholders holding shares in Demat Form other than individual and Physical Form
PAN	<p>Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders)</p> <ul style="list-style-type: none"> <li>• Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.</li> </ul>
Dividend Bank Details OR Date of Birth (DOB)	<p>Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login.</p> <ul style="list-style-type: none"> <li>• If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field as mentioned in instruction (v).</li> </ul>

- (vi) After entering these details appropriately, click on "SUBMIT" tab.
- (vii) Shareholders holding shares in physical form will then directly reach the Company selection screen. However, shareholders holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- (viii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (ix) Click on the **EVSN – 220903023** for the relevant "**Sanchay Finvest Limited**" on which you choose to vote.
- (x) On the voting page, you will see "RESOLUTION DESCRIPTION" and against the same the option "YES/NO" for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- (xi) Click on the "RESOLUTIONS FILE LINK" if you wish to view the entire Resolution details.
- (xii) After selecting the resolution, you have decided to vote on, click on "SUBMIT". A confirmation box will be displayed. If you wish to confirm your vote, click on "OK", else to change your vote, click on "CANCEL" and accordingly modify your vote.
- (xiii) Once you "CONFIRM" your vote on the resolution, you will not be allowed to modify your vote.
- (xiv) You can also take a print of the votes cast by clicking on "Click here to print" option on the Voting page.
- (xv) If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.

- (xvi) Facility for Non – Individual Shareholders and Custodians – Remote Voting
- a. Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to [www.evotingindia.com](http://www.evotingindia.com) and register themselves in the “Corporates” module.
  - b. A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com).
  - c. After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
  - d. The list of accounts linked in the login should be mailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) and on approval of the accounts they would be able to cast their vote.
  - e. A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
  - f. Alternatively Non Individual shareholders are required to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; [nutricirclelimited@gmail.com](mailto:nutricirclelimited@gmail.com), if they have voted from individual tab & not uploaded same in the CDSL e-voting system for the scrutinizer to verify the same.

**Manner of Registering and/ or Updating Email address:**

- ✓ With a view to send Notice and Annual Report of the ensuing AGM, and other communications for the year ended March 31, 2022, In electronic form, shareholders of **SANCHAY FINVEST LIMITED** holding shares in dematerialized form, who have not yet registered their E-mail ID are requested to register/update the same with the Depository through their Depository Participants.
- ✓ Shareholders holding shares in physical form and dematerialized form, can register their E-mail ID by visiting [www.ankitonline.com](http://www.ankitonline.com) of Ankit Consultancy Pvt. Ltd

(RTA), Registrar & Share Transfer Agent of the 2nd Floor Alankar Point, Gita Bhavan Chouraha, A.B. Road, Indore, Madhya Pradesh, 452010. The Shareholders are requested to provide details such as Name, Folio Number, E-mail Id along with phone number.

If you have any queries or issues regarding attending AGM & e-Voting from the CDSL e-Voting System, you can write an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or contact at 022- 23058738 and 022-23058542/43.

All grievances connected with the facility for voting by electronic means may be addressed to Mr. Rakesh Dalvi, Sr. Manager, (CDSL, ) Central Depository Services (India) Limited, A Wing, 25th Floor, Marathon Futurex, Mafatlal Mill Compounds, N M Joshi Marg, Lower Parel (East), Mumbai - 400013 or send an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or call on 022-23058542/43.

For any other queries relating to the shares of the Company, you may contact the Registrar and Share Transfer Agent at the following address

Ankit Consultancy Pvt. Ltd, 2nd Floor Alankar Point,  
Gita Bhavan Chouraha, A.B. Road, Indore, Madhya Pradesh, 452010  
Tel. : 0731-2491298  
Fax. : 0731 - 4065798  
Email : [ankit\\_4321@yahoo.com](mailto:ankit_4321@yahoo.com)  
Website : [www.ankitonline.com](http://www.ankitonline.com)

Dated : 30-08-2022

For and on behalf of Board of Directors

Sd/-

**Naresh Kumar Sharma**  
Managing Director  
DIN: 00794218

Place : INDORE



**STATEMENT PURSUANT TO SECTION 102(1) OF THE COMPANIES ACT, 2013, AS AMENDED ('ACT') THE FOLLOWING STATEMENT SETS OUT ALL MATERIAL FACTS RELATING TO ITEM NOS. 3 MENTIONED IN THE ACCOMPANYING NOTICE.**

**Item No. 2:**

The Board of Directors („Board”), revised the term of appointment of Mr. **Naresh Kumar Sharma** (DIN: 00794218) on 30-08-2022. The Company has received from Mr. **Naresh Kumar Sharma** (DIN: 00794218) (i) Consent in writing to act as Director in Form DIR-2 pursuant to Rule 8 of the Companies (Appointment and Qualifications of Directors) Rules, 2014; (ii) Intimation in Form DIR-8 in terms of the Companies (Appointment and Qualifications of Directors) Rules, 2014, to the effect that he is not disqualified under Section 164(2) of the Act and (iii) Declaration pursuant to BSE Circular No. LIST/COMP/14/2018-19 dated June 20, 2018, that he has not been debarred from holding office of a Director by virtue of any Order passed by Securities and Exchange Board of India or any other such authority.

The profile and specific areas of expertise of Mr. **Naresh Kumar Sharma** (DIN: 00794218) are provided as annexure to this Notice.

The Board on 30-08-2022 re-appointed Mr. **Naresh Kumar Sharma** (DIN: 00794218) as the Managing Director of the Company, not liable to retire by rotation, for a further period of three years effective 1st October, 2022. However on mutual discussion with Mr. **Naresh Kumar Sharma** (DIN: 00794218) considered and subject to approval of the Shareholders re-consider his re-appointment from 1st October 2022 till 30th September 2025 for a period of 3-years.

The Board, while re-appointing Mr. **Naresh Kumar Sharma** (DIN: 00794218) as the Managing Director of the Company, considered his background, experience.

The main terms and conditions relating to the appointment and terms of remuneration Mr. **Naresh Kumar Sharma** (DIN: 00794218) MD are as follows: (A) Period: For a period of 3 years i.e., from 1st October 2022

(B) Nature of Duties: The MD shall devote his whole time and attention to the business of the Company and perform such duties as may be entrusted to him by the Board from time to time and separately communicated to him and exercise such powers as may be assigned to him, subject to superintendence, control and directions of the Board in connection with and in the best interests of the business of the Company .

(C) 1. Remuneration:

Basic Salary: Rs. 30,000 – Rs. 10,000 – Rs. 50,000 per month .

2. Perquisites: The Director shall be entitled to the following perquisites

2.1 Housing: Rs.10,000/- per month or the expenditure incurred by the company on hiring furnished accommodation for the appointee shall be subject to the ceiling of 60% of the salary, over and above 10% payable by the appointee. If the rent is lower than 10% of the salary the amount payable by the appointee will be limited to such rent. In case the accommodation is owned by the company, 10% of the salary of the appointee shall be deducted by the company.

2.2 Leave Travel Concession & Medical Reimbursement:

(a) Leave Travel Expenses: Expenses incurred for the appointee and his family subject to a ceiling of Rs. 25,000/- in a year, in accordance with the rules specified by the company.

(b) Medical Reimbursement: Expenses incurred for the appointee and his family subject to a ceiling of Rs. 15,000/- in a year, in accordance with the rules specified by the company. Explanation: For the purposes of a "family", family means the spouse, dependent children and dependent parents of the appointee.

(c) Encashment of leave: As per company's rules. The Director shall be entitled to leave on full pay and allowances as per the rules of the Company but not more than one month in each year during the period of agreement. Leave can be accumulated upto the period of 60 working days. Encashment of leave, if any, in accordance with the rules of the Company shall be allowed only at the time of retirement or at the end of tenure as the case may be and it will not be included in the computation of ceiling for perquisites.

(d) Reimbursement of actual expenses for books and periodicals purchased for purposes of carrying-on his duties and reimbursement of entertainment expenses actually and properly incurred in the course of the Company's business.

(e) Other benefits to which senior officers of the company are normally entitled to, according to the rules of the company

(f) The Director shall not be paid any sitting fees for attending the meetings of the Board or any committee thereof.

(g) ENTERTAINMENT You shall be entitled for reimbursement of entertainment expenses actually and properly incurred in the course of the Company's business.

(h) PERFORMANCE BONUS The Board of Directors or its committee for each year will determine the amount to be paid by way of commission/performance bonus to the Managing Director and also the frequency of the payment. Provided however that the commission/Performance bonus will be payable on pro-rata basis, in the event of earlier cessation or termination of the appointment.

(i) ESOP : The Director shall not be eligible for ESOP plan of the company . In case the Director dies during the course of his employment, the Company shall pay to his heirs/ legal representatives the remuneration and / or other perquisites due and payable upto the date of death of the Director.

The Director shall not either during the continuance of his employment hereunder or thereafter except in the proper course of his duties hereunder divulge to any person whomsoever and shall use his best endeavours to prevent the publication or disclosure of any trade secret industrial process or any information concerning the business or finances of the Company or any other Company for whom he is directed to perform services hereunder or of any of their dealings transactions or affairs which may come to his knowledge during or in the course of his employment.

It is hereby agreed and declared that so long as the Director is in the employment of the Company she shall have no interest directly or indirectly in any manner whatsoever including but without limiting the generality thereof in any financing arrangements in or with any person, firm, company or corporation engaged in any business that is competitive with any business which the Company or any other

Company which is subsidiary or is affiliated to or is associated with the Company carries or from time to time. In the event that the Director breaches this Clause, the Company may terminate the Director's employment hereunder without notice and such termination shall not affect any of the Director's other obligations mentioned and the same shall survive such termination.

The profile and specific areas of expertise of Mr. **Naresh Kumar Sharma** (DIN: 00794218) are provided as annexure to this Notice. None of the Directors and Key Managerial Personnel of the Company or their respective relatives, except Mr. **Naresh Kumar Sharma** (DIN: 00794218), to whom the resolution relates, is concerned or interested in the Resolution.

In compliance with the provisions of Section 196, 197, 203 and other applicable provisions of the Act, read with Schedule V to the Act as amended, and based on the recommendation of the Board, approval of the Members is sought for the appointment and terms of remuneration of Mr. **Naresh Kumar Sharma** (DIN: 00794218) as Managing Director as set out above.

The Board recommends the Resolution set forth in Item No. 3 for the approval of the Members.

None of the Directors and Key Managerial Personnel of the Company or their respective relatives, except Mr. Sharma, to whom the resolution relates, is concerned or interested in the Resolution mentioned at Item No. 3 of the Notice.

