

# SITA

ENTERPRISES LTD.

---

Report  
and  
Accounts  
2022

---

# **SITA ENTERPRISES LIMITED**

## **BOARD OF DIRECTORS**

Mr. Ashok Tulsyan, Whole Time Director

Mr. Mukesh Sarswat, Independent Director

Mr. Sandeep S. Rathi, Independent Director

Smt. Sanju Tulsyan

Smt. Sneha Tulsyan

## **COMPANY SECRETARY**

Mrs. Shweta Mehta

## **CHIEF FINANCIAL OFFICER**

Mr. V K Vora

## **BANKERS**

Canara Bank

Barclays Bank

## **AUDITORS**

M/s. Patel Shah & Joshi

Chartered Accountants

## **REGISTERED OFFICE**

415-416, Arun Chambers,

Tardeo Road,

MUMBAI - 400 034.

CIN: L45202MH1982PLC026737

PHONE: 022 - 6662 7383 / 84

EMAIL: [sitaenterprisesltd@yahoo.com](mailto:sitaenterprisesltd@yahoo.com)

WEBSITE: [www.sitaenterprises.com](http://www.sitaenterprises.com)

# SITA ENTERPRISES LIMITED

## NOTICE

Notice is hereby given that the Thirty-Ninth Annual General Meeting of the members of Sita Enterprises Ltd. will be held on Thursday the 29<sup>th</sup> September, 2022 at 3.00 PM through Video Conferencing (“VC”)/ Other Audio-Visual Means (“OAVM”) to transact the following business:

### Ordinary Business:

1. To receive, consider and adopt the Audited Financial Statements of the company for the year ended 31-03-2022 together with the Reports of the Directors and Auditors thereon.
2. To appoint a director in place of Mr. Ashok Tulsyan (Director Identification Number: 00353156) who retires from office by rotation and being eligible offers herself for re-appointment.

Mumbai  
12<sup>th</sup> August, 2022

By Order of the Board

Shweta Mehta  
Company Secretary

### NOTES:

1. This Annual General Meeting (AGM) of the members of the Company is being held through Video Conferencing (VC)/Other Audio-Visual Means (OAVM) in compliance with the MCA and SEBI Circulars. The facility for the appointment of proxies by the Members will not be available for the AGM and hence the Proxy Form and Attendance Slip are not annexed to the Notice.
2. Corporate Members are requested to send a scanned copy (in PDF / JPG format) of the Board Resolution authorizing their representatives to attend the AGM, pursuant to Section 113 of the Act, through e-mail at [sitaenterprisesltd@yahoo.com](mailto:sitaenterprisesltd@yahoo.com) with a copy marked to [evoting@nsdl.co.in](mailto:evoting@nsdl.co.in)
3. The Registers of Members and Transfer Books of the Company in respect of the Equity Shares of the Company will remain closed from 23<sup>rd</sup> September, 2022 to 29<sup>th</sup> September, 2022, both days inclusive.
4. The facility for making/varying/cancelling nominations is available to shareholders. Nominations/ variations/ cancellations can be made by giving notice in Form SH-13 and SH-14 which can be obtained from the Share Department of the Company or Share Transfer Agent or from the MCA website- [www.mca.gov.in](http://www.mca.gov.in).
5. Members are requested to contact Link Intime India Pvt. Ltd. (LIPL), Share Transfer Agent of the Company, for consolidation of folios, transfer of physical shares into Demat form and other queries relating to their shares.
6. Members are requested to intimate changes, if any, pertaining to their name, postal address, e-mail address, telephone/ mobile number, Permanent Account Number (PAN), mandates, nominations, power of attorney, bank details and other changes, to their DPs in case of holdings in electronic form and to the LIPL in case of holdings in physical form.
7. In compliance with applicable provisions, notice of the AGM along with Annual Report 2021-22 is being sent through electronic mode, to those members whose email addresses are registered with the Company/ Depositories. These will also be available on the Company's website ([www.sitaenterprises.com](http://www.sitaenterprises.com)), BSE's website ([www.bseindia.com](http://www.bseindia.com)) and NSDL website ([www.evoting.nsdl.com](http://www.evoting.nsdl.com)). Members who have not registered their e-mail addresses are requested to register the same with their Depository Participants (“DP”) in case the shares are held by them in electronic form and with LIPL in case of physical form shares.
8. Members attending the AGM through VC / OAVM shall be counted for the purpose of reckoning the quorum under Section 103 of the Act.
9. Members desirous of registering themselves as speaker shareholder or obtaining information on accounts and operations of the Company, are requested to address their queries at [sitaenterprisesltd@yahoo.com](mailto:sitaenterprisesltd@yahoo.com) from 26<sup>th</sup> September, 2022 to 28<sup>th</sup> September, 2022 till 5.00 p.m. mentioning their name, Demat account number/folio number, email id, mobile number, so that the same could be suitably answered at the meeting/by email.
10. Those shareholders who have registered themselves as a speaker will only be allowed to express their views/ask questions during

