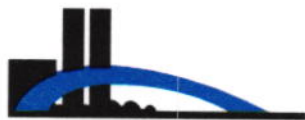


SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)



REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR - V, SALT LAKE CITY, KOLKATA - 700 091

PH. :4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www@ccapltd.in, CIN - L45203WB1972PLC028349

Dated: 25.07.2024

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range, Dalhousie
Kolkata - 700001

Scrip Code: BSE: 526839

Scrip Code: CSE: 13077

Dear Sir,

Sub- Disclosures under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015

These are in reference to the Disclosures required under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015.

1. This is to inform you that Ms. Vandana Nahata bearing Membership No. 302614 A Practicing Chartered Accountant has been appointed to act as Scrutinizer for E-voting process at the 52nd Annual General Meeting of the Company to be held on Tuesday 24th September, 2024.
2. Disclosure regarding Order under Section 206(4) of The Companies Act, 2013 and Summon under Section 207(3)(b) of The Companies Act, 2013.
3. Mr. Biswanath Chattopadhyay, Partner of our Statutory Audit Firm M/s Basu Chanchani & Deb, Chartered Accountants will be signing signatory who had previously signed audit report for the company.
4. Copy of Board Evaluation Policy hereby attached being taken on Board.

Thanking You,
Yours faithfully,

For **SHELTER INFRA PROJECTS LIMITED**

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

Encl: as above

Date- 16/07/2024

To,
The Board of Directors of
M/S SHELTER INFRA PROJECTS LIMITED
ETERNITY BUILDING DN-1, SECTOR - V,
SALT LAKE, KOLKATA -700091

Dear Sir's/Madam,

Sub: Consent to act as Scrutinizer for E-voting process at the 52nd Annual General Meeting of the Company.

With reference to the above, Ms. Vandana Nahata, Chartered Accountant in Whole Time Practice having Membership No.: 302614, do hereby confirm my willingness and give my consent to act as Scrutinizer to scrutinize the E-voting process at the 52nd Annual General Meeting of your Company to be held on Tuesday 24th September, 2024.

Thanking you.

For Vandana Nahata & Co.

Chartered Accountants



Vandana Nahata

CA Vandana Nahata
Practicing Chartered Accountant
Membership No. 302614

SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)

REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR - V, SALT LAKE CITY, KOLKATA - 700 091

PH. :4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www@ccapltd.in, CIN - L45203WB1972PLC028349



July 25, 2024

To,
CA Vandana Nahata
M/s. Vandana Nahata & Co.
Practicing Chartered Accountants
18, Mukhram Kanoria Road, 6th Floor,
Block – A, Howrah- 711101

Dear Madam,

Sub: Letter of appointment of Scrutinizer for E-voting at the 52nd Annual General Meeting of the Company.

We are pleased to appoint you as Scrutinizer for E-Voting process at the 52nd Annual General Meeting of the Company to be held on Tuesday 24th September, 2024 in compliance with Rule 20 of Companies (Management and Administration) Rules, 2014 in a fair and transparent manner.

Please acknowledge the same.

Thanking you,

For **SHELTER INFRA PROJECTS LIMITED**

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)

REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR - V, SALT LAKE CITY, KOLKATA - 700 091

PH. :4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www@ccapltd.in, CIN - L45203WB1972PLC028349



Dated: 25.07.2024

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range, Dalhousie
Kolkata - 700001

