FORM NO. MGT-7

[Pursuant to sub-Section(1) of section 92 of the Companies Act, 2013 and sub-rule (1) of rule 11of the Companies (Management and Administration) Rules, 2014]



Annual Return

(other than OPCs and Small **Companies**)

Form language Refer the instruction kit for filing the form.

I. REGISTRATION AND OTHER DETAILS

i) * Corporate Identification Number (CIN) of the company		U5110	9DL1992PTC290630	Pre-fill
Global Location Number (GLN)	of the company			
* Permanent Account Number (P.	AN) of the company	AAACI	_5416A	
(ii) (a) Name of the company		LTC CO	OMMERCIAL CO PVT LTD	
(b) Registered office address				
KH,NO. 180 1ST FLOOR, BIJAPUR BEHIND GARUD MOTORS DELHI North West Delhi	VILLAGE BUDHPUR,			
(c) *e-mail ID of the company		cs.ltc@	oltcagro.in	
(d) *Telephone number with STE) code	01412	372357	
(e) Website		www.l	tcagro.com	
(iii) Date of Incorporation		16/01/	/1992	
(iv) Type of the Company	Category of the Company		Sub-category of the	Company
Private Company	Private Company Company limited by sha		Indian Non-Gove	ernment company
(v) Whether company is having share	e capital	Yes		

Yes

No

 (\bullet)

(vi) *Whether shares listed on recognized Stock Exchange(s) Yes \bigcirc (\bullet) No

(vii) *Financial year From date 01/04/2021	(DD/MM/YYYY) To date	31/03/2022 (DD/MM/YYYY)					
(viii) *Whether Annual general meeting (AGM)	held • Yes ·	No					
(a) If yes, date of AGM 29/09/20 (b) Due date of AGM 30/09/20							
(c) Whether any extension for AGM grante	ed 🔿 Yes	• No					
II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY							

*Number of business activities 5

S.No	Main Activity group code		Business Activity Code	Description of Business Activity	% of turnover of the company
1	н	Transport and storage	H6	Warehousing and storage	43.46
2	G	Trade	G1	Wholesale Trading	35.26
3	F	Construction	F1	Buildings	15.66
4	М	Professional, Scientific and Technical	M9	Other professional, scientific and technical activities	4.43
5	М	Professional, Scientific and Technical	М3	Management consultancy activities	1.19

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES (INCLUDING JOINT VENTURES)

*No. of Companies for which information is to be given 0

Pre-fill All

S.No	Name of the company	CIN / FCRN	Holding/ Subsidiary/Associate/ Joint Venture	% of shares held
1				

IV. SHARE CAPITAL, DEBENTURES AND OTHER SECURITIES OF THE COMPANY

(i) *SHARE CAPITAL

(a) Equity share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Total number of equity shares	10,000,000	10,000,000	10,000,000	10,000,000
Total amount of equity shares (in Rupees)	100,000,000	100,000,000	100,000,000	100,000,000

Number of classes

Class of Shares EQUITY SHARES	Authorised capital	Issued capital	Subscribed capital	Paid up capital
Number of equity shares	10,000,000	10,000,000	10,000,000	10,000,000
Nominal value per share (in rupees)	10	10	10	10
Total amount of equity shares (in rupees)	100,000,000	100,000,000	100,000,000	100,000,000

1

(b) Preference share capital

Particulars	Authorised capital	Issued capital	Subscribed capital	Paid-up capital
Total number of preference shares	0	0	0	0
Total amount of preference shares (in rupees)	0	0	0	0

Number of classes

Class of shares	Authorised capital	Icapila	Subscribed capital	Paid up capital
Number of preference shares				
Nominal value per share (in rupees)				
Total amount of preference shares (in rupees)				