#### ANNEXURE TO THE NOTICE

Details of the Directors seeking appointment/re-appointment in the forthcoming Annual General Meeting [Pursuant to Regulations 26(4) and 36(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, and Secretarial Standard on General Meeting.

DESCRIPTIONS	<b>Naresh Kumar Sharma</b>
1.Designation	Managing Director
2. Date of Birth	21.05.1967
3.DIN	00794218
4. Qualification(s)	B.com
5. Bodies Corporate (other than Sanchay Finvest Limited) in which the Appointee holds Directorships and Committee positions	1. Sanchay Finvest Limited. 2. Sanchay Fincom Limited. 3. Sujala Industrial Supplying Private Limited. 4. Proton Softech Limited. 5. Clipto Pharmaceutical Limited. 6. Venteck Technologies Limited
5.1. Directorships	
5.2. Member/Chairmanship of Board Committees (a) Audit Committee (b) Stakeholders (c) Nomination (d) CSR	NA



6. Disclosure of Relationship inter-se between Directors, Manager and other Key Managerial Personnel	Relatives as they are Family.
7. Shareholding in the company & % of Holdings	
1. Particulars of experience, attributes or skills	Nil

**DIRECTORS' REPORT**

Your Directors are pleased to present the Annual Report of the Company together with the Audited Financial Statements for the year ended 31<sup>st</sup> March, 2022.

**SUMMARY OF FINANCIAL RESULTS OF THE COMPANY:**

PARTICULARS	YEAR ENDED	
	2021-2022	2020-2021
Total income	5934000	8153768
Total Expenditure	5888000	5843858
Profit Before Interest and depreciation	46,000	2,309,910
Less: Depreciation	-	-
Interest	-	-
Current Tax	-	-
Deferred Tax	(20000)	(18,537.00)
Net Profit/(Loss) After Tax	26,000	2,291,373

**YEARLY REVIEW:**

Your Directors are focusing the expansion of the market of the products of Your Company. During the year Company has focused on the advertisement of the Company Core product Your Directors are focusing on promoting the brands of the Company so that the Goodwill earned by this brand may be used in increasing the sales of the Company and thereby the profits of the Company. Your directors look forward for better working results in the years to come.

**DIVIDEND:**

The directors have decided to conserve the reserves and hence, and hence no dividend is to be Declared for the year.

**DEPOSITS:**

The Company has not accepted within the meaning of the provisions of section 73 of the Companies Act, 2013. There was no overdue/unclaimed deposit as at the date of the Balance Sheet.

**MANAGEMENT'S DISCUSSION AND ANALYSIS REPORT:**

Management's Discussion and Analysis Report for the year under review, as stipulated under Regulation 34 (3) read with Schedule Part V of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 with Stock Exchange in India, is presented in a separate Annexure -I forming part of the Annual Report.

**DIRECTORS AND KEY MANAGERIAL PERSONNEL:**

As on 31<sup>st</sup> March 2022 the Board of Directors of the company comprised 6 directors, Out of which one is executive director. Remaining 5 directors are non-executive directors. Three non-executive directors are independent directors.

**NUMBER OF MEETINGS OF THE BOARD:**

The Board met 4 times during the financial year, the details of which are given in the Corporate Governance Report that forms part of this Annual Report. The intervening gap between any two meetings was within the period prescribed by the Companies Act, 2013.

Sr. No	Date of Board Meetings	No. of Directors Entitled to Attend	No. of Directors Present
1	30.06.2021	6	6
2	14.08.2021	6	6
3	12.11.2021	6	6
4	12.02.2022	6	6

**INDEPENDENT DIRECTORS DECLARATION:**

The Company has received necessary declaration from each independent director under Section 149(7) of the Companies Act, 2013, that he/she meets the criteria of independence laid down in Section 149(6) of the Companies Act, 2013 and Regulation 25 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015.

The Independent Directors under section 149(6) of the Companies Act, 2013 declared that:

1. They are not promoters of the Company or its holding, subsidiary or associate company;
2. They are not related to promoters or directors in the company, its holding, subsidiary or associate company.
3. The Independent Directors have /had no pecuniary relationship with company, its holding, subsidiary or associate company, or their promoters, or directors, during the two immediately preceding financial years or during the current financial year;
4. None of the relatives of the Independent Director has or had pecuniary relationship or transaction with the company, its holding, subsidiary or associate company, or their promoters, or directors, amounting to two per cent or more of its gross turnover or total income or fifty lakh rupees or such higher amount as may be prescribed, whichever is lower, during the two immediately preceding financial years or during the current financial year;
5. Independent Director, neither himself nor any of his relatives--
  - (i) holds or has held the position of a key managerial personnel or is or has been employee of the company or its holding, subsidiary or associate company in any of the three financial years immediately preceding the financial year in which he is proposed to be appointed



- (ii) is or has been an employee or proprietor or a partner, in any of the three financial years immediately preceding the financial year in which he is proposed to be appointed, of—
- (A) a firm of auditors or company secretaries in practice or cost auditors of the company or its holding, subsidiary or associate company; or
- (B) any legal or a consulting firm that has or had any transaction with the company, its holding, subsidiary or associate company amounting to ten percent or more of the gross turnover of such firm;
- (iii) Holds together with his relatives two percent or more of the total voting power of the company; or
- (iv) is a Chief Executive or Director, by whatever name called, of any nonprofit organization that receives twenty-five percent or more of its receipts from the company, any of its promoters, directors or its holding, subsidiary or associate company or that holds two percent or more of the total voting power of the company;
6. Independent Director possesses such qualifications as may be directed by the Board.
7. The Company & the Independent Directors shall abide by the provisions specified in Schedule IV of the Companies Act, 2013.

Familiarization Program for Independent Directors:

Familiarization Programme for Independent Directors is designed with an aim to make the Independent Directors aware about their roles, responsibilities and liabilities as per the Act, the SEBI LODR Regulations and other applicable laws and to get better understanding about the Company, nature of industry in which it operates and environment in which it functions, business model, long term/short term/strategic plans, important changes in regulatory framework etc. As a part of familiarization programme, the Company makes presentations to the Board Members, inter alia, business strategies, management structure, HR Policy, and policies applicable as per the SEBI LODR Regulations.

At the time of appointing an Independent Director, a formal letter of appointment is given to him, which inter-alia explains the roles, rights and responsibilities expected of him as an Independent Director of the Company. The relevant policies of the Company including the Code of Conduct for Board Members and Senior Management Personnel and the Code of Conduct to regulate, monitor and report trading by insiders etc. are circulated to the Directors.

**BOARD EVALUATION:**

SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 mandates that the Board shall monitor and review the Board evaluation framework. The Companies Act, 2013 states that a formal annual evaluation needs to be made by the Board of its own performance and that of its committees and individual directors. The Schedule IV of the Companies Act, 2013 states that the performance evaluation of independent directors should be done by the entire Board of Directors, excluding the director being evaluated.

The evaluation of all the directors and the Board as a whole was conducted based on the criteria and framework adopted by the Board. The Board approved the evaluation results alongwith evaluation done by the Nomination and Remuneration Committee.

**PERFORMANCE OF THE BOARD AND COMMITTEES:**

During the year under review, the performance of the Board & Committees and individual Director(s) based on the below parameters was satisfactory:

- (i) All Directors had attended the Board meetings.
- (ii) The Independent Directors contributed significantly in the Board and committee deliberation and business and operations of the Company and subsidiaries based on their experience and knowledge and Independent views.
- (iii) The Credit Policy, Loan Policy and compliances were reviewed periodically;
- (iv) Risk Management Policy was implemented at all critical levels and monitored by the Internal Audit team who places report with the Audit committee and Board.

**MEETING OF INDEPENDENT DIRECTORS:**

Pursuant of the provision of Section 149 (8) of the Companies Act, 2013 read with Schedule IV and Regulation 25 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, the Independent Directors of the Company held their meeting on 12.02.2022, reviewed the performance of non-independent directors and the Board as a whole including the Chairperson of the Company, views expressed by the executive directors and non-executive directors at various level, and quantified the quality, quantity and timeliness of flow of information between the Company, management and the Board and expressed satisfaction.

**POLICY ON DIRECTORS APPOINTMENT AND REMUNERATION:**

The current policy is to have an appropriate mix of executive and independent directors to maintain the independence of the Board and separate its functions of governance and management. As on 31<sup>st</sup> March, 2022, the Board consists of 6 members. Out of which one is the Managing Director.

The policy of the Company on directors appointment and remuneration, including criteria for determining qualifications, positive attributes, independence of a director and other matters provided under Sub section (3) of Section 178 of the Companies Act, 2013, adopted by the Board and are stated in this Board report.

We affirm that the remuneration paid to the directors is as per the terms laid out in the nomination and remuneration policy of the Company.

**COMMITTEES OF THE BOARD:**

Currently, the Board has Three Committees:

- 1) Audit Committee,
- 2) Nomination and Remuneration Committee,
- 3) Stakeholders Relationship Committee.

A detailed note on the Board and its Committees is provided under the Corporate Governance Report that forms part of this Annual Report.

#### **NOMINATION AND REMUNERATION COMMITTEE AND STAKEHOLDERS RELATIONSHIP COMMITTEE:**

Pursuant to the Section 178 of the Companies Act, 2013, the Company has set up a Nomination and Remuneration and Stakeholders Relationship Committee. A detailed note on the composition of the Committees is provided in the corporate governance report section of this Annual Report.

**The Key Features of the Policy of the said committee are as follows:**

For Appointment of Independent Director (ID):

- a. Any person who is between the age of 25 years and below 75 years eligible to become Independent Director(ID);
- b. He has to fulfill the requirements as per section 149 of the Companies Act, 2013 read with Clause 49 of the Listing Agreement;
- c. Adhere to the code of conduct as per Schedule IV to the Companies Act, 2013;
- d. Strictly adhere to the Insider Trading Regulation of the SEBI and Insider Trading policy of the Company;
- e. Independent Director should have adequate knowledge and reasonably able to contribute to the growth of the Company and stakeholders;
- f. Independent Director should be able to devote time for the Board and other meetings of the company;
- g. Entitled for sitting fees and reasonable conveyance to attend the meetings; and
- h. Able to review the policy, participate in the meeting with all the stakeholders of the company at the Annual General Meeting.

#### **DIRECTORS' RESPONSIBILITY STATEMENT:**

Pursuant to the Section 134(3) (c) and Section 134 (5) of the Companies Act, 2013, the Board of Directors of the Company hereby confirm:

- (i) That in the preparation of the accounts for the financial year ended 31<sup>st</sup>March, 2022, the applicable accounting standards have been followed along with proper explanation relating to material departures;
- (ii) That the Directors have selected such accounting policies and applied them consistently and made judgments and estimates that were 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 the profit and loss of the Company for the year under review;
- (iii) That the Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- (iv) That the Directors have prepared the accounts for the financial year ended 31<sup>st</sup>March 2022 on a 'going concern' basis.
- (v) The internal financial controls are laid and have been followed by the company and that such controls are adequate and are operating effectively. Such controls means controls and policies and procedures adopted and adhered by the company for orderly and



efficient conduct of the business for safeguarding assets, prevention and detection of frauds and errors and maintenance of accounting records and timely preparation of financial statements and review its efficiency.