Scrip Code: BSE: 526839

Scrip Code: CSE: 13077

Dear Sir,

Sub- Disclosure under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015

In pursuant to Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 this is in reference to the notice received by the company by Dr. Abhishek Kumar, ICLS, Assistant Registrar of Companies, Ministry of Corporate Affairs Mangal Tower, 4th Floor, Old Hazaribagh Road Near Kanta Toli Chowk Ranchi, Jharkand-834001 in Order under Section 206(4) of the Companies Act, 2013 i.e. Inquiry against the company in exercise of the powers under section 206(4) of the Companies Act, 2013 as per the notice letter dated 12.02.2024 whereby we were asked to submit documents as required for inquiry within 10 days from the date of issue of the notice. Since the notice was received beyond expected delivery time, we could not send all the required documents within time frame and had requested for granting some more days for submission of papers by our mail dated 21.02.2024 but on account of Summon received under Section 207(3)(b) of the Companies Act, 2013 on dated 22.02.2024 in exercise of powers vested Under section 207(3)(b) of the Companies Act, 2013 directors/officers/auditors are hereby summoned to appear personally before the Inquiry Officer in his chamber on 29.02.2024 at 01:00 p. m. at the office of the Registrar of Companies-cum-Official Liquidator,. Jharkhand, Ministry of Corporate Affairs; Mangal Tower; 4th Floor, Old Hazaribag Road; Near Kanta Toli Chowk, Ranchi 834001, Jharkhand for their examination on oath and not to depart until they receive permission to do so. On 26.02.2024 we have sent the documents in pen drive that we have arranged so far along with mail. In Honour of the Summons Directors with KMPs who had been summoned along with the required documents of the Directors who cant be able to appear physically duly appeared before the concerned authority as on specified date and time with rest of the documents pending and the matter is currently under observation.

We request to take same in the records.

SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)



REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR - V, SALT LAKE CITY, KOLKATA - 700 091

PH. :4003 2290

E-MAIL : info@ccapitd.in, WEBSITE : www@ccapitd.in, CIN - L45203WB1972PLC028349

Thanking You,
Yours faithfully,

For SHELTER INFRA PROJECTS LIMITED

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

BASU CHANCHANI & DEB

CHARTERED ACCOUNTANTS

BASU HOUSE

3, CHOWRINGHEE APPROACH, KOLKATA - 700 072

PHONE : 033-2212-6253, 2212-8016

E-mail : la.bcd1973@gmail.com

www.basuchanchanianddeb.org

Ref.No.GB/07/17/01/24-25

Date : 17.07.2024

To

Shelter Infra Projects Limited
Eternity, DN-1, Sector-V, Salt Lake City,
Kolkata-700 091.

Email Id : sipfinance72@gmail.com / info@ccapltd.in / sipl72@gmail.com

Dear Sir,

Ref : Your Email dated 15.07.2024 at 1.02 PM.

With reference to above this is for information of your goodself that it is Mr. Anjan Kumar Ghosh (FCA) who succeeded Late Samir Kumar Ghosh as Partner of Basu Chanchani & Deb with effect from 19.06.2024.

Regarding further feedback:

- i) You are already aware of client profile of Basu Chanchani & Deb which hardly calls for re-submission.
- ii) Mr. Anjan Kumar Ghosh, the new incumbent started his carrier in "Tata Groups" and occupied senior position therein. He left the said groups in late nineties and joined G.Basu & Co., Chartered Accountants as a Manager. After 10 years of service he was promoted to the office of Partner of G.Basu & Co.
- iii) He left the G.Basu & Co. on 19.06.2024 and joined Basu Chanchani & Deb as a full-fledged Partner.
- iv) Your files would be handled by Mr. Biswanath Chattopadhyay (FCA), Partner in future, who is already handled with your file.

Hope the above will suffice your required information.

Thanking you,

Yours faithfully,
For Basu Chanchani & Deb
Chartered Accountants.

Anusree Lahiri

(Anusree Lahiri)
Administrative Manager.

Ref.No.BCD/07/17/02/24-25

Date : 17.07.2024

To
Shelter Infra Projects Limited
Eternity, DN-1, Sector-V, Salt Lake City,
Kolkata-700 091.
Email Id : info@ccapltd.in

Attn : Ms. S Neogy, CS.

Dear Sir/Madam,

Ref : Your Email dated 17.07.2024 at 2.50 PM.

We acknowledge the receipt of captioned mail in which you wanted the profile of Mr. Biswanath Chattopadhyay.

Please note that our Mr. Biswanath Chattopadhyay, Partner, is not new to your company, as he has earlier signed your accounts as well as attended board meeting.

Nevertheless as you want to know about him, few important particulars on Mr. Biswanath Chattopadhyay is provided below:

- 1) Mr. Biswanath Chattopadhyay is an FCA. Being Partner of Basu Chanchani & Deb he is serving more than 10 years. His Membership No. is 051800.
- 2) Before joining in this firm, he was an Assistant General Manager of ANDREW YULE & CO. LTD. (A Govt. of India Enterprise), where he worked around 30 years.
- 3) Mr. Chattopadhyay has wide experience in audit and MCS assignments. He has handled assignments of foreign countries in USA, Europe, Africa, Middle East and South Asia.