the meeting. The Company reserves the right to restrict the number of questions and number of speakers, as appropriate for smooth conduct of the AGM, depending on availability of time.

11. The deemed venue for the Annual General Meeting shall be the registered office of the company. Due to pandemic, the AGM shall only be via VC/ OAVM, without any physical presence of shareholders at the said Registered Office.
12. In terms of section 108 of the Act read with applicable provisions, the Resolutions for consideration at this AGM will be transacted through remote e-voting (facility to cast vote prior to the AGM) and also e-voting during the AGM. The Board of Directors of the Company (‘the Board’) have engaged the services of NSDL for E-voting and for conducting the AGM.
13. Ms. Swati Mittal (Membership No.22644), Practicing Company Secretary, has been appointed as the Scrutinizer to scrutinize the e-voting process in a fair and transparent manner.
14. The voting results along with the Scrutinizer's report shall be placed on the Company's website [www.sitaenterprises.com](http://www.sitaenterprises.com) and on the website of NSDL [www.evotingnsdl.com](http://www.evotingnsdl.com) and the same shall be communicated to the BSE Limited, where the shares of the Company are listed.
15. The instructions for members for remote e-Voting prior to AGM, e-voting at AGM and for joining Annual General Meeting are annexed.

### Detail of Directors Seeking Appointment / Re-appointment at the AGM:

Name	Ashok Tulsyan
DIN	00353156
Date of Birth	21/03/1957
Date of Appointment	16/01/1989
Expertise	NBFC Business
Qualification	B.Com (Hons.), Chartered Accountant
No. of Shares held	130500
No. of Board meetings Attended	6
Category	Director (Spouse of Mrs. Sanju Tulsyan, father of Sneha Tulsyan - Promoter Directors in the Company)
Other Public Companies in which Directorship held	Goyal Housing and Finance Ltd.
Member of the Committees of other Companies	Nil
Remuneration Drawn	Nil

By order of the Board

Mumbai  
12<sup>th</sup> August, 2022

Shweta Mehta  
Company Secretary

## SITA ENTERPRISES LIMITED

### DIRECTORS' REPORT

#### To The Members:

Your Directors have pleasure in submitting the Thirty-Ninth Annual Report of the Company together with the audited Annual Accounts showing the financial position of the Company for the year ended on 31<sup>st</sup> March 2022.

#### Management Discussion & Analysis

i) Industry structure and development: The company is a Non-Systemically Important Non-Deposit taking Non-Banking Finance Company (NBFC) registered with Reserve Bank of India Act, 1934. The company is engaged in investments and finance.

ii) Opportunities & Threats: The Company keeps a close watch on the trends in industry for making investments and giving loans in accordance with its size of operations considering the possible threats including external ongoing factors.

iii) Segment-wise or product-wise performance: The Company operates only in the segment of finance and investment and as such there is no reportable segments wise or product wise performance.

iv) Outlook: With the economy gradually coming out of Covid-19 pandemic crisis and with revival of markets, the management is hopeful to achieve reasonable performance in the current financial year: 2022-2023.

v) Risks and concerns: The Company has exposure in shares, securities, properties, loans & advances and any adverse development in stock market and industry will have an impact on the Company's performance.