- (vi) The Directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

#### **RISK MANAGEMENT POLICY:**

The company has developed Risk Management Policy mainly covering the following areas of concerns

1. On the international currencies front, volatility of exchange rate is a matter of concern for a Company because major sales are in the form of exports worldwide besides corresponding imports in foreign currency for key raw materials. However, the risk associated with currency fluctuation has been mitigated by effective forex management policy.
2. Lack of clarity on future Government policies abroad continues to be an area of major concern for the industry. The exact impact of this cannot be assessed until the proposed changes are actually introduced and implemented.
3. In line with the overall growth objective and strengthening of infrastructure base, the Company had invested in Information Technology (IT) viz. SAP Enterprising Resource Planning system for leveraging its business values.

#### **VIGIL MECHANISM / WHISTLE BLOWER POLICY:**

In terms of the provisions of Section 177(9) of the Companies Act, 2013, the Company has implemented a vigil mechanism named Whistle Blower Policy to deal with instance of fraud and mismanagement, if any, in staying true to our values of Strength, Performance and Passion and in line with our vision of being one of the most respected companies in India, the Company is committed to the high standards of Corporate Governance and stakeholder responsibility.

A high level Committee has been constituted which looks into the complaints raised. The Committee reports to the Audit Committee and the Board. The Whistle Blower Policy ensures that strict confidentiality is maintained whilst dealing with concerns and also that no discrimination will be meted out to any person for a genuinely raised concern.

#### **INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY:**

The Board has adopted the policies and procedures for ensuring the orderly and efficient conduct of its business, including adherence to the 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 disclosures.

The Company has an Internal Control System, commensurate with the size, scale and complexity of its operations. To maintain its objectivity and independence, the Internal Audit function reports to the Chairman of the Audit Committee.

The Internal Audit Department monitors and evaluates the efficacy and adequacy of internal control system in the Company, its compliance with operating systems, accounting procedures and policies at all locations of the Company.

Based on the report of internal audit function, process owners undertake corrective action in their respective areas and thereby strengthen the controls. Significant audit observations and recommendations along with corrective actions thereon are presented to Board.

**STATUTORY AUDITORS:**

At the Annual General Meeting of the Company held for Financial Year 2017. V. R. Bhabhra & Co., Chartered Accountants, were appointed to act as Statutory Auditor of the Company for a period 5 years commencing from the conclusion of 26th Annual General Meeting up to the conclusion of Annual General Meeting to be held in the calendar year 2022.

pursuant to Section 139, 142 and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder, pursuant to the recommendations of the audit committee to the Board of Directors, and pursuant to the resolution passed by the members at the AGM held in 2017 the appointment of M/s. V. R. Bhabhra & Co, Chartered Accountants, (Firm Registration No. 112861W) as the Auditors of the Company to hold office till the conclusion of the AGM to be held in the calendar year 2022, be and is hereby re-appointed for 5 consecutive years starting from the conclusion of 31<sup>st</sup> AGM to 36<sup>th</sup> AGM to be held in the calendar year 2017 and that the Board of Directors be and is hereby authorized to fix the remuneration payable to auditor as may be determined by the Audit Committee in consultation with the auditors, and that such remuneration may be paid on a progressive billing basis as may be agreed upon between the Auditors and the Board of Directors.

In terms of the provisions relating to statutory auditors forming part of the Companies Amendment Act, 2017, notified on May 7, 2018, ratification of appointment of Statutory Auditors at every AGM is no more a legal requirement. Accordingly, the notice convening the ensuing AGM does not carry any resolution on ratification of the appointment of the Statutory Auditors.

M/s. V. R. Bhabhra & Co., Chartered Accountants, Statutory Auditor of the Company has audited books of account of the Company for the financial years ended March 31, 2022 and have issued the Auditor's Report thereon. There are no qualifications or reservation on adverse remarks or disclaimers in the said report.

**AUDITORS REPORT:**

The Auditors have not made any qualification to the financial statement. Their reports on relevant notes on accounts are self-explanatory and do not call for any comments under section 134 of the companies Act, 2013.

**SECRETARIAL AUDITORS AND THEIR REPORT:**

Mr. Ramesh Mishra & Associates, Company Secretary in Practice was appointed to conduct the secretarial audit of the Company for the financial year 2021- 2022, as required under Section 204 of the Companies Act, 2013 and Rules there under. The Secretarial Audit Report for F.Y. 2021-22 is **Annexure-II** to this Board's Report.

The Board has re-appointed M/s. Ramesh Chandra Mishra & Associates, Company Secretary in Practice, as secretarial auditor of the Company for the financial year 2022-23.

**Secretarial Compliance Report**

Your Company's paid-up Equity Share Capital and Net-worth, on last day of the previous year, i.e., on March

31, 2022, are below the threshold limits mentioned in the Regulation 15(2) of the SEBI LODR Regulations. Hence, the compliance w.r.t. to Regulation 24A, i.e., Secretarial Compliance Report is not applicable to the Company for the financial year under review.

**Details of Fraud reported by Auditors**

During the financial year under review, neither the Statutory Auditors nor the secretarial auditors have reported to the Board or Audit Committee under Section 143(12) of the Act, any instances of fraud committed against the Company by its officers or employees.

**SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE COURTS/REGULATORS:**

There are no orders passed by the regulators or courts or tribunals impacting the going concern status and Company's operations in future.

**CONSERVATION OF ENERGY, TECHNOLOGY AND FOREIGN EXCHANGE:**

The relevant information pertaining to conservation of energy, technology absorption, foreign exchange earnings and outgo as prescribed under section 134(3) (m) of the Companies Act, 2013, read with Rule 8 of the Companies (Accounts) Rules, 2014, are set out herein below:

**A) CONSERVATION OF ENERGY:**

The Company continues its policy of encouraging energy conservation measures. The regular review of energy consumption and the systems installed to control utilization of energy is undertaken.

**B) RESEARCH & DEVELOPMENT ACTIVITIES:**

The Company has its own R&D center. The R&D center follows stringent guidelines based on Good Laboratory Practices and is well equipped with the latest equipment in particle size analysis, gas chromatography, high-performance liquid chromatography, dissolution testing, stability chambers and lab-scale manufacturing machines.

**C) TECHNOLOGY ABSORPTION:**

Sanchay Finvest Limited seeks to continuously invest in upgrading its manufacturing and R&D operations to incorporate the latest technologies in an effort to improve performance.

**RELATED PARTY TRANSACTIONS/CONTRACTS:**

The Company has implemented a Related Party Transactions policy for the purposes of identification and monitoring of such transactions. The policy on related party transactions is uploaded on the Company's website.

All related party transactions are placed before the Audit Committee for approval. Prior omnibus approval of the Audit Committee is obtained on an annual basis which is reviewed and updated on quarterly basis.

Pursuant to the Section 134(3)(h) of the Companies Act, 2013 and Rule 8(2) of the Companies (Accounts) Rules, 2014, the particulars of contract or arrangement entered into by the Company with related parties referred to in Section 188(1) in Form AOC-2 into this Board's Report.

**HUMAN RESOURCES MANAGEMENT:**

We take this opportunity to thank employees at all levels for their dedicated service and contribution made towards the growth of the company. The relationship with the Company's staff has continued to be cordial.



To ensure good human resources management at the company, we focus on all aspects of the employee lifecycle. During their tenure at the Company, employees are motivated through various skill-development, engagement and volunteering programs.

As per provisions of Section 197(12) of the Companies Act, 2013, read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, is **Annexure-IV** to this Board's report.

In terms of Section 197(12) of the Companies Act, 2013, read with Rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, no employee(s) drawing remuneration in excess of limits set out in said rules forms part of the annual report.

#### **EXTRACT OF ANNUAL RETURNS:**

Pursuant to Section 92(3) read with section 134(3)(a) of the Companies Act, 2013, copies of the Annual Returns of the Company prepared in accordance with Section 92(1) of the Act read with Rule 11 of the Companies (Management and Administration) Rules, 2014 are placed on the website of the Company and is accessible at the web-link: [www.sanchayinvest.in](http://www.sanchayinvest.in).

#### **CORPORATE GOVERNANCE:**

A Report on Corporate Governance along with a Certificate from M/s. Ramesh Chandra Mishra & Associates, regarding compliance with the conditions of Corporate Governance as stipulated under Clause 49 of the Listing Agreement with Stock Exchange read with the relevant provisions of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 forms part of this Report and **Annexure-III** to this Board's Report.

#### **DISCLOSURE AS PER SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013:**

The Company has in place an Anti-Sexual Harassment Policy in line with the requirements of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. The Internal Complaints Committee (ICC) has been set up to redress complaints received regarding sexual harassment. All employees (permanent, contractual, temporary, trainees) are covered under this policy. The Company has not received any complaint under this policy during the 2021-2022.

#### **BANK AND FINANCIAL INSTITUTIONS:**

Directors are thankful to their bankers for their continued support to the company.

#### **CORPORATE SOCIAL RESPONSIBILITY:**

As per the Companies Act, 2013 all companies having net worth of 500 crore or more or turnover of Rs. 1000 crore or more or a net profit of Rs. 5 crore or more during any financial year are required to constitute a appropriate corporate social responsibility (CSR) Committee of the Board of Directors comprising three or more directors, at least one of whom an independent director and such company shall spend at least 2% of the average net profits of the Company's three immediately preceding financial year.

The Company presently does not with any of the criteria stated herein above.

**ACKNOWLEDGMENTS:**

Your Directors convey their sincere thanks to the Government, Banks, Shareholders and customers for their continued support extended to the company at all times.

The Directors further express their deep appreciation to all employees for commendable teamwork, high degree of professionalism and enthusiastic effort displayed by them during the year.

Date: INDORE  
Place: 30.08.2022

By Order of the Board  
For Sanchay Finvest Limited  
Sd/-  
Naresh Kumar Sharma  
Managing Director

**ANNEXURE-I**  
**MANAGEMENT DISCUSSION AND ANALYSIS REPORT:**

**Industry Structure & Developments:**

The Company is mainly into broking activities and cash and derivatives segment at BSE. The related income is mainly from brokerage. During the year under review the income of the company has substantially reduced.