Hope the above will suffice your required information.

Thanking you,

Yours faithfully,
For Basu Chanchani & Deb
Chartered Accountants.



(Anusree Lahiri)
Administrative Manager.



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349

Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

BOARD EVALUATION POLICY

This policy is framed to encourage open and effective evaluation of performance of Directors of M/s Shelter Infra Projects Limited (the Company) and to lay down the guidelines and mechanism for undertaking programme of evaluation. The Company believes that performance evaluation is a key, by which the Board can recognize and address corporate governance challenges and enhance value to the Company. The evaluation of Board of Directors involves board members undertaking a constructive but critical review of their own performance, identifying their strengths and weaknesses.

The primary objective of the Policy is to provide a framework and set standards for the evaluation of the Board as a whole and each Director individually. Your Company aims to achieve a balance of merit, experience and skills on the Board. The policy is to assess and enhance the effectiveness of the Board as a whole. Individual Board members are assessed on their effective contribution and commitment to their role and responsibilities as Directors. The Board evaluation process shall be carried out by the Nomination and Remuneration Committee.

OBJECTIVES OF EVALUATION

The objective to undertake evaluation of Board and individual directors are as under:

- To ensure commitment to performance management;
- To review challenges in the dynamics of the Board or among the Board and management;
- To enhance good corporate governance;
- To develop appropriate skills, competencies and motivation on the Board.→

Role of the Nomination and Remuneration Committee (NRC):

NRC shall formulate of criteria for evaluation of performance of independent directors and the board of directors. NRC shall carry out evaluation of every director's performance. NRC shall determine whether to extend or continue the term of appointment of the independent director, on the basis of the report of performance evaluation of independent directors.



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349

Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

Role of independent directors:

a. In the meeting of independent directors of the company (without the attendance of non-independent directors and management), such directors shall:

i. review the performance of non-independent directors and the Board as a whole.

ii. review the performance of the Chairperson of the company, taking into account the views of executive directors and non-executive directors.

iii. assess the quality, quantity and timeliness of flow of information between the company management and the Board that is necessary for the Board to effectively and reasonably perform their duties.

b. The independent directors shall bring an objective view in the evaluation of the performance of board and management.

Evaluation of independent directors: The performance evaluation of independent directors shall be done by the entire Board of Directors, excluding the independent director being evaluated.

Disclosure requirements:

A statement indicating the manner in which formal annual evaluation has been made by the Board of its own performance and that of its committees and individual directors shall be included in the report by Board of Directors placed in the general meeting.

Evaluation Process

The evaluation of the Board involves at different levels which includes Board as a whole, Committees of the Board, Individual Directors and Chairperson (including Chairperson, Independent Directors, Non-independent directors, etc.).

Clear identification of objective is key to streamlining the process of evaluation, analyzing the results and taking appropriate and corrective action which is segregated into two General and Specific based on recent events, new issues of concern which mandatory required attention to the Board.

The criteria for every evaluation may be decided at every level depending on the functions, responsibilities, competencies required, nature of business, etc. Like for Board as different competent individuals required for the functioning of organization. The task is to evaluate Whether Board as a whole has directors with a proper mix of competencies to conduct its affairs effectively. Experience of each Board Members has to be checked.



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349

Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

Meeting

Whether the meeting and the agenda for the meeting has been in accordance with The Companies Act, 2013 and the LODR Regulations.

Following things need to be evaluated

1. Whether the agenda is circulated well before the meeting
2. Whether the agenda has all relevant information to take decision on the matter
3. Whether the agenda is up to date, regularly reviewed and involves major substantial decisions
4. Whether the quality of agenda and Board papers is up to the mark (explains issues properly, not overly lengthy, etc.)
5. Whether outstanding items of previous meetings are followed-up and taken up in subsequent agendas
6. Whether the time allotted for the every item (especially substantive items) in the agenda of the meeting is sufficient for adequate discussions on the subject
7. Whether the Board is able to finish discussion and decision on all agenda items in the meetings
8. Whether adequate and timely inputs are taken from the Board members prior to setting of the Agenda for the meeting
9. Whether the agenda includes adequate information on Committee's activities

To check that the discussions and environment of meeting is satisfactory to reach at decisions. Minutes is properly recorded and circulated. Role and responsibilities of the Board is same as per The Companies Act, 2013 and the LODR Regulations, performance to be evaluated Whether significant time of the Board is being devoted to management of current and potential strategic issues. Whether various scenario planning is used to evaluate strategic risks. Whether the Board overall reviews and guides corporate strategy, major plans of action, risk policy, annual budgets and business plans, sets performance objectives, monitored implementation and corporate performance, and oversees major capital expenditures.