vi) Internal control systems and their adequacy: The Company has adequate internal control systems commensurate for its limited operations. The Company has appointed Internal Auditors to observe the Internal Controls, and to assess that the workflow of the organization is being done through the approved policies of the Company. The observations of internal auditors are considered by the Audit Committee of the Board.

vii) Financial & Operational performance

The Financial and Operational performance during the year was as under:

	Rupees in Lakhs
Gross Income	102.75
Gross Operating Profit	65.06
Provision for Taxation	5.17
Profit After Tax	59.89

#### Covid -19 Pandemic

The impact of Covid-19 pandemic is gradually waning. However, the company continues to monitor all material changes to future conditions arising due to possible revival of pandemic. Management is of the view that at present there are no reasons to believe that the re-occurrence of pandemic will have any substantial impact on the performance of the company. Nevertheless, the impact in sight of the evolution of pandemic in the future period is uncertain and could impact the future performance.

#### Dividend and Transfer to Reserves

Your Directors do not recommend any dividend for the year ended on 31<sup>st</sup> March 2022. An amount of Rs. One Lac has been transferred from surplus balance in Statement of Profit and Loss

to general reserve during the year. An amount of Rs. Twelve Lakhs has been classified as special reserve as per RBI guidelines.

#### Directors and Key Managerial Personnel

Mr. Ashok Tulsyan retires from the Board by rotation and being eligible, offers himself for re-appointment as director at the ensuing Annual General Meeting of the Company.

During the year six board meetings were convened and held.

The Independent Directors of the company have given declarations under Section 149(7) of the act that they meet the criteria of independence as provided under Section 149(6) of the Act.

Apart from sitting fees paid to the independent directors no other remuneration is paid to directors. Commensurate with the very limited size of operations of the company the Board has, on recommendation of Nomination and Remuneration Committee -

i) Framed a policy for selection and appointment of Directors and Senior Management and their remuneration. As per company's policy the independent director should possess fair professional qualification, sound ethics and attributes, and should meet the criteria of independence.

ii) Adopted a framework for performance evaluation of the Board, its Committees, individual directors and chairperson through a survey questionnaire. The survey questionnaire broadly covers various aspects of board functioning, composition of the Board and its committees, culture, execution and performance of specific duties, obligation and governance.

#### NBFC Activities

The Company is classified as an Investment and Credit Company (NBFC-ICC) as per RBI guidelines. The Company is not accepting/holding public deposits and as such no amount on account of principal or interest on public deposit was outstanding on the date of balance sheet.

#### Particulars of Loans, Guarantees or Investment

The Company being an NBFC registered with Reserve Bank of India, the provisions of section 186 of The Companies Act, 2013 are not applicable to it.

#### Audit Committee

The Company has constituted an audit committee with Mr. S Rathi, Mr. Mukesh Sarswat and Mr. A. Tulsyan as members. All recommendations of the audit committee have been accepted by the board.

#### Directors' Responsibility Statement

To the best of their knowledge and belief, and according to the information and explanations obtained, your Directors make the following statements in terms of Section 134(3)(C) of the act:

- That in the preparation of the annual accounts, the applicable accounting standards have been followed along with proper explanations relating to material departures.
- That the directors have selected such accounting policies and applied them consistently and made judgments and estimates that are 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 that period.
- That the directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities.

- d. That the directors have prepared the annual accounts on a going concern basis.
- e. That the directors have laid down internal financial controls to be followed by the company and that such internal financial controls were adequate and operating effectively.
- f. That the directors have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems are adequate and operating effectively.

#### **Related Party Transactions**

Related party transactions were on arm's length basis and were in the ordinary course of the business. Details of the transactions with Related Parties are provided in the accompanying financial statements. There was no transaction during the year which would require to be reported in Form AOC.2.

#### **Statutory Auditors**

M/s. Patel Shah & Joshi, Chartered Accountants, are the statutory auditors of the company. There are no qualifications, reservations or adverse remarks or disclaimers made by Statutory Auditors in their Report on the financial statements for the period.

#### **Secretarial Auditors**

Swati Mittal, the secretarial auditors, has given a Secretarial Audit Report in form MR3 for the period. There are no qualifications, reservations or adverse remarks or disclaimers made by her in the Report.