**Opportunities & Threats:**

The company anticipated growth because of the friendly economic policies of the government



to give boost to the capital market. In the years to come the capital market will see a growth. RBI and the financial commission already hinted positive growth rate for the company.

**Segment-wise Performance:** The Company's main business is Investment in shares and Investment in Equity / Debt Mutual Funds and all the activities of the Company are related to its main business. As such there are no separate reportable segments.

(a) **Outlook:** The Company continues to explore the possibilities of expansion and will make the necessary investments when attractive opportunities arise.

(b) **Risks and Concerns:** The Company is exposed to specific risks that are particular to its businesses and the environment within which it operates, including interest rate volatility, economic cycle, market risk and credit risk. The Company manages these risks by maintaining a conservative financial profile and by following prudent business and risk management policies.

(c) **Internal Control Systems & their Adequacy:** The Company's operating and business control procedures have been framed in order that they ensure efficient use of resources and comply with the procedures and regulatory requirements. The Company has a proper and adequate system of internal controls to ensure that all assets are safeguarded and protected against loss from unauthorized use or disposition and the transactions are authorized, recorded and reported correctly. The Audit Committee reviews the quarterly and annual financial statements, adequacy of disclosures treatment of various items involving accounting judgments.

(d) **Discussions on Financial Performance with respect to Operational Performance:** The turnover of the company during the year has increased compared to last year.

(e) **Human Resource Development:** The Company believes that the human resources are vital in giving the Company a Competitive edge in the current business environment. The Company's philosophy is to provide congenial work environment, performance oriented work culture, knowledge acquisition/ dissemination, creativity and responsibility. As in the past, the Company has enjoyed cordial relations with the employees at all levels.

(f) **Cautionary Statement:** Statements in this report on Management Discussion and Analysis describing the Company's objectives, projections, estimates, expectations or predictions may be "forward-looking statements" within the meaning of applicable securities laws and regulations. Actual results could differ materially from those expressed or implied.

Date: 30.08.2022  
Place: Indore

By Order of the Board  
For Sanchay Finvest Limited  
Sd/-  
Naresh Kumar Sharma  
Managing Director  
DIN: 00794218

## ANNEXURE - II

## Form No. MR-3

SECRETARIAL AUDIT REPORT  
FOR THE FINANCIAL YEAR ENDED 31.03.2022

[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  
Sanchay Finvest Limited  
209, RAJANI BHUVAN,  
569M.G. ROAD INDORE

We have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Sanchay Finvest Limited (hereinafter called the Company).

Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts / statutory compliances and expressing our opinion thereon.

Based on our verification of the Company'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 31st March, 2022 (hereinafter called the 'Audit Period') 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 March 31, 2022 according to the provisions of:

1. The Companies Act, 2013 (the Act) and the rules made thereunder and certain provisions of Companies Act, 1956 and 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 thereunder to the extent of Foreign Direct Investment and Overseas Direct Investment (Not applicable to the Company during the Audit Period).

The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):

5. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
6. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
7. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009, subject to amendment Act, 2018;
8. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 2006 regarding the Companies Act and dealing with client;
9. The Securities and Exchange Board of India ( Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 2014 (Not applicable to the Company during the Audit Period).  
Other laws applicable specifically to the company namely
10. Information Technology Act, 2000 and the rules made thereunder;
11. The Payment of Gratuity Act, 1972.

We have also examined compliance with the applicable clauses of the following:

12. Secretarial Standard issued by The Institute of Company Secretaries of India.
  13. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. The Listing Agreements/Regulations entered into by the Company with Bombay Stock Exchange Limited.
- We further report that, there were no actions / events in pursuance of:

1. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not Applicable to the Company during the Audit Period);
2. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 (Not Applicable to the Company during the Audit Period); and
3. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998, (Not Applicable to the Company during the Audit Period).

We report that, during the year under review, the Company has complied with the provisions of the Acts, rules, regulations, guidelines and Standards, etc. as mentioned above.

**We further report that,** based on the information provided by the Company, its officers and authorized representatives during the conduct of the audit, and also on the review of quarterly compliance reports by respective department heads taken on record by the Board of Directors of the Company, in our opinion, adequate systems and processes and control mechanism exist in the Company to monitor and ensure compliance with applicable general laws like Labour Laws.

**We further report that,** the compliance by the Company of applicable financial laws, like direct and indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by statutory financial audit and other designated professionals.

**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.

**We further report that,** 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 to all Directors, 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. As per the minutes of the meetings duly recorded and signed by the Chairman, the decisions of the Board were unanimous and no dissenting views have been recorded.

**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.

Place: Mumbai  
Date : 10-08-2022

For Ramesh Chandra Mishra & Associates

Sd/-

**Ramesh Chandra Mishra**  
**Practicing Company Secretary**  
FCS: 5477, PCS: 3987  
UDIN : F005477D000771176



**ANNEXURE TO THE SECRETARIAL AUDIT REPORT**

To,  
The Members  
Sanchay Finvest Limited  
209, RAJANI BHUVAN,  
569M.G. ROAD INDORE

**Our report of even date is to read along with this letter.**

1. Maintenance of secretarial record is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the company.
4. Where ever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.

Place: Mumbai  
Date : 10-08-2022

For Ramesh Chandra Mishra & Associates

Sd/-

**Ramesh Chandra Mishra**  
**Practicing Company Secretary**  
**FCS: 5477, PCS: 3987**  
**UDIN : F005477D000771176**

**CORPORATE GOVERNANCE REPORT****1. COMPANY'S PHILOSOPHY OF CORPORATE GOVERNANCE:**

Sanchay Limited management constantly strives towards improving systems and process that promote the values of transparency, professionalism, accountability and compliance. The Company remains firmly committed to this central theme and endeavors to improve these values on an ongoing basis. We have an obligation towards our stakeholders including shareholders, employees, customers, suppliers and communities to be honest, fair and forthright in our business activities.

Good corporate governance is the basis for decision-making and control processes and comprises responsible, value-based management and monitoring focused on long-term success, goal-orientation and respect for the interests of our stakeholders.

Recent amendments of Companies Act, 2013 are effective from October 1, 2014. The amended rules require Companies to get shareholders' approval for related party transactions, establish whistleblower mechanisms, elaborate disclosures on pay packages and have at least one Woman Director on their boards. The Securities and Exchange Board of India (SEBI) has notified SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 on 2<sup>nd</sup> September, 2015, replacing the earlier Listing Agreement (w.e.f. 1<sup>st</sup> December, 2015). The amended norm is aligned with the provisions of the Companies Act, 2013 and is aimed to encourage Companies to 'adopt best practices on corporate governance.

**BOARD OF DIRECTORS:**

At present the Board of the Company is adequately equipped and well represented by Women Directors and Independent Directors of high repute. The Chairman of the Board and Audit Committee is headed by Independent Director(s). As per the

Listing Regulations, it is mandatory for the company with a non-executive director as a chairperson to have at least one-third of the independent directors. The following composition of board of directors of the company as follows:

**COMPOSITION OF BOARD AS ON 31<sup>st</sup> MARCH, 2022:**

Sr.no	NAME OF DIRECTOR/KMP	CATEGORY	DESIGNATION
1	NIKHIL SARAN MATHUR	Non Executive Director	Independent Director
2	NAROTTAM KUMAR NANDLAL SHARMA	Non Executive Director	Non Independent Director-
3	NARESH KUMAR NANDLAL SHARMA	Executive Director	Managing Director
4	SURESHKUMAR NANDLAL SHARMA	Non Executive Director	Director
5	VINITA NARESH SHARMA	Non Executive Director	Independent Women Director
6	SARTHAK NARESH SHARMA	Non Executive Independent Director	Independent Director

**MEETINGS AND ATTENDANCE DURING THE YEAR 2021-2022:**

Annual General Meeting will be held on 30<sup>th</sup> November, 2021

Board Meetings were conducted 4(Four) times during the year as follows:

Sr. No	Date of Board Meetings	Board Strength	No. of Directors Present
1	30.06.2021	6	6
2	14.08.2021	6	6
3	12.11.2021	6	6
4	12.02.2022	6	6

**NOTES:**

1. The Board evaluated each of Independent Directors participation in the Board and their vast experience, expertise and contribution to the Board and Company. Each and every related party transactions very well scrutinized and checks were made so that the Company is a beneficiary.
2. The Independent Directors held a meeting on 12.02.2022, without the attendance of Non-Independent Directors and members of Management. All Independent Directors were present at the meeting and they have reviewed the performance of non-independent directors and the Board, performance of the Chairman and information flow structure of the Company.
3. During the period the Company received notices/declarations from the Independent Directors as per Schedule IV and section 149 (6) of the Companies Act, 2013.
4. Mrs. Vinita Sharma Naresh is one women director to the Board.
5. The Board has also set up a committee to meet with the women's grievances in line with "Vishakha Guidelines" namely Health and Safety Committee.
6. The Chairman also set up a Whistleblower mechanism in line with the policy of the company and as per SEBI notification CIR/CFD/POLICY CELL/2/2014 read with section 177 of Companies Act, 2013.

**AUDIT COMMITTEE:****Brief description and terms of reference:**

To oversee the Company's Financial Report process, internal control systems, reviewing the accounting policies and practices, and financial statements audited by the statutory auditors. The audit committee is duly constituted in accordance with Clause 49 of the Listing Agreement read with Regulation 18 of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 and of Section 177 of the Companies Act, 2013.

**Composition of Audit Committee as on 31<sup>st</sup> March, 2022:**

Sr.No.	Name of Members	Category	Designation
1.	Mr. Nikhil Saran Mathur	Non-Executive Non-Independent Director	Chairman
2.	Mr. Narottam Kumar Sharma	Non-Executive Independent Director	Member
3.	Mrs. Vinita Sharma Naresh	Non-Executive Independent Director	Member
4.	Mr. Naresh Kumar Sharma	Executive Director	Member

Company has conducted 4(Four) Audit Committee Meeting during the year.

April - June	July - September	October - December	January - March
30.06.2021	14.08.2021	12.11.2021	12.02.2022

**Meetings and Attendance of the Audit Committee during the year:**

Sr.No	Name of Member	No. of Meeting Held During the Year	No. of Meeting Attended
1	Mr. Nikhil Saran Mathur	4	4
2	Mr. Narottam Kumar Sharma	4	4
3	Mrs. Vinita Sharma Naresh	4	4
4	Mr. Naresh Kumar Sharma	4	4

The Audit Committee meetings are also attended by CFO & Director Finance, Internal Auditors and Statutory Auditors as invitees.

**Powers of the Audit Committee:**

1. To investigate any activity within its terms of reference.
2. To seek information from any employee.



- 3. To obtain outside legal or other professional advice.
- 4. To secure attendance of outsiders with relevant expertise, if it considers necessary.