Governance and compliance to be evaluated

1. Whether adequate time of the Board is being devoted to analyze and examine governance and compliance issues
2. Whether the Board monitors the effectiveness of its governance practices and makes changes as needed



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349

Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

3. Whether the Board ensures the integrity of the entity's accounting and financial reporting systems, including the independent audit, and that appropriate systems of control are in place, in particular, systems for risk management, financial and operational control, and compliance with the law and relevant standards.

4. Whether the Board oversees the process of disclosure and communications

Whether the Board evaluates and analyses the compliance certificate from the auditors / practicing company secretaries regarding compliance of conditions of corporate governance.

Board undertakes a review of the high risk issues impacting the organization regularly with positive attitude. the Board shall reviews on quarterly basis the grievance redressal mechanism of investors, details of grievances received, disposed of and those remaining unresolved. Conflict of interest needs to be checked whether addressed by the Board. Stakeholder value is the base aim. To serve the aim Board acts on a fully informed basis, in good faith, with due diligence and care, with high ethical standards and in the best interest of the entity and the stakeholders. To evaluate Whether the Board treats shareholders and stakeholders fairly where decisions of the board of directors may affect different shareholder/ stakeholder groups differently.

Evaluation of performance of the management and feedback to be taken in regard to -

1. Whether the Board evaluates and monitors management, especially the WTD regularly and fairly and provides constructive feedback and strategic guidance
2. Whether the measures used are broad enough to monitor performance of the management
3. Whether the management's performance is benchmarked against industry peers
4. Whether remuneration of the management is in line with its performance and with industry peers
5. Whether remuneration of the Board and the management is aligned with the longer term interests of the entity and its shareholders.
6. Whether the Board selects, compensates, monitors and, when necessary, replaces key managerial personnel based on such evaluation.
7. Whether the Board 'steps back' to assist executive management by challenging the assumptions underlying strategy, strategic initiatives (such as acquisitions), risk appetite, exposures and the key areas of the entity's focus.

Board works on independent basis and having actively involve in clear exchange of informations with management. Whether adequate secretarial and logistical support and



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349

Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

sufficient funds are made available to the Board for conducting its meeting effectively. Adequate induction and professional development programmes are made available to new and old directors. Continuing directors training is provided to ensure that the members of board of directors are kept up to date.

Composition, Effectiveness and Structure as per the Companies Act, 2013 and the LODR Regulations.

Individual Directors and Chairperson (including Chairperson, Independent Directors, Non-independent directors, etc.)

General

Qualifications, Experience, Knowledge and Competency as per the Companies Act, 2013 and the LODR Regulations.

Basis of Evaluation

- i. How the person fares across different competencies as identified for effective functioning of the entity and the Board.
- ii. Whether the person has sufficient understanding and knowledge of the entity and the sector in which it operates

Fulfillment of functions: Whether the person understands and fulfills the functions to him/her as assigned by the Board and the law

Ability to function as a team: Whether the person is able to function as an effective team-member

Initiative: Whether the person actively takes initiative with respect to various areas

Availability and attendance: Whether the person is available for meetings of the Board and attends the meeting regularly and timely, without delay.

Commitment: Whether the person is adequately committed to the Board and the entity

Contribution: Whether the person contributed effectively to the entity with integrity.



SHELTER INFRA PROJECTS LIMITED

CIN: L45203WB1972PLC028349
Reg off: Eternity Building DN-1,
Salt Lake, Kolkata -700091

Independent director and Chairperson should be independent and Impartial and committed to the board.

Method of evaluation: internally and external experts through oral and written manner. Action plan has been made on the basis of area of improvement . Review has to be done on annual basis and any other time required to do so.

On behalf of the Board of Directors
For Shelter Infra Projects Limited

KAMAL KISHORE CHOWDHURY
(WHOLE TIME DIRECTOR)
DIN- 06742937

SANKALAN DATTA
(DIRECTOR)
DIN - 02478232

Date: 25.07.2024
Place: KOLKATA