#### **Risk Management Policy**

Commensurate with its very limited size of operations the Company is keeping a close watch on the trends in industry for lending of funds and making investments. It is also considering the possible threats due to external factors.

#### **Corporate Social Responsibility**

It is your company's belief that its primary goal is to fulfill responsibility towards all its constituents i.e., shareholders, customers, government, regulatory bodies, etc. The company maintains fair and ethical practices in its dealings as part of its social responsibility. Further provisions of section 135 of the act and submission of corporate governance report are not applicable to the company.

#### **Vigil Mechanism/Whistle Blower Policy**

Your Company has adopted and disseminated its Whistle-Blower Policy to provide a secure environment and encourage employees to report unethical, unlawful, or improper practices, acts or activities and to prohibit any adverse action against those who report such practices in good faith. The Whistle-Blower Policy is disclosed on the website of the Company.

#### **Annual Return**

In accordance with Section 134(3)(a) of the act, an extract of the Annual Return in form MGT-9 is annexed. A copy of annual return shall also be placed on the website of the company– [www.sitaenterprises.com](http://www.sitaenterprises.com).

#### **Subsidiaries, Associates and Joint Ventures**

The company does not have any subsidiary or joint venture. The company has an associate company namely - Bombay Mercantile & Leasing Company Ltd. The accounts of this associate concern have not been consolidated with that of the company as there is no requirement for the same as per provisions of Accounting Standard - Ind (AS) 28. For the reasons mentioned in the prescribed form AOC- I, annexed separately.

#### **Other Information**

The disclosure under Section 197 of the Companies Act, 2013 has been annexed to this report. The company has no employee of the category specified in Section 197(12) of the Act.

The Company has not consumed any significant quantity of energy; therefore, no comments are made on conservation of energy and technology absorption. There has been no foreign exchange income/outflow during the year under review. The provision of cost audit is not applicable to the Company.

The shares of the company are listed at BSE Limited (Bombay Stock Exchange). The company has paid the due listing fees to the exchange.

There have been no other material changes and commitments, if any, affecting the financial position of the company, which have occurred between the end of the financial year and date of the report. During the year - there has been no change in nature of business conducted by the company, there has been no change in share capital, no share has been transferred in suspense account, no fraud has been reported to the audit committee, no order or penalty was passed against the company by any authority.

The Company has the Audit Committee, Nomination and Remuneration Committee, Stakeholders Relationship Committee. The Company has in place internal financial control systems, commensurate with the size and complexity of its operations, to ensure proper recording of financial and monitoring of operational effectiveness and compliance of various regulatory and statutory requirements.

The company is following the guidelines of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013. There have been no cases reported during the year.

The Company is giving effect to various compliances applicable to it and adopting policies commensurate with its limited size of operations.

The board places on record its appreciation for the continued support and cooperation extended by employees, customers, bankers, and all other constituents.

On behalf of the Board

Mumbai, 30th May, 2022

**A. Tulsyan**  
Director

**S. Tulsyan**  
Director

**Annexure to the Directors' Report****SITA ENTERPRISES LIMITED****Information under Section 197 of the Companies Act, 2013 read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.**

(i) The Ratio of the remuneration of each Director to the median remuneration of the employees of the Company for the financial year 2021-2022 [Not Applicable – Please see note Below.]

(ii) The percentage increase in remuneration of each Director, Managing Director & Chief Executive Officer, Chief Financial Officer and Company Secretary of the Company in the financial year 2021-22. Mr. V.K. Vora- Chief Financial Officer (increase) 8.80%, Company Secretary (increase) 4.16%.

(iii) The percentage increase / decrease in the median remuneration of employees in the financial year 2021-22 (Increase) 4.17%

(iv) The number of permanent employees on the rolls of Company- Three

(v) The explanation on the relationship between average increase / decrease in remuneration and Company performance (Profit before tax increases by 94.77%). The overall increase in remuneration was 48.39%.

(vi) Comparison of the remuneration of the Key Managerial Personnel against the performance of the Company. [Not Applicable – Please see note Below.]

(vii) Variations in the market capitalization of the Company, price earnings ratio as at the closing date of the current financial year and previous financial year and percentage increase or decrease in the market quotations of the shares of the Company in comparison to the rate at which the Company came out with the last public offer.