0

(c) Unclassified share capital

Particulars	Authorised Capital
Total amount of unclassified shares	0

(d) Break-up of paid-up share capital

Class of shares	Number of shares			Total nominal amount	Total Paid-up amount	Total premium
Equity shares	Physical	DEMAT	Total			
At the beginning of the year	10,000,000	0	10000000	100,000,000	100,000,00	
Increase during the year	0	0	0	0	0	0
i. Pubic Issues	0	0	0	0	0	0
ii. Rights issue	0	0	0	0	0	0
iii. Bonus issue	0	0	0	0	0	0

iv. Private Placement/ Preferential allotment	0	0	0	0	0	0
v. ESOPs	0	0	0	0	0	0
vi. Sweat equity shares allotted	0	0	0	0	0	0
vii. Conversion of Preference share	0	0	0	0	0	0
viii. Conversion of Debentures	0	0	0	0	0	0
ix. GDRs/ADRs	0	0	0	0	0	0
x. Others, specify				0	0	
NA				0	0	
Decrease during the year	0	0	0	0	0	0
i. Buy-back of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
iii. Reduction of share capital	0	0	0	0	0	0
iv. Others, specify				0	0	
NA				Ŭ		
At the end of the year	10,000,000	0	10000000	100,000,000	100,000,00	
Preference shares						
At the beginning of the year	0	0	0	0	0	
Increase during the year	0	0	0	0	0	0
i. Issues of shares	0	0	0	0	0	0
ii. Re-issue of forfeited shares	0	0	0	0	0	0
iii. Others, specify					_	
NA				0	0	
Decrease during the year	0	0	0	0	0	0
i. Redemption of shares	0	0	0	0	0	0
ii. Shares forfeited	0	0	0	0	0	0
	Ŭ		1			
iii. Reduction of share capital	0	0	0	0	0	0
		0	0	0	0	0

SIN of the equity shares	of the company			
(ii) Details of stock spl	it/consolidation during the second seco	ne year (for each class o	f shares)	0
Class o	f shares	(i)	(ii)	(iii)
Before split /	Number of shares			
Consolidation	Face value per share			
After split /	Number of shares			
Consolidation	Face value per share			

(iii) Details of shares/Debentures Transfers since closure date of last financial year (or in the case of the first return at any time since the incorporation of the company) *

\square	Nil [Details being provided in a CD/Digital Media]) Yes	🔿 No	O Not Applicable
	Separate sheet attached for details of transfers	⊖ Yes	O No	

Note: In case list of transfer exceeds 10, option for submission as a separate sheet attachment or submission in a CD/Digital Media may be shown.

Date of the previous annual general meeting					
Date of registration of transfer (Date Month Year)					
Type of transfer 1 - Equity, 2- Preference Shares, 3 - Debentures, 4 - Stock					
Number of Shares/ Debentures/ Units Transferred		Amount per Share/ Debenture/Unit (in Rs.)			
Ledger Folio of Trans	Ledger Folio of Transferor				
Transferor's Name					
	Surname	middle name	first name		

Ledger Folio of Transferee			
Transferee's Name			
	Surname	middle name	first name

Date of registration of transfer (Date Month Year)					
Type of transfer		Equity, 2	2- Preference Shares,3 -	Debentures, 4 - Stock	
Number of Shares/ Debentures/ Units Transferred			Amount per Share/ Debenture/Unit (in Rs.)		
Ledger Folio of Transferor					
Transferor's Name	ror's Name				
	Surname		middle name	first name	
Ledger Folio of Transferee					
Transferee's Name					
	Surname		middle name	first name	

(iv) *Debentures (Outstanding as at the end of financial year)

Particulars	Number of units	Nominal value per unit	Total value
Non-convertible debentures	0	0	0
Partly convertible debentures	0	0	0
Fully convertible debentures	0	0	0
Total			0

Details of debentures

Class of debentures	Outstanding as at the beginning of the year	-	Decrease during the year	Outstanding as at the end of the year
Non-convertible debentures	0	0	0	0
Partly convertible debentures	0	0	0	0
Fully convertible debentures	0	0	0	0

(v) Securities (other than shares and debentures)