**Role of the Audit Committee:**

- 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; and
  - g. Modified opinion(s) 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. Reviewing and monitoring 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;
- 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. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee.

**NOMINATION AND REMUNERATION COMMITTEE:**

**Brief description and terms of reference:**

The objective of Nomination and Remuneration Committee is to assess the remuneration payable to our Managing Director/Whole Time Directors; sitting fee payable to our Non-Executive Directors; remuneration policy covering policies on remuneration payable to our senior executives. The Nomination and Remuneration Committee is duly constituted and the matters specified in accordance with under Clause 49 of the Listing Agreement read with Regulation 19 of SEBI (Listing

**Composition of Nomination and Remuneration Committee as on 31<sup>st</sup> March, 2022:**

Sr. No.	Name of Members	Category	Designation
1	Mr. Nikhil Saran Mathur	Independent-Non Executive Director	Chairman
2	Mrs. Vinita Sharma Naresh	Independent-Non Executive Director	Member
3	Mr. Narottam Kumar Sharma	Non-Executive Non – Independent Director	Member

**ROLE OF THE COMMITTEE:**

The role of Nomination and Remuneration Committee is as follows:

- determining/recommending the criteria for appointment of Executive, Non-Executive and Independent Directors to the Board;
- determining/recommending the criteria for qualifications, positive attributes and independence of Directors;
- identifying candidates who are qualified to become Directors and who may be appointed in Senior Management and recommending to the Board their appointment and removal;
- reviewing and determining all elements of remuneration package of all the Executive Directors, i.e. salary, benefits, bonus, stock options, pension, etc.;
- reviewing and determining fixed component and performance linked incentives for Directors along with the performance criteria;
- determining policy on service contracts, notice period, severance fees for Directors and Senior Management;
- evaluating performance of each Director and performance of the Board as a whole;

**REMUNERATION OF DIRECTORS:**

The remuneration policy is in consonance with the existing industry practice and also with the provisions of the Companies Act, 2013. The Board of Directors has adopted a Remuneration Policy for Directors, Key Managerial Personnel and other employees. The Company's remuneration policy is driven by the success and performance of the individual employee and the performance of the Company.

**a) Remuneration of Executive Directors:**

The details of remuneration paid to the Executive Directors during the year 2021-2022 are given below:

Sr. No.	Name of Directors	Salary	Benefits and Perquisite	Contribution to PF,	Total
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				Superannuation, Gratuity & Leave Encashment	
NIL	NIL	NIL	NIL	NIL	NIL

**Notes:**

- (i) The Company does not have a Scheme for grant of Stock Options to the Directors or Employees.
- (ii) The appointment of Managing Director and Whole time Director is by way of Board/Special Resolution and covering terms and conditions of the services. There is no separate provision for severance fees.

**(b) Remuneration of Non-Executive Directors:**

The details of remuneration paid to Non-Executive Directors for the year 2021-2022 are given below:

Sr. No.	Name of the Directors	Sitting fees	Number of Share Held
NIL	NIL	NIL	NIL

**Notes:**

- (i) The remuneration to Non-Executive Directors comprises only of sitting fees.
- (ii) The criteria for payments of remuneration are time spent by the Non-Executive Directors at the meeting of the Board and Committees.

**STAKEHOLDER RELATIONSHIP COMMITTEE:****Brief description and Terms of Reference:**

To specifically look into redressal of complaints like transfer of shares, non- receipt of dividend, non-receipt of annual report etc. received from shareholders/ investors and improve efficiency. The Committee performs such other functions as may be necessary or appropriate for the performance of its duties. The Stakeholder Relationship Committee is duly constituted and the matters specified in accordance with Clause 49 of the Listing Agreement read with SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 and of Section 178 of the Companies Act, 2013.

**Composition of Stakeholder Relationship Committee as on 31<sup>st</sup> March, 2022:**

Sr.No.	Name of Members	Category	Designation
1	Mr. Nikhil Saran Mathur	Independent-Non Executive Director	Chairman
2	Mrs. Vinita Sharma Naresh	Independent-Non Executive Director	Member
3	Mr. Narottam Kumar Sharma	Non-Executive Non - Independent Director	Member
4	Mr Naresh Kumar Sharma	Executive Director	Member

## MANAGEMENT REVIEW AND RESPONSIBILITY:

### **FORMAL EVALUATION OF OFFICERS:**

The Remuneration Committee of the Board approves the compensation and benefits for all executive Board members. Another committee, headed by the MD, reviews, evaluates and decides the annual compensation of our officers from the level of executive upwards.

### DISCLOSURES:

#### **1. RELATED PARTY DISCLOSURES:**

The Company has not entered into any materially significant related party transactions with its Promoters, Directors, or Management. The Company had formulated and adopted a policy with related party transaction and same is displayed on the Company's website „www.sanchayinvest.in“.

The details of such related party transactions are available in the notes to the standalone Financial statements section of the Annual Report.

#### **2. COMPLIANCE BY THE COMPANY:**

The Company has complied with the requirement of regulatory authorities on matters related to capital market and no penalties/ structure have been imposed against the Company during the last three years.

#### **3. ACCOUNTING TREATMENT:**

The account treatments are in accordance with the applicable accounting standard. The company has not altered or adapted any new standard.

#### **4. RISK MANAGEMENT FRAMEWORK:**

The Company has a well-defined risk management framework in place. The Company has established procedures to periodically place before the Board, the risk assessment and minimization procedures being followed by the Company and steps taken by it to mitigate these risks.

#### **5. VIGIL MECHANISM / WHISTLE BLOWER:**

The Company has implemented a vigil mechanism named Whistle Blower Policy to deal with instance of fraud and mismanagement. The Company is committed to the high standards of Corporate Governance and stakeholder responsibility. All personnel have affirmed that they have not been denied access to the Chairman of the audit committee.

#### **6. NON- MANDATORY REQUIRMENTS:**

**Shareholder's Rights:** The half yearly financial results are published in leading newspapers and also displayed on the Company's website „www.sanchayinvest.in“.



**7. PREVENTION OF INSIDER TRADING:**

The Company has adopted an Insider Trading Policy to regulate, monitor and report trading by insiders under the SEBI (Prevention of Insider Trading) Regulation, 2015 and the same is available on the Company's website „www.sanchayinvest.in“. This policy also includes practices and procedures for fair disclosures of unpublished price-sensitive information, initial and continual disclosures.

**8. CODE OF CONDUCT:**

In accordance with Regulation 26 (3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the Companies Act, 2013, the Company has framed and adopted a Code of Conduct for Board of Director and Senior Management. The Code is available on the Company's website „www.sanchayinvest.in“.

All members of the Board of Directors and Senior Management personnel have affirmed compliance to the Code as on 31<sup>st</sup> March, 2012. A declaration to this effect signed by the Managing Directors annexed to this Report.

**9. CEO AND CFO CERTIFICATION:**

As required by SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the CEO and CFO certification is provided in this Annual Report.

**ANNUAL GENERAL MEETINGS:****Details of Annual General Meetings:**

Particulars	F.Y.2021-2022	F.Y.2021-2022	F.Y.2020-2021
Date	29.09.2022	30.11.2021	30.09.2020
Time	02.00 pm	11.30 am	11.30 am
Venue	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001
Regd. Office	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001

**MEANS OF COMMUNICATION:**

Half Yearly Financial Report	The Financial results of the Company are published in leading newspapers and also displayed on the Company's website „www.sanchayinvest.in“. Therefore, a separate half yearly report is not sent to each shareholder.
Quarterly Financial Results	The quarterly financial results of the Company are published in accordance with the requirement of the Listing Agreement of the Stock Exchanges where the shares of the company are listed.
Website	<a href="http://www.sanchayinvest.in">www.sanchayinvest.in</a>
Administrative/Registered Office	209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001
Whether Management Discussions and Analysis report is a part of Annual Report or not	Yes

**GENERAL SHAREHOLDERS INFORMATION:****1. 31<sup>st</sup> Annual General Meeting:**Date : 29<sup>th</sup> September, 2022

Time : 2.00 pm

Venue : 209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001

**2. Date of Book**Closure : Friday, September 23, 2022 to Thursday, September 29, 2022  
(both days inclusive)**Tentative Calendar for financial year 31<sup>st</sup> March , 2023:**

The tentative dates of meeting of Board of Directors for consideration of quarterly financial results for the financial year ending 31<sup>st</sup> March, 2023 are as follows:

Financial Reporting for the Quarter Ended 30 <sup>th</sup> June 2022	By mid of August 2022
Financial Reporting for the Quarter and Half yearly Ended 30 <sup>th</sup> September 2022	By Mid of November 2022

Financial Reporting for the Quarter Ended 31 <sup>st</sup> December 2022	By mid of February 2023
Financial Reporting for the Quarter Ended 31 <sup>st</sup> March 2023	By mid of May, 2023

3. Registered Office : 209, Rajani Bhuvan, 569 M.G. Road Indore Mp - 452001

4. Listing of Shares on Stock Exchanges:

The Company shares are listed on BSE Limited (BSE). The requisite listing fees have been paid in full to all the Stock Exchanges.

5. A) Stock Codes

BSE : 511563  
ISIN : INE654D01010

B) Corporate Identity Number: L67120MP1991PLC006650

6. Market Price Data: BSE

The Monthly high/low quotation of equity share traded on the BSE Limited, Mumbai areas follows:

Company is in the process of revocation of suspension of shares of the company.

7. Shareholding Pattern as on 31<sup>st</sup> March, 2022:

	Categories of Shareholders	Shares Held	% of Total
I	Promoters	18,79,863	59.68
II	Public		
a)	Banks	-	-
b)	Financial Institution, Insurance Companies, (Central/ State Govt. Institution/ Non-Govt. Institution)	200	0.01
c)	Mutual Funds/UTI/Trust	100	-
d)	Foreign Institutional Investors	-	-
e)	Bodies Corporate	68500	2.17
f)	Public Individuals	1199037	38.06
g)	NRIs / OCBs	200	0.01
h)	Clearing Members	-	-
i)	LLP/Partnership Firm	-	-
J)	HUF	2100	0.07
	<b>TOTAL</b>	<b>3150000</b>	<b>100</b>

**8. Registrar and Transfer Agent:  
SHARE TRANSFER SYSTEM**

M/s. Ankit Consultancy Pvt. Ltd continues to be the Registrar and Transfer Agent of the Company. All the work related to share Registry in terms of both Physical and Electronic segment has been allotted to M/s. Ankit Consultancy Pvt. Ltd , in view of the directive issued by SEBI in this regard i.e. for handling both Physical as well as Electronic transfer at a single point.