Market Capital as on 31-03-2021 was Rs.335.10 Lakhs and as on 31-03-2022 was Rs.363.60 Lakhs. EPS as on 31-03-2021 was Rs.0.93 and as on 31-03-2022 was Rs.1.74. The last public offer for equity shares of the company was an offer for sale made in 1994-95 for 7.5 Lakhs equity shares of Rs. 10/- each at par. The market quotation (BSE Closing price of a single equity share of company as on 31-03-2022 was Rs. 12.12 representing a 8.50% increase from the closing price as on 31-03-2021.

(viii) Average percentiles increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration. [Not Applicable – Please see note below.]

(ix) The comparison of each remuneration of Key Managerial Personnel against the performance of the Company during the Financial Year 2021-2022 is as: [The amount paid to key managerial personnel during the year was 5.27% of total gross revenue and 10.40% of profit after tax.]

(x) The key parameters for any variable component of remuneration availed by the Directors. [Not Applicable – Please see note Below.]

(xi) The ratio of the remuneration of the highest paid Director to that of the employees who are not Directors but receive remuneration in excess of the highest paid Director during the year. [Not Applicable – Please see note Below.]

(xii) Affirmation that the remuneration is as per the Remuneration Policy of the Company.

Pursuant to Rule 5(1)(xii) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, it is affirmed that the remuneration paid to the Directors, KMPs, Senior Management and other employees of the Company is as per the Remuneration Policy of the Company. [Not Applicable – Please see note Below.]

**NOTES**

Apart from sitting fees of Rs.60,000/- paid to independent directors no remuneration was paid to directors. Payments to Key Managerial Personnel (KMP) – Rs.1,87,500/- to Company Secretary and Rs. 3,54,250/- to CFO. The company maintains the minimum number of employees for day-to-day affairs and this remuneration is in line with the basic needs. Clause no. i, vi, viii, x, xi, xii are not applicable / relevant / material. There are no employees in the company covered by provisions of section 197(12) of the Companies Act, 2013 read with rule 5 (2) 7 5 (3) of the companies (Appointment and remuneration of managerial personnel) Rules, 2014 for which particulars are required to be furnished.

**AOC - I**

Statement pursuant to Section 129(3) of the Companies Act, 2013 related to subsidiaries or Associates Companies or Joint Ventures.

Part – A – Subsidiaries – Not Applicable (No Subsidiary)

Part – B – Associates

Name of Associates	Bombay Mercantile & Leasing Company Ltd.
1. Latest audited Balance Sheet Date	31/03/2021
2. Date on which the Associate was associated	01/04/2002
3. Shares of Associate Company held by the company on the year end	
Number of Shares	12,05,000
Amount of Investment in Associates (Rs. in Lakhs)	180.75
Extent of Holding (in percentage)	48.98
4. Description of how there is significant influence	No significant influence as per Ind AS 28
5. Reason why the associate is not consolidated	* As per note below
6. Net worth attributable to shareholding as per latest audited Balance Sheet (Rs. in Lakhs)	380.66
7. Profit or Loss for the year (Rs. in Lakhs)	66.32
i. Considered in Consolidation (Rs. in Lakhs)	-
ii. Not Considered in Consolidation (Rs. in Lakhs)	66.32

\* The company (SEL) does not have significant influence over Bombay Mercantile and Leasing Company Ltd. (BML) in terms of provisions of Accounting Standard - Ind AS 28 as **there is no-** (a) Representation on the board of directors or equivalent governing body of the investee; (b) participation in policy making processes, including participation in decisions about dividends or other distributions ; (c) material transactions between the entity and its investee; (d) interchange of managerial personnel; or (e) provision of essential technical information.

Joint Ventures – Nil

Name of Associates or joint ventures which are yet to commence operation – NA

Name of Associates or joint ventures which have been liquidated or sold during the year – NA

For and on behalf of the Board

**A Tulsyan**  
Director

**S. Tulsyan**  
Director

**Shweta Mehta**  
Company Secretary

**V K Vora**  
Chief Financial Officer

Mumbai, 30<sup>th</sup> May, 2022

**FORM NO. MGT 9**

**EXTRACT OF ANNUAL RETURN**

as on financial year ended on 31<sup>st</sup> March 2022

Pursuant to Section 92 (3) of the Companies Act, 2013 & rule 12(1) of the Company (Management & Administration) Rules, 2014.