		-			
Type of	Number of	Nominal Value of	Total Nominal	Paid up Value of	Total Paid up Value
	Securities	each Unit	Value	each Unit	-
Tatal					
Total					
			e		L

V. *Turnover and net worth of the company (as defined in the Companies Act, 2013)

(i) Turnover

605,371,477.85

0

(ii) Net worth of the Company

721,959,965.32

VI. (a) *SHARE HOLDING PATTERN - Promoters

S. No.	Category	Equity		Preference	
		Number of shares	Percentage	Number of shares	Percentage
1.	Individual/Hindu Undivided Family				
	(i) Indian	6,461,600	64.62	0	
	(ii) Non-resident Indian (NRI)	0	0	0	
	(iii) Foreign national (other than NRI)	0	0	0	
2.	Government				
	(i) Central Government	0	0	0	
	(ii) State Government	0	0	0	
	(iii) Government companies	0	0	0	
3.	Insurance companies	0	0	0	
4.	Banks	0	0	0	
5.	Financial institutions	0	0	0	

6.	Foreign institutional investors	0	0	0	
7.	Mutual funds	0	0	0	
8.	Venture capital	0	0	0	
9.	Body corporate (not mentioned above)	0	0	0	
10.	Others	0	0	0	
	Total	6,461,600	64.62	0	0

Total number of shareholders (promoters)

3

(b) *SHARE HOLDING PATTERN - Public/Other than promoters

S. No.	Category	Equi	ty	Preference		
		Number of shares	Percentage	Number of shares	Percentage	
1.	Individual/Hindu Undivided Family					
	(i) Indian	3,538,400	35.38	0		
	(ii) Non-resident Indian (NRI)	0	0	0		
	(iii) Foreign national (other than NRI)	0	0	0		
2.	Government					
	(i) Central Government	0	0	0		
	(ii) State Government	0	0	0		
	(iii) Government companies	0	0	0		
3.	Insurance companies	0	0	0		
4.	Banks	0	0	0		
5.	Financial institutions	0	0	0		
6.	Foreign institutional investors	0	0	0		
7.	Mutual funds	0	0	0		
8.	Venture capital	0	0	0		
9.	Body corporate (not mentioned above)	0	0	0		
10.	Others	0	0	0		

Total	3,538,400	35.38	0	0
Total number of shareholders (other than prom	oters) 6			
Total number of shareholders (Promoters+Publi Other than promoters)	c / 9			

VII. *NUMBER OF PROMOTERS, MEMBERS, DEBENTURE HOLDERS (Details, Promoters, Members (other than promoters), Debenture holders)

Details	At the beginning of the year	At the end of the year
Promoters	3	3
Members (other than promoters)	6	6
Debenture holders	0	0

VIII. DETAILS OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

(A) *Composition of Board of Directors

Category	ategoryNumber of directors at the beginning of the year		Number of directors at the end of the year		Percentage of shares held by directors as at the end of year	
	Executive	Non-executive	Executive	Non-executive	Executive	Non-executive
A. Promoter	2	0	2	0	62.45	0
B. Non-Promoter	0	0	0	0	0	0
(i) Non-Independent	0	0	0	0	0	0
(ii) Independent	0	0	0	0	0	0
C. Nominee Directors representing	0	0	0	0	0	0
(i) Banks & FIs	0	0	0	0	0	0
(ii) Investing institutions	0	0	0	0	0	0
(iii) Government	0	0	0	0	0	0
(iv) Small share holders	0	0	0	0	0	0
(v) Others	0	0	0	0	0	0
Total	2	0	2	0	62.45	0

3

(B) (i) *Details of directors and Key managerial personnel as on the closure of financial year

Name	DIN/PAN	Designation	Number of equity share(s) held	Date of cessation (after closure of financial year : If any)
RAJESH SHARMA	00566446	Managing Director	3,446,000	
GARGI SARASWAT	02098677	Whole-time directo	2,799,600	
ANKITA KARNANI	DNJPK7016R	Company Secretar	0	