Shareholders are therefore requested to send shares for Physical transfer to M/s. Ankit Consultancy Pvt. Ltd instead of sending to the Company. As the Company's shares are compulsorily to be traded in the dematerialized form. Members holding shares in Physical Form are requested to send the share certificate to their Depository Participants to enable Registrar and Transfer Agent to take steps for dematerialization at the following:

The address of Registrar and Transfer agents is:

**Ankit Consultancy Pvt. Ltd**

2nd Floor Alankar Point, Gita Bhavan Chouraha,  
A.B. Road, Indore, Madhya Pradesh - 452001

Email: - [operation@ankitonline.com](mailto:operation@ankitonline.com) / [ankit\\_4321@yahoo.com](mailto:ankit_4321@yahoo.com)

**9. Demat and Physical Shares held as on 31st March, 2022:**

As As on 31st March, 2022: 1959540 shares, representing 62.21% of the total issued capital, were held in dematerialized form and 1190460 shares, representing 37.79% of the total issued capital is held in physical form

**10. Outstanding ADRs / GDRs:**

The company has not issued any ADRs / GDRs

**11. Address for Correspondence:**

209, Rajani Bhuvan,  
569 M.G. Road Indore  
Mp - 452001

9. Listing on Stock Exchanges : Bombay Stock Exchange Ltd., Mumbai

10. Stock Code Mumbai Stock Exchange Ltd., Mumbai : 511563

11. Demat ISIN No. for CDSL and NSDL : INE654D01010





## CERTIFICATE OF COMPLIANCE WITH THE CORPORATE GOVERNANCE

To,  
The Members of  
Sanchay Finvest Limited

We have examined the compliance of conditions of corporate governance by Panjon Limited („the Company“) for the year ended March 31, 2022 as stipulated in Clause 49 of the Listing Agreement and in regulations 17 to 27, clauses (b) to (i) of sub-regulation (2) of regulation 46 and paragraph C,D and E of Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations“) with Stock Exchanges in India.

The compliance of conditions of Corporate Governance is the responsibility of the Company’s management. Our examination was limited to procedures and implementation thereof, adopted by the Company for ensuring the compliance of the conditions of the 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 explanations given to us, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in the above mentioned Listing regulations. Corporate Governance is not applicable to the company.

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

Place: MUMBAI  
Date: 18.04.2022  
UDIN: F005477D000143615

For Ramesh Chandra Mishra & Association

Sd/-  
Ramesh Mishra  
FCS: 5477  
PCS: 3987



**DECLARATION UNDER REGULATION 26 OF THE SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

To,  
The Members of  
Sanchay Finvest Limited

As provided under Regulation 26 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, all the Board of Directors and Senior Management Personnel of the Company have affirmed compliance with Code of Conduct for the year ended March 31, 2022.

Place: INDORE

For Sanchay Finvest Limited

Date: 28.05.2022

Sd/-

Naresh Kumar Sharma  
Managing Director

**Independent Auditor's Report on Annual Financial Results of Sanchay Finvest Limited pursuant to the Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

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To  
The Board of Directors  
Sanchay finvest Limited  
Mumbai

**Opinion**

We have audited the accompanying statement of financial results of **Sanchay Finvest Limited** ("the Company") for the year ended March 31, 2022 ("the Statement"), being submitted by the Company pursuant to the requirement of Regulation 33 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended ("Listing Regulations").

In our opinion and to the best of our information and according to the explanations given to us, the Statement:

- (i) Is presented in accordance with requirements of Regulation 33 of the Listing Regulations in this regards;

and

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and

- (ii) Gives a true and fair view in conformity with the recognition and measurement principles laid down in the applicable Indian Accounting Standards ("Ind AS") and other accounting Principles generally accepted in India of the net profit and other comprehensive income and other financial information of the Company for the year ended March 31, 2021.

### **Basis for Opinion**

We conducted our audit in accordance with the Standards on Auditing ("SAs") specified under section 143(10) of the Companies Act, 2013 ("the Act"). Our responsibilities under SAs are further described in the Auditor's Responsibilities for the Audit of the Statement 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 ("ICAI") together with the ethical requirements that are relevant to our audit of the financial results 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 issued by ICAI. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### **Management's Responsibilities for the Statement**

This Statement, which is the responsibility of the Company's Management and approved by the Board of Directors, has been prepared on the basis of financial statements. The Company's Board of Directors are responsible for the preparation and presentation of these financial results that give a true and fair view of the net profit and other comprehensive income and other financial information of the Company in accordance with the Recognition and measurement principles laid down in Ind AS prescribed under section 133 of the Act read with the relevant rules issued thereunder and other accounting principles generally accepted in India and in compliance with Regulation 33 of the Listing Regulations. 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 Statement that give a true and fair view and are free from material misstatement, whether due to fraud or error.

In preparing the Statement, the Board of Director's are 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 the Board of Directors either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so. 1

The Board of Directors are also responsible for overseeing the financial reporting process of the Company.

### **Auditor's Responsibilities for the Audit of the Statement**

Our objectives are to obtain reasonable assurance about whether the Statement 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 financial results.

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 Statement, 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 through a separate report on the complete set of financial statements on whether the Company has adequate internal financial controls with reference to 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 the Board of Directors.
- Conclude on the appropriateness of the Board of Directors' 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 financial results 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 Statement, including the disclosures, and whether the Statement represent the underlying transactions and events in a manner that achieves fair presentation.

Materiality is the magnitude of misstatements in the Statement that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the Statement 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 Statement.

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.

#### **Other Matters**

The Statement includes the results for the quarter ended March 31, 2022 being the balancing figures between the respective audited figures in respect of the full financial year and the published unaudited year to date figures up to the third quarter of the respective financial year which were subject to limited review by us.

**For V. R. BHABHRA & CO.**  
**(Chartered Accountants)**  
**FRN No: 112861W**

**VIMAL R. BHABHRA**  
**(Partner)** **Place: Mumbai**  
**Membership No: 046043**  
**UDIN: 22046043AJUWOH4609**

**Date: 28<sup>th</sup> May, 2022**

**SANCHAY FINVEST LIMITED**  
Balance Sheet as on 31st March 2022

Particulars	Notes	As at 31-March-2022	As at 31-March-2021
<b>ASSETS</b>			
<b>(1) Non-current assets:</b>			
(a) Property, Plant & Equipment	(3)	368,072	112,182
(b) Investment Property		438,000	438,000
(c) Financial assets			
(i) Investments	(4)	9,073,965	9,073,965
(d) Deferred tax assets	(5)	3,729	23,562
(e) Other assets	(6)	13,275,000	13,275,000
<b>Total non-current assets</b>		<b>23,163,766</b>	<b>22,920,709</b>
<b>(2) Current assets</b>			
(a) Financial assets			
(i) Investments	(4)		-
(ii) Trade Receivables	(7)	5,174,851	2,676,914
(iii) Cash and cash equivalents	(8)	799,588	527,615
(iii) Bank balances, other than (ii) above	(8)	5,065,728	4,808,972
(iv) Loans	(9)	6,516,715	7,039,400
(v) Other Financial Assets		14,905,881	7,384,832
(b) Current tax assets		388,194	389,137
<b>Total current assets</b>		<b>32,860,936</b>	<b>22,819,869</b>
<b>TOTAL ASSETS</b>		<b>56,024,701</b>	<b>45,739,399</b>
<b>EQUITY AND LIABILITIES</b>			
<b>EQUITY</b>			
(a) Equity share capital	(10)	31,500,000	31,500,000
(b) Other equity	(11)	(820,719)	(848,287)
<b>TOTAL EQUITY</b>		<b>30,679,281</b>	<b>30,651,713</b>
<b>LIABILITIES</b>			
<b>(1) Non-current liabilities</b>			
(a) Financial liabilities			
(i) Trade Payables	(13)	-	-
(ii) Other financial liabilities	-	-	-
(c) Other non-current liabilities	-	-	-
<b>Total non-current liabilities</b>		<b>-</b>	<b>-</b>



<b>(2) Current liabilities</b>			
(a) Financial liabilities			
(i) Trade payables	(13)	20,183,654	14,062,970
(ii) Other financial liabilities	(14)	4,394,448	622,716
(c) Other current liabilities	(15)	547,318	-
<b>Total current liabilities</b>		<b>25,125,420</b>	<b>14,685,686</b>
<b>TOTAL LIABILITIES</b>		<b>25,125,420</b>	<b>14,685,686</b>
<b>TOTAL EQUITY AND LIABILITIES</b>		<b>56,004,701</b>	<b>45,739,399</b>
<b>Mention below</b>			
Corporate information		1	
Significant accounting information		2	
The notes referred to above form an integral part of the financial statements.			
As per our report of even date			
For V.R.BHABHRA & Co.		For and on behalf of Board of Directors of Sanchay Fivest Limited	
Firm Registration No : 112851W (Chartered Accountants)			
V. R. Bhabhra Partner Membership No : 46043		Naresh Kumar Sharma Director DIN : 00794218	Naretdam Kumar Sharm Director DIN : 00794167
Place: Mumbai		Place: Mumbai	
Dated: : 28th May, 2022		Dated: : 28th May, 2022	

**SANCHAY FIVEST LIMITED**  
Statement of profit and loss for the year ended 31st March 2022

Particulars	Notes	Amount in Rs.	
		For the year ended 31 March 2022	For the year ended 31 March 2021
<b>INCOME</b>			
Revenue from operations	(16)	5,571,758	7,418,032
Other income	(17)	382,350	734,738
<b>Total income</b>		<b>5,934,108</b>	<b>8,153,768</b>
<b>EXPENSES</b>			
Loss in Derivative Trading		-	3,144,306
Loss in Share Trading		-	-
Speculation Loss		-	18,526
Employee benefits expense	(18)	187,000	120,000
Finance cost	(19)	1,109	413
Depreciation and amortisation expenses	(3)	155,085	36,614
Other expense	(20)	5,565,459	2,528,909
<b>Total Expenses</b>		<b>5,888,705</b>	<b>5,843,858</b>
<b>Profit/ (loss) before tax</b>		<b>45,401</b>	<b>2,309,910</b>
<b>Tax expense:</b>			
(2) Short provision of earlier year taxes		-	-
(3) Deferred tax		(18,833)	(18,537)
<b>Profit/ (loss) for the year after tax net of tax</b>		<b>26,568</b>	<b>2,291,373</b>
<b>Total comprehensive income for the year</b>		<b>26,568</b>	<b>2,291,373</b>

See accompanying notes to the financial statements

As per our report of even date

For V.R.BHABHRA & Co.  
Firm Registration No : 112891W  
(Chartered Accountants)