<b>I</b>	<b>REGISTRATION &amp; OTHER DETAILS:</b>		
	i	CIN	L45202MH1982PLC026737
	ii	Registration Date	22 <sup>nd</sup> March, 1982
	iii	Name of the Company	SITA ENTERPRISES LIMITED
	iv	Category/Sub-category of the Company	Company having share capital
	v	Address of the Registered office & contact details	415-416, ARUN CHAMBERS, TARDEO ROAD, MUMBAI- 400 034
	vi	Whether listed company	YES at BSE Limited
vii	Name, Address & contact details of the Registrar & Transfer Agent, if any.		Link Intime India Pvt. Ltd C 101, 247 Park, L.B.S. Marg, Vikhroli (West), Mumbai – 400083. Tel:022 – 49186000

<b>II</b>	<b>PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY</b>		
	All the business activities contributing 10% or more of the total turnover of the company shall be stated		
	<b>Name &amp; Description of main products/services</b>	<b>NIC Code of the Product /service</b>	<b>% to total turnover of the company</b>
	Financial Services (NBFC activities)	99711	100

III	PARTICULARS OF HOLDING, SUBSIDIARY & ASSOCIATE COMPANIES / CONCERNS					
	Sr. no.	Name & Address of the Company	CIN/ GLN No.	Holding/ Subsidiary/ Associate	% of Shares Held	Applicable Section
	1	<b>Bombay Mercantile &amp; Leasing Company Limited</b> 415-416, Arun Chambers, Tardeo Road, Mumbai - 400034	U51900MH1984PTC032615	Associate	48.98	2(6)

IV	SHAREHOLDING PATTERN (Equity Share capital Breakup as % of total Equity)									
i)	Category-wise Share Holding									
	Category of Shareholders	No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% Change during the year
		Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A	Promoters									
(1)	Indian									
	a) Individual/HUF	823500		823500	27.45	823500		823500	27.45	-
	b) Central or State Govt.									
	c) Bodies Corporate	1025398		1025398	34.18	1025398		1025398	34.18	-
	d)Bodies Corporate - LLP	401102		401102	13.37	401102		401102	13.37	
	e) Bank/FI									
	f) Any other									
	SUB TOTAL: (A) (1)		2250000		2250000	75.00	2250000		2250000	75.00
(2)	Foreign	-	-	-	-	-	-	-	-	-
SUB TOTAL: (A) (2)										
Total Promoter Shareholding (A) = (A)(1) + (A)(2)		2250000		2250000	75.00	2250000		2250000	75.00	-

i)	Category-wise Share Holding (Continued)									
Category of Shareholders		No. of Shares held at the beginning of the year				No. of Shares held at the end of the year				% change during the year
		Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
B	Public Shareholding									
(1)	Institutions	-	-	-	-	-	-	-	-	-
SUB TOTAL: (B) (1)										
(2)	Non-Institutions									
	a) Bodies Corporate									
	i) Indian	12477	55500	67977	2.26	12502	55500	68002	2.27	-0.01-
	ii) Overseas									
	b) Individuals									
	i) Individual shareholders holding nominal share capital up to Rs.1 lakh	294123	158000	452123	15.07	310466	156800	467266	15.57	+0.50
	ii) Individuals shareholders holding nominal share capital in excess of Rs.1 lakh	119298	74700	193998	6.46	107714	74700	182414	6.08	-0.38
	c)NBFCs Registered with RBI	0	0	0	0	0	0	0	0	0
	d) Others (specify)									
	i) Hindu Undivided Family	35893	0	35893	1.20	31067	0	31067	1.03	-0.17
	ii) Non-Resident Indians	0	0	0	0	1200	0	1200	0.04	+0.04
	iii) Clearing member	9	0	9	0.01	51	0	51	0.01	+0.01
SUB TOTAL: (B) (2)		461800	288200	750000	25.00	463000	287000	750000	25.00	
	Total Public Shareholding (B) = (B)(1)+(B)(2)	461800	288200	750000	25.00	463000	287000	750000	25.00	
C	Shares held by custodian for GDRs & ADRs									
GRAND TOTAL: (A+B+C)		2711800	288200	3000000	100.00	2713000	287000	3000000	100	