(ii) Particulars of change in director(s) and Key managerial personnel during the year

Name	beginning / during	change in decignation/	Nature of change (Appointment/ Change in designation/ Cessation)

IX. MEETINGS OF MEMBERS/CLASS OF MEMBERS/BOARD/COMMITTEES OF THE BOARD OF DIRECTORS

A. MEMBERS/CLASS /REQUISITIONED/NCLT/COURT CONVENED MEETINGS

Number of meetings held	2				
Type of meeting	Date of meeting	Total Number of Members entitled to attend meeting	Attendance		
		attend meeting	Number of members attended	% of total shareholding	
Extra-Ordinary General Mee	09/04/2021	9	9	100	
Annual General Meeting	27/11/2021	9	9	100	

B. BOARD MEETINGS

*Number of meetings held 23

		1		• · · ·	
S. No.	Date of meeting	Total Number of directors associated as on the date	Attendance		
		of meeting	Number of directors attended	% of attendance	
1	14/04/2021	2	2	100	
2	08/06/2021	2	2	100	
3	23/06/2021	2	2	100	
4	05/07/2021	2	2	100	
5	12/07/2021	2	2	100	

0

S. No.	Date of meeting	Total Number of directors associated as on the date	l as on the date		
		of meeting	Number of directors attended	% of attendance	
6	19/07/2021	2	2	100	
7	27/07/2021	2	2	100	
8	16/08/2021	2	2	100	
9	27/08/2021	2	2	100	
10	10/09/2021	2	2	100	
11	20/10/2021	2	2	100	
12	25/10/2021	2	2	100	

C. COMMITTEE MEETINGS

Nu	Imber of meeting	gs held		0	
	S. No.	Type of meeting	Date of meeting		Attendance % of attendance
	1				

D. *ATTENDANCE OF DIRECTORS

		Board Meetings			Committee Meetings			Whether attended AGM
S. No.	of the director		Meetings	% of attendance		Meetings	% of attendance	held on
		entitled to attend	attended		entitled to attend	attended	allendance	29/09/2022 (Y/N/NA)
1	RAJESH SHA	23	23	100	0	0	0	Yes
2	GARGI SARA	23	23	100	0	0	0	Yes

X. *REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Nil

Number of Managing Director, Whole-time Directors and/or Manager whose remuneration details to be entered

S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	RAJESH SHARMA	MANAGING DIF	4,800,000	0	0	0	4,800,000
2	GARGI SARASWA	WHOLE-TIME C	3,600,000	0	0	0	3,600,000
	Total		8,400,000	0	0	0	8,400,000
Number c	of CEO, CFO and Comp	bany secretary who	se remuneration d	etails to be entered	1	1	
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1	ANKITA KARNANI	COMPANY SEC	264,000	0	0	0	264,000
	Total		264,000	0	0	0	264,000
Number c	0						
S. No.	Name	Designation	Gross Salary	Commission	Stock Option/ Sweat equity	Others	Total Amount
1							0
	Total						

XI. MATTERS RELATED TO CERTIFICATION OF COMPLIANCES AND DISCLOSURES

* A.	Whether the company has made compliances and disclosures in respect of applicable	Yes	\bigcirc	No
	provisions of the Companies Act, 2013 during the year	103	\bigcirc	110

B. If No, give reasons/observations

XII. PENALTY AND PUNISHMENT - DETAILS THEREOF

(A) DETAILS OF PENALTIES / PUNISHMENT IMPOSED ON COMPANY/DIRECTORS /OFFICERS igginal Nil

Name of the	Name of the court/ concerned Authority	Date of Order			Details of appeal (if any) including present status		
(B) DETAILS OF COMPOUNDING OF OFFENCES NII							

Name of the		section linder which	Amount of compounding (in Rupees)

XIII. Whether complete list of shareholders, debenture holders has been enclosed as an attachment

● Yes ○ No

XIV. COMPLIANCE OF SUB-SECTION (2) OF SECTION 92, IN CASE OF LISTED COMPANIES

In case of a listed company or a company having paid up share capital of Ten Crore rupees or more or turnover of Fifty Crore rupees or more, details of company secretary in whole time practice certifying the annual return in Form MGT-8.