V. R. Bhabhra  
Partner  
Membership No : 46043

Place: Mumbai  
Dated: 28th May, 2022

For and on behalf of Board of Directors of Sanchay Fivest Limited

Narish Kumar Sharma      Nandam Kumar Sharma  
Director                              Director  
DIN : 00794218                  DIN : 00794167

Place: Mumbai  
Dated: 28th May, 2022





**SANCHAY FINVEST LIMITED**  
**Statement of Cash Flow for the year ended 31st March 2022**

(Rupees in Lakhs)

Particulars	As at 31-March- 2022	As at 31-March- 2021
<b>Cash flow from/(used in) operating activities</b>		
Profit / (loss) before tax	0.45	23.10
<b>Adjustment for:</b>		
Depreciation and amortisation expenses	1.55	0.37
Interest income	(2.84)	(6.56)
<b>Movement in working capital:</b>		
(Increase)/decrease in current investment	(75.21)	(38.47)
(Increase)/decrease in trade receivables	(24.98)	98.51
(Increase)/decrease in current tax assets	(0.08)	(0.26)
Increase/(decrease) in trade payable	61.21	(45.48)
Increase/(decrease) in other financial liabilities	35.72	0.74
Increase/(decrease) in other liabilities	5.47	(0.28)
<b>Cash generated from/(used in) operations</b>	<b>1.29</b>	<b>31.67</b>
Income tax paid	-	-
<b>Cash generated from/(used in) operations</b>	<b>1.29</b>	<b>31.67</b>
<b>Cash flow from/(used in) investing activities</b>		
Loans given	-	(42.42)
Purchase of Fixed Assets	(4.08)	-
Repayment of loan given	5.23	-
Investment in fixed deposit	(2.56)	(2.76)
Interest received	2.84	6.56
<b>Cash generated from/(used in) investing activities</b>	<b>1.43</b>	<b>(38.62)</b>
<b>Cash generated from/(used in) financing activities</b>	<b>-</b>	<b>-</b>
<b>Net increase/(decrease) in cash and cash equivalents</b>	<b>2.72</b>	<b>(6.96)</b>
Cash and cash equivalents at the beginning of the year	5.28	12.23
Cash and cash equivalents at the end of the year	8.00	5.28

For and on behalf of Board of Directors of  
Sanchay Finvest Limited

Naresh Kumar Sharma  
Director  
DIN : 00794218

Place: Mumbai  
Dated: 28th May, 2022

**SANCHAY FINVEST LIMITED**

**Statement of changes in equity for the year ended 31st March 2022**

(11)					
<b>A.</b>	<b>Equity share capital</b>				
	<b>Balance at the beginning of the reporting year</b>	<b>Number of shares</b>	<b>Value</b>		
	At 1 April 2020	3,150,000	31,500,000		
	Issue of share capital	-	-		
	At 31 March 2021	3,150,000	31,500,000		
<b>B.</b>	<b>Other equity</b>				
	<b>Particulars</b>	<b>Reserves and surplus</b>			<b>Total</b>
		<b>Securities Premium</b>	<b>General Reserves</b>	<b>Surplus/(Deficit) in the Statement of Profit &amp; Loss</b>	
	At 1st April 2021	12,000,000	4,781,112	(17,427,399)	(646,297)
	Profit/(loss) for the year 2021-22			25,568	25,568
				-	
	At 31 March 2022	12,000,000	4,781,112	(17,401,831)	(620,719)

**SANCHAY FINVEST LIMITED**

**Notes to the financial statements as at 31st March 2022**

(4) Investments



Non current

Particulars	As at 31-March-2022	As at 31-March-2021
<b>Investment in Equity Shares</b>		
Fully paid up, Quoted	1,072,965	1,072,965
Fully paid up, Unquoted, Associate Company		
Investment in Associate Company		
800100 equity shares of Sanchay Fincom Limited, face value Rs. 10 each	8,001,000	8,001,000
	<b>9,073,965</b>	<b>9,073,965</b>

Market value of quoted investment

Current

Particulars	As at 31-March-2022	As at 31-March-2021
<b>Investment in Equity Shares</b>		
Fully paid up, Quoted		7,384,652
	-	<b>7,384,652</b>

(5) Deferred Tax Asset

Particulars	As at 31-March-2022	As at 31-March-2021
Difference arising on account of depreciation		23562
	-	<b>23,562</b>

(6) Other assets

Non current

Particulars	As at 31-March-2022	As at 31-March-2021
Deposits with stock exchanges	13,275,000	13,275,000
	<b>13,275,000</b>	<b>13,275,000</b>

(7) Trade Receivables

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Current

Particulars	As at 31-March-2022	As at 31-March-2021
Secured, considered good		
Receivable from Associate Company		-
Others	2,343,622	2,876,914
Unsecured, considered good		
Receivable from Associate Company	-	-
Others	2,831,229	-
	5,174,851	2,876,914
Less: Provision for doubtful Debt	-	-
	5,174,851	2,876,914

(8) Cash and bank balances

Particulars	As at 31-March-2022	As at 31-March-2021
<b>Cash and cash equivalents</b>		
Cash on hand	28,755	127,356
Balances with banks		
In current accounts	770,811	400,259
	799,566	527,615
<b>Other bank balances</b>		
Fixed deposit	5,065,728	4,809,972
	5,865,294	5,337,587

(9) Loans

Current

Particulars	As at 31-March-2022	As at 31-March-2021
Unsecured, considered good		
Advance recoverable in cash or kind	6,177,315	6,700,000
Advance BSE (Revocation Fees)		



	220,600	220,600
Advance to employees	118,800	118,800
	<b>6,516,715</b>	<b>7,039,400</b>

**SANCHAY FINVEST LIMITED**

Notes to the financial statements as at 31st March 2022

(10) Equity share capital

Particulars	Numbers of shares	As at 31-March-2022	As at 31-March-2021
Equity shares of Rs.10 each	8,000,000	80,000,000	80,000,000
		<b>80,000,000</b>	<b>80,000,000</b>
Issued, subscribed and paid-up: Equity shares of Rs.10 each par value	3,150,000	31,500,000	31,500,000
		<b>31,500,000</b>	<b>31,500,000</b>

**Rights, preferences and restrictions attached to equity shares**

The Company has only one class of shares referred to as equity shares having a par value of Rs. 10 per share. Each holder of equity share(s) is entitled to one vote per share. The final dividend, if any, proposed by the board of directors is subject to the approval of the shareholders in the ensuing annual general meeting. In the event of liquidation of the Company, the holders of equity shares will be entitled to receive remaining assets of the Company, after distribution of all preferential amounts in proportion to their shareholding.

**Details of shareholders holding more than 5% equity shares in the Company on reporting date**

Name of the shareholders	Numbers of shares	Percentage of shareholding as at 31-March-2021	Percentage of shareholding as at 31-March-2020
Sujala Industrial Supplying Pvt Ltd.	1,085,450	34%	28%
Manish Kumar Sharma	493,700	16%	16%
Narottam Kumar Sharma	300,000	10%	10%

**The reconciliation of the number of shares outstanding on reporting date**

Particulars	As at 31-March-2022	As at 31-March-2021
Shares at the beginning of the year	3,150,000	31,500,000
Add : Shares issued during the year	-	-

Shares at the end of the year	<b>3,150,000</b>	<b>31,500,000</b>
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**SANCHAY FINVEST LIMITED**

Notes to the financial statements as at 31st March 2022

F (13)	<b>Trade Payables</b>			
	<b>Non current</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Total outstanding dues of micro and small enterprises			
	Others	-	-	
		-	-	
	<b>Current</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Total outstanding dues of micro and small enterprises	-	-	
	Others	20,183,894	14,062,970	
		<b>20,183,894</b>	<b>14,062,970</b>	
F (14)	<b>Other financial liabilities</b>			
	<b>Non current</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Others	-	-	
		-	-	
	<b>Current</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Accrued Expenses	894,448	822,716	
	Loan From Director	3,500,000	-	
		<b>4,394,448</b>	<b>822,716</b>	
(14)	<b>Other liabilities</b>			
	<b>Non-Current:</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Others	-	-	
		-	-	
	<b>Current:</b>			
	<b>Particulars</b>	<b>As at</b>	<b>As at</b>	
		<b>31-March-2022</b>	<b>31-March-2021</b>	
	Bank Overdraft	547,318	-	
	(Due to Reconciliation)	547,318	-	

(16) Revenue from Operations

Particulars	For the year ended 31-March-2022	For the year ended 31-March-2021

Brokerage Income	2,125,054	1,777,338
Sale of Shares (Delivery)	3,446,702	5,641,694
	<b>5,571,756</b>	<b>7,419,032</b>

## (17) Other Income

Particulars	For the year ended 31-March-2022	For the year ended 31-March-2021
Interest income	284,174	655,509
Dividend on shares	63,012	13,052
Miscellaneous income	15,164	66,175
	<b>362,350</b>	<b>734,736</b>

## (18) Employee benefits expense

Particulars	For the year ended 31-March-2022	For the year ended 31-March-2021
Salaries and Wages	167,000	120,000
	<b>167,000</b>	<b>120,000</b>

## (19) Finance costs

Particulars	For the year ended 31-March-2022	For the year ended 31-March-2021
Bank charges	1159	413
	<b>1,159</b>	<b>413</b>

## (20) Other expenses

Particulars	For the year ended 31-March-2022	For the year ended 31-March-2021
Legal and professional fees	301,350	500551
Payment to auditors :		
as auditors	85,000	100300
Demat Charges	88,904	81668.88
Computer & Software Expenses		85000
Insurance Expenses	15,901	15901
Printing and Stationary	23,000	28065
ROC filing Fees	84,600	-
Office expenses	43,074	-
Listing Fees (BSE)	3,422,440	354000
Society Maintenance Charges	116,586	121882
REGISTRAR & TRANSFER AGENT EXPS	50,000	-
Electricity Expenses	106,358	125384

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Travelling Expenses and Conveyance	6,600	-
Telephone Expenses	73,504	71563
Miscellaneous Expenses	138,809	281038
Exchange Dues and Lease line Charges NSE	1,008,243	801486
	<b>6,565,459</b>	<b>2,526,909</b>

**SANCHAY FINVEST LIMITED**

Notes to the financial statements as at 31 March 2022

**(21) Contingent liability**

The Company has no contingent liability.

**(22) Financial risk management objectives and policies**

The risk management policies of the Company are established to identify and analyse the risks faced by the Company, to set appropriate risk limits and controls, and to monitor risks and adherence to limits. Risk management policies and systems are reviewed regularly to reflect changes in market conditions and the Company's activities.

The Management has overall responsibility for the establishment and oversight of the Company's risk management framework.