Name	ABHIMANYU RAJPUROHIT
Whether associate or fellow	○ Associate ● Fellow
Certificate of practice number	8757

I/We certify that:

(a) The return states the facts, as they stood on the date of the closure of the financial year aforesaid correctly and adequately.
(b) Unless otherwise expressly stated to the contrary elsewhere in this Return, the Company has complied with all the provisions of the Act during the financial year.

(c) The company has not, since the date of the closure of the last financial year with reference to which the last return was submitted or in the case of a first return since the date of the incorporation of the company, issued any invitation to the public to subscribe for any securities of the company.

(d) Where the annual return discloses the fact that the number of members, (except in case of a one person company), of the company exceeds two hundred, the excess consists wholly of persons who under second proviso to clause (ii) of sub-section (68) of section 2 of the Act are not to be included in reckoning the number of two hundred.

Declaration

I am Authorised by the Board of Directors of the company vide resolution no. ..

dated 03/09/2022

(DD/MM/YYYY) to sign this form and declare that all the requirements of the Companies Act, 2013 and the rules made thereunder in respect of the subject matter of this form and matters incidental thereto have been compiled with. I further declare that:

1. Whatever is stated in this form and in the attachments thereto is true, correct and complete and no information material to the subject matter of this form has been suppressed or concealed and is as per the original records maintained by the company.

06

2. All the required attachments have been completely and legibly attached to this form.

Note: Attention is also drawn to the provisions of Section 447, section 448 and 449 of the Companies Act, 2013 which provide for punishment for fraud, punishment for false statement and punishment for false evidence respectively.

To be digitally signed by

Director

RAJESH Digitally signed by RAJESH SHARMA SHARMA Date: 2022.12.05 20:07:47 +05'30'

00566446

DIN of the director

To be digitally signed by

ANKITA	Digitally signed by ANKITA KARNANI
KARNANI	Date: 2022.12.05 20:08:29 +05'30'

⊖ Company secretary ∕lembership number	in practice 54952	Certificate of	practice number	
Attachments				List of attachments
1. List of shar	e holders, debenture holder	rs	Attach	LTC LOS 2022.pdf
2. Approval le	etter for extension of AGM;		Attach	LTC BM 2022.pdf LTC MGT 8 2022.pdf
3. Copy of M	GT-8;		Attach	
4. Optional A	ttachement(s), if any		Attach	
				Remove attachment
	Modify	heck Form	Prescrutiny	Submit

This eForm has been taken on file maintained by the Registrar of Companies through electronic mode and on the basis of statement of correctness given by the company

LTC COMMERCIAL COMPANY PRIVATE LIMITED

Regd. Office:-Khasara No. 180, 1st floor, Bijapur village budhpur, behind garud motors, Delhi north west- 110036 IN

Corporate Office:-156, Navalgarh House, Sansar Chandra Road, Jaipur-302001, Rajasthan IN Ph. No.:-0141-2372357 Mob.:-8003593401,402 e-mail:-<u>ltc.india@ltcagro.com</u>, Web:-www.ltcagro.com

CIN:-U51109DL1992PTC290630

S.NO.	NAME			FOLIO NUMBER	NO.OF SHARES HELD	CLASS OF SHARES	AMOUNT OF SHARES (IN RS.)
	FIRST	MIDDLE	LAST				
1	RAJESH		SHARMA	34	3446000	EQUITY	34460000
2	GARGI		SARASWAT	35	2799600	EQUITY	27996000
3	RAJESH SHARMA HUF			91	216000	EQUITY	2160000
4	TARA	CHAND	SHARMA	38	870000	EQUITY	8700000
5	NARBADA	DEVI	SHARMA	36	748000	EQUITY	7480000
6	TARA CHAND SHARMA HUF			92	416000	EQUITY	4160000
7	SHIV	KUMAR	SHARMA	37	836000	EQUITY	8360000
8	TARA		SHARMA	69	314000	EQUITY	3140000
9	SHIV KUMAR SHARMA HUF			67	354400	EQUITY	3544000
	TOTAL				10000000		100000000