**Capital management**

For the purpose of the Company's capital management, capital includes issued equity capital, share premium and all other equity reserves attributable to the equity holders of the parent. The primary objective of the Company's capital management is to maximise the shareholder value.

No changes were made in the objectives, policies or processes for managing capital during the years ended 31 March 2021.

**(23) Income tax**

The major components of income tax expense for the years are:

**Profit or loss section**

Particulars	For the year ended 31-March-2022	For the year ended 31-March- 2021
<b>Income tax:</b>		
Current income tax charge	-	-
Adjustments in respect of short provision of income tax of previous year	-	-
<b>Deferred tax:</b>		
Relating to origination and reversal of temporary differences	19833	18,537
<b>Income tax expense reported in the statement of profit or loss</b>	<b>19,833</b>	<b>18,537</b>

The current tax has not been provided as the company has been incurring losses as per tax.

Deferred tax assets has been reversed in respect of depreciation arising due to timing differences.

(24)	<b>Earning per share</b>			
	Basic EPS amounts are calculated by dividing the profit for the year attributable to equity holders by the weighted average number of equity shares outstanding during the year.			
	Diluted EPS amounts are calculated by dividing the profit attributable to equity holders by the weighted average number of equity shares outstanding during the year plus the weighted average number of equity shares that would be issued on conversion of all the dilutive potential equity shares into equity shares.			
	The following reflects the income and share data used in the basic and diluted EPS computations:			
	<b>Particulars</b>	<b>For the year ended 31-March-2022</b>	<b>For the year ended</b>	
	Profit attributable to equity holders of the parent for basic earnings	25,568	2,291,373	
	Weighted average number of equity shares for basic EPS*	3,150,000	3,150,000	
	Weighted average number of equity shares adjusted for the Face value per share	3,150,000	3,150,000	
		10	10	
	Basic earning per share	0.01	0.73	
	Diluted earning per share	0.01	0.73	
	* There have been no other transactions involving equity shares or potential equity shares between the reporting date and the date of authorisation of these financial statements.			
(25)	<b>Events Occurring After the Balancesheet date</b>			
	No subsequent event has been observed which may require an adjustment to the statement of financial position			
	As per our report of even date			
	For V.R.BHABHA & Co.	For and on behalf of Board of Directors of Sanshay Flvest Limited		
	Firm Registration No : 112861W (Chartered Accountants)			
	V. R. Bhabha	Naresh Kumar Sharma	Narotam Kumar Sharma	
	Partner	Director	Director	
	Membership No : 46043	DIN : 00794218	DIN : 00784167	
	Place: Mumbai	Place: Mumbai		
	Dated: 20th May, 2022	Dated: 28th May, 2022		



**SANCHAY FINVEST LIMITED**  
**Notes to the financial statements as at 31 March 2022**

**26 Related party relationships and transactions**

Ind AS 24 defines a related party as a person or entity that is related to the reporting entity and it includes (a) a person or a close member of that person's family if that person: (i) has control or joint control over the reporting entity, (ii) has significant influence over the reporting entity, or (iii) is a member of the key management personnel of the reporting entity or of a parent of the reporting entity. (b) An entity is related to the reporting entity if any of the following conditions apply: (i) The entity and the reporting entity are members of the same group. (ii) One entity is an associate or joint venture of the other entity (iii) Both entities are joint ventures of the same third party. (iv) One entity is a joint venture of a third entity and the other entity is an associate of the third entity. (v) The entity is a joint-employment benefit plan for the benefit of employees of either the reporting entity or an entity related to the reporting entity. If the reporting entity is itself such a plan, the sponsoring employers are also related to the reporting entity. (vi) The entity is controlled or jointly controlled by a person identified in (a). (vii) A person identified in (a) (i) has significant influence over the entity or is a member of the key management personnel of the entity (or of a parent of the entity).

**A Related Parties**

**a Associate Company**

Sanchay Fincom Ltd

**b Other related parties**

**Key Management Personnel**

Name of Related Party	Relationship
Narmada Sharma	Director Relative
Nareesh Kumar Sharma	Director
Naroban Kumar Sharma	Director
Nareesh Kumar Sharma Huf	Director Relative

**Transactions during the year with related parties**

Name of the Party	Nature of Transactions	For the year ended 31-March-2022	For the year ended 31-March-2021
Narmada Sharma	Brokerage Income	317,266	2,251
Nareesh Kumar Sharma Huf		-	-

**Balance outstanding of related parties**

Name of the Party	Receivable / (Payable)	As at 31-Mar-22	As at 31-Mar-21
Narmada Sharma	Receivable / (Payable)	(15,609,454)	(9,650,799)
Nareesh Kumar Sharma Huf	Receivable / (Payable)	-	-
Sanchay Fincom Ltd	Receivable / (Payable)	2342622	(692,129)

As per our report of even date

For Y.R.BHABHRA & Co.  
 Firm Registration No : 112861W  
 (Chartered Accountants)

V. R. Bhavsra  
 Partner  
 Membership No : 46043

Place: Mumbai  
 Dated: 28th May, 2022

For and on behalf of Board of Directors of Sanchay Finvest Limited

Nareesh Kumar Sharma  
 Director  
 DIN : 00794218

Place: Mumbai  
 Dated: 28th May, 2022

Naroban Kumar Sharma  
 Director  
 DIN : 00784167



**SANCHAY FINVEST LIMITED**

**CIN: L67120MP1991PLC006650**

**REG OFFICE:- 209, RAJANI BHUVAN, 569 M.G. ROAD INDORE MP 452001 IN**

**ATTENDANCE SLIP**

**31ST ANNUAL GENERAL MEETING 2021-2022**

I hereby record my presence at the 31<sup>st</sup> Annual General Meeting of the Company to be held on Thursday, 29<sup>th</sup> September, 2022 at registered office of the company 209, Rajani Bhuvan, 569 M.G. Road Indore MP 452001 IN. At 2.00 P.M.

Name of the Member: \_\_\_\_\_

Folio/Client ID No.: \_\_\_\_\_

Name of the Proxy/Representative (in Block Letters)

(To be filled in if the Proxy/Representative attends

Instead of the Member) \_\_\_\_\_

I certify that I am a member / proxy / authorized representative for the member of the Company.

Signature of the Member or Proxy/Representative: \_\_\_\_\_

**Note:**

- 1) Members are requested to bring their copies of the Annual Report to the meeting, since further copies will not be available.
- 2) The Proxy, to be effective should be deposited at the Registered Office of the Company not less than **FORTY-EIGHT HOURS** before the commencement of the meeting.
- 3) A Proxy need not be a member of the Company.
- 4) In the case of joint holders, the vote of the senior who tenders a vote, whether in person or by Proxy, shall be accepted to the exclusion of the vote of the other joint holders. Seniority shall be determined by the order in which the names stand in the Register of Members.
- 5) The submission by a member of this form of proxy will not preclude such member from attending in person and voting at the meeting.

**PROXY FORM**  
**31st ANNUAL GENERAL MEETING**

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

Name of the Company: **SANCHAY FINVEST LIMITED**

Registered office:- 209, Rajani Bhuvan, 569 M.G. Road, Indore, Madhya Pradesh, 452001 .

Tel.No.:- 0731-2432106,432106, E-Mail:- [sanchaay@gmail.com](mailto:sanchaay@gmail.com) Website: [www.sanchayfinvest.in](http://www.sanchayfinvest.in)

Name of the Member (s): \_\_\_\_\_

Registered Address: \_\_\_\_\_

Email-Id: \_\_\_\_\_

Folio No/Client ID: \_\_\_\_\_ DP ID: \_\_\_\_\_

I/We, being the member (s) holding \_\_\_\_\_ shares of the above named company, hereby appoint,

1. Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Id: \_\_\_\_\_

Signature \_\_\_\_\_, or failing him / her

2. Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Id: \_\_\_\_\_

Signature \_\_\_\_\_, or failing him / her

3, Name: \_\_\_\_\_

Address: \_\_\_\_\_

E-mail Id: \_\_\_\_\_

Signature \_\_\_\_\_, or failing him / her

as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the 31st Annual General Meeting of Sanchay Finvest Limited to be held on Thursday, 29th September, 2022 at 02.00 p.m. at registered office i.e. 209, Rajani Bhuvan, 569 M.G. Road, Indore, Madhya Pradesh, 452001. And at any adjournment thereof in respect of such resolutions as are indicated below:

Sr. No.	Resolutions	For	Against	Abstain
<b>Ordinary Business</b>				
1)	To consider and adopt the audited financial statement of the Company for the financial year ended March 31, 2022 and the reports of the Board of Directors and Auditors thereon; in this regard, to consider and if thought fit, to pass, with or without modification(s), the following resolutions as Ordinary Resolutions			
2)	To re-appoint the auditors of the Company and to fix their remuneration and to pass the following resolution as an Ordinary Resolution:			
<b>Special Businesses</b>				
3)	Re-Appointment of Mr. Naresh Kumar Sharma (DIN: 00794218) - as Managing Director.			

Signed this \_\_\_\_\_ day of \_\_\_\_\_ 2022

Affix Revenue Stamp
---------------------------

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

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

## FORM NO.MGT-12 POLLING PAPER

[Pursuant to section 109 (5) of the Companies Act, 2013 and Rule 21 (1) (c) of the Companies (Management and Administration) Rules, 2014]

Name of the Company: **SANCHAY FINVEST LIMITED**  
 CIN: **L67120MP1991PLC006650**  
 Registered Office: **209, RAJANI BHUVAN, 569M:G. ROAD INDORE Indore MP 452001 IN**  
 Website: **<http://www.sanchayinvest.in>**  
 Email : **sanchaay@gmail.com**

### BALLOT PAPER

Sr. No.	Particulars	Details
<b>1</b>	Name of the First-named Shareholder (in BLOCK letters)	
<b>2</b>	Postal address	
<b>3</b>	Registered Folio No./ *DP ID and Client ID No. (*Applicable to investors holding shares in dematerialized form)	

I hereby exercise my vote in respect of Ordinary/ Special Resolution/s enumerated below by recording my assent or dissent to the said resolution in the following manner:

Sr. No.	Resolutions	No. of shares held by me	I assent to the resolution	I dissent from the resolution
<b>ORDINARY BUSINESS</b>				
1	To consider and adopt the Audited Statement of the Company for the financial year ended 31st March, 2022, the Reports of the Board of Directors and Auditors thereon			
2	To re-appoint the auditors of the Company and to fix their remuneration and to pass the following resolution as an Ordinary Resolution			
<b>Special Business</b>				
3	Re-Appointment of Mr. Naresh Kumar Sharma (DIN: 00794218) - as Managing Director.			

Place :



**SANCHAY FINVEST LIMITED**

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Date:

(Signature of the shareholder)