LIST OF SHAREHOLDERS AS ON MARCH 31, 2022

For and on behalf of the Board of Directors LTC COMMERCIAL COMPANY PRIVATE LIMITED

Date:-03.09.2022 Place:-Bikaner

4.00

LTC Commercial Co. Pvt. Ltd.

21 21 21 5

Managing Director Rajesh Sharma Managing Director DIN: -00566446 Add:-Flat no. 103, D-233, Kalpvriksh appartment, Bihari Marg, Jaipur, Rajasthan-302016 IN

For LTC COMMERCIAL CO. PVT. LTD. Company Secretary

Ankita Karnani Company Secretary M. No.:-A54952 Add:-Karnani Gali, Mohta ka chowk Bikaner, Rajasthan-334001 IN

LTC COMMERCIAL COMPANY PRIVATE LIMITED

Regd. Office:-Khasara No. 180, 1st floor, Bijapur village budhpur, behind garud motors, Delhi north west-

110036 IN

Corporate Office:-156, Navalgarh House, Sansar Chandra Road, Jaipur-302001, Rajasthan IN Ph. No.:-0141-2372357 Mob.:-8003593401,402 e-mail:-<u>htc.india@ltcagro.com</u>, Web:-www.ltcagro.com CIN:-U51109DL1992PTC290630

POINT IX (B) OF MGT-7:-

LIST OF NUMBER AND DATES OF BOARD MEETINGS HELD DURING THE FINANCIAL YEAR 2021-22 Number of Board Meetings:-23

S. NO.	DATES OF MEETINGS	TOTAL NUMBER OF DIRECTORS	ATTENDANCE		
		ASSOCIATED AS ON THE DATE OF MEETING	NUMBER OF DIRECTORS ATTENDED THE MEETING	% OF ATTENDANCE	
1.	April 14, 2021	2	2	100	
2.	June 08, 2021	2	2	100	
3.	June 23, 2021	2	2	100	
4.	July 05, 2021	. 2	2	100	
5.	July 12, 2021	2	2	100	
6.	July 19, 2021	2	- 2	100	
7.	July 27, 2021	2	2 .	100	
8.	August 16, 2021	. 2	2	100	
9.	August 27, 2021	2	2	100	
10.	September 10, 2021	2	2	100	
11.	October 20, 2021	2	2	100	
12.	October 25, 2021	2	2	. 100	
13.	November 03, 2021	2	* ₅₂ 2	100	
14,	November 11, 2021	2	1 Na 2	100	
15	November 15, 2021	2	* 2	100	
16.	December 02, 2021	2	- 2	100	
17.	December 15, 2021	2	2	100	
18,	January 08, 2022	2	2	. 100	
19.	January 17, 2022	2	2	100	
20.	January 27, 2022	2	2	100	
21.	February 14, 2022	2	2	100	

For LTC COMMERCIAL CO. PVT. LTD. Ankita Karmani

LTC Commercial Co. Pvt. Ltd.

1 3 **Managing Director**

LTC COMMERCIAL COMPANY PRIVATE LIMITED

Regd. Office:-Khasara No. 180, 1st floor, Bijapur village budhpur, behind garud motors, Delhi north west-

110036 IN

Corporate Office:-156, Navalgarh House, Sansar Chandra Road, Jaipur-302001, Rajasthan IN Ph. No.:-0141-2372357 Mob.:-8003593401,402 e-mail:-ltc.india@ltcagro.com, Web:-www.ltcagro.com

CIN:-U51109DL1992PTC290630

22.	March 14, 2022	2	2	100
23.	March 24, 2022	2	2	100

For and on behalf of the Board of Directors LTC COMMERCIAL COMPANY PRIVATE LIMITED

Date:- 03.09.2022 Place:-Bikaner

LTC Commercial Co. Pvt. Ltd.

210313121

Managing Director Managing Director DIN: -00566446 Add:-Flat no. 103, D-233, Kalpvriksh appartment, Bihari Marg, Jaipur, J Rajasthan-302016 IN For LTC COMMERCIAL CO. PVT. LTD.

\$ 18 19

M Speciatary

Ankita Karnani Company Secretary M. No.:-A54952 Add:-Karnani Gali, Mohta ka chowk Bikaner, Rajasthan-334001 IN

Form No. MGT-8

[Pursuant to Section 92(2) of the Companies Act, 2013 and rule 11(2) of Companies (Management and Administration) Rules, 2014]

CERTIFICATE BY A COMPANY SECRETARY IN PRACTICE

I have examined the registers, records and books and papers of M/s. LTC COMMERCIAL COMPANY PRIVATE LIMITED (CIN:-U51109DL1992PTC290630) (The Company) as required to be maintained under the Companies Act, 2013 (the Act) and the rules made there under for the financial year ended on 31st March, 2022. In my opinion and to the best of my information and according to the examinations carried out by me and explanations furnished to me by the company, its officers and agents, I certify that:-

- A. The Annual Return states the facts as at the close of the aforesaid financial year correctly and adequately.
- B. During the aforesaid financial year 2021-22, the Company has complied with provisions of the Act & Rules made there under, in respect of the following:-
- In respect of its Status under the act -The Company is a Private Limited company registered under Companies act, 1956 (bearing CIN:-U51109DL1992PTC290630, having Authorized and Paid-up Share Capital of Rs. 10 crores) and is active.
- The Company has maintained registers/records & made entries therein within the time prescribed therefore.
- 3. The Company has filed forms and returns as stated in the annual return, with the Registrar of Companies, Regional Director, Central Government, the Tribunal, Court or other authorities, as applicable, within/beyond the prescribed time with/without additional fee, as the case may be.
- 4. The Company has called/ convened/ held meetings of Board of Directors or its committees and the meetings of the members of the company on due dates as stated in the annual return in respect of which meetings, proper notices were given and the proceedings have been properly recorded in the Minute Book/registers maintained for the purpose and the same have been signed; No circular resolutions and resolutions by postal ballot were passed.
- 5. The Company has not closed its register of members.
- 6. The Company has not given any loans as per section 185 of the act, to its directors and/or persons or firms or companies referred in section 185 of the Act; however, as per the information provided to us, advances to persons referred in section 185 of the Act have been made in the ordinary course of business.

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- 7. As per the information provided to us, the Company has complied with the provisions of the act relating to contracts/arrangements with related parties as specified in section 188 of the Act, as applicable. Transactions with related parties have been detailed, in annexure "A" which were in the ordinary course of business and on arm's length basis.
- The Company has not made any issue or allotment or buy back of securities/alteration or reduction
 of share capital/conversion of shares/ securities and issue of security certificates during the year
 under review. No transfer or transmission of shares/securities has taken place during the year under
 review.
- There were no transactions necessitating the Company to keep in abeyance the rights to dividend, rights shares and bonus shares pending registration of transfer of shares.
- 10. As per the information provided to us, the Company has not declared/paid any dividend including interim dividend during the year under review, and there was no amount of unpaid/unclaimed dividend and there was no need to transfer any amounts to the investor education and protection fund in accordance with section 125 of the Act.
- The Company has complied with the provisions of section 134 of the act for signing of audited financial statement and report of directors is as per sub-sections (3), (4) and (5) thereof;
- 12. The Company has complied with the provisions of the act relating to constitution/ appointment/ reappointments/ retirement/ filling up casual vacancies/ disclosures of the Directors, Key Managerial Personnel and the remuneration paid to them, to the extent applicable on the Company. No appointments was made by the Company on its Board of Directors during the year under review.
- 13. The Company has complied with the provisions of section 139 of the Act relating to appointment/ reappointment/ filling up of casual vacancies of auditors, as applicable.
- 14. The Company has obtained approvals required to be taken from the Central Government, Tribunal, Regional Director, Registrar, Court or such other authorities under the various provisions of the Act during the year under review.
- 15. As per the Information provided to us, the Company has not invited/accepted any deposits & there were no deposits to be repaid/renewed, during the year under review.
- 16. The Company has complied with the provisions of the act in relation to the borrowings from financial institutions, banks and others and creation/ modification/ satisfaction of charges in that respect, wherever applicable. The company has not made any borrowings from its directors & members during the year under review.



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- 17. The Company has not made loans or given guarantees or provided securities to other bodies corporate or persons falling under the provisions of section 186 of the Act during the year under review.
- 18. The Company has complied with provisions of the act in respect of alteration in its Memorandum of Association during the year under review. Alteration in the Main Object clause of the Memorandum of association of the company was made with approval of the members of the Company in the extra-ordinary general meeting held on April 09, 2021. The Company has not altered Article of Association of the Company during the year under review.

Date:-September 03, 2022 Place:-Delhi UDIN:-F008051D000902857

For A. RAJPUROHIT & CO. Company Secretaries



FCS ABHIMANSU RAJPUROHIT (Proprietor) Membership No:-8051 C.P. No.:-8757

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A RAJPUROHIT & CO. Company Secretaries

ANNEXURE-A

LIST OF RELATED PARTY TRANSACTIONS FOR THE FINANCIAL YEAR 2021-22

AMOUNT NATURE OF TRANSACTIONS NAME OF THE RELATED S. (IN RS.) N PARTY 0. 96,868.00 Storage Charges (Services Provided) Bhawani Trading Company 1. 54,74,757.00 Bhawani Trading Company Sales made 2. 36,683.00 Storage Charges (Services Provided) Bhagwati Trading Company 3. Advances Given for Purchase of Goods 33,10,000.00 Bhagwati Trading Company 4. 15,00,000.00 Storage Charges (Services Received) Tara Sharma 5. 15,00,000.00 Storage Charges (Services Received) Shiv Kumar Sharma 6. 15,00,000.00 Storage Charges (Services Received) Narbada Devi Sharma 7. 15,00,000.00 Storage charges (Services Received) Rajesh Sharma 8. 1,68,000.00 Office Rent (Services Received) Rajesh Sharma 9. Storage charges (Services Received) 15.00.000.00 Tara Chand Sharma 10. 1.68.000.00 Office Rent (Services Received) Tara Chand Sharma 11. 1,38,638.00 Advances Given for Services Tara Chand Sharma 12. 8,73,567.00 Storage Charges (Services Provided) Saraswati oil mill 13. 2,24,47,086.0 Sale of Goods Saraswat Agrocom Private Limited 14. 0 25,058.00 Storage Charges (Services Provided) Saraswat Agrocom Private Limited 15. 24,64,800.00 Storage Charges (Services Received) 16. Saraswat Agrocom Private Limited 60,000.00 License Charges Paid (Software running E-Tech Innovative Services Private 17. charges) Limited 99,89,827.00 Purchase of Goods Kohinoor Commotrade Private 18. Limited 31,454.00 Kohinoor commotrade Private Storage charges (Services provided) 19. limited 9,032.00 20. Anjali Commodity Storage charges (Services provided)

Date:-September 03, 2022 Place:-Delhi UDIN:-F008051D000902857 For A. RAJPUROHIT & CO. Company Secretaries

> FCS ABHIMANYU RAJPUROHIT (Proprietor) Membership No:-8051 C.P. No::-8757

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