ii)	Shareholding of Promoters								
	Sr. No	Shareholders' Name	Shareholding at the beginning of the year (01/04/2021)			Shareholding at the end of the year (31/03/2022)			
			No.of Shares	% of total shares of the company	% of shares pledged/ encumbered to total shares	No.of Shares	% of total shares of the company	% of shares pledged/ encumbered to total shares	% change in shareholding during the year
	1	Bombay Mercantile & Leasing Co. Ltd	1025398	34.1799	-	1025398	34.1799	-	-
	2	Ashok Tulsyan HUF	600000	20.0000	-	600000	20.0000	-	-
	3	Saas Commerce LLP. *	375000	12.5000	-	375000	12.5000	-	-
	4	Ashok Kumar Tulsyan	130500	4.3500	-	130500	4.3500	-	-
	5	Sanju Tulsyan	63900	2.1300	-	63900	2.1300	-	-
	6	Shanti Devi Tulsyan	27100	0.9033	-	27100	0.9033	-	-
	7	Sita Equity LLP *	15602	0.5201	-	15602	0.5201	-	-
	8	Tulsyan Products LLP *	10500	0.3500	-	10500	0.3500	-	-
	9	Anjua Tulsyan	1000	0.0333	-	1000	0.0333	-	-
	10	Sneha Tulsyan	1000	0.0333	-	1000	0.0333	-	-
TOTAL		2250000	75.00	-	2250000	75.00	-	-	
iii)	Change in Promoters' Shareholding								
	There are no changes in the promoter's shareholdings during the financial year 2021-22. *(change of name from Abhinandan Textiles and Traders LLP)								

iv)

Shareholding Pattern of top ten Shareholders (other than Directors, Promoters & Holders of GDRs & ADRs)								
Sr. No.	Shareholders' Name	Shareholding at 01/04/2020 / 31/03/2021 of the year		Date	Increase/ Decrease in shareholding	Reason	Cumulative Shareholding during the year (01/04/2020 to 31/03/21)	
		No. of Shares	% of total shares of the company				No. of Shares	% of total shares of the company
1	CHARM FISCAL COMPANY PVT.LTD.	52900	1.7633	1 Apr 2021	0			
		52900	1.7633	31 Mar 2022			52900	1.7633
2	MANMOHAN R. PRAHALADKA	18865	0.6288	1 Apr 2021	0			
				7 Jan 2022	-3365		15500	0.5167
				14 Jan 2022	-1000		14500	0.4833
		14500	0.4833	31 Mar 2022			14500	0.4833
3	AMIT HUKMICHAND HEDA	15000	0.5	1 Apr 2021	0			
				30 Sep 2021	-10		13456	0.4485
				08 Oct 2021	-190		13466	0.4422
				18 Mar 2022	-500		12766	0.4255
		12766	0.4255	31 Mar 2022			12766	0.4255
4	SUMAN DEVI BAGARIA	52350	1.745	1 Apr 2021	0			
		52350	1.745	31 Mar 2022			52350	1.745
5	MUKESH KUMAR BAGERIA	17390	0.5797	1 Apr 2021	0			
		17390	0.5797	31 Mar 2022			17390	0.5797
6	DEEPAK HARLALKA	25208	0.8403	1 Apr 2021	0			
		25208	0.8403	31 Mar 2022			25208	0.8403
7	SANGEETA PAWAN KHETAN	25300	0.8433	1 Apr 2021	0			
		25300	0.8433	31 Mar 2022			25300	0.8433
8	NILESH PAWAN KHETAN	25100	0.8367	1 Apr 2021	0			
		25100	0.8367	31 March 2022			25100	0.8367
9	SATYANARAYAN KHETAN	24300	0.8111	1 April 2021	0			
		24300	0.8111	31 March 2022			24300	0.8111
10	RAJ KUMAR LOHIA	11733	0.3911	1 Apr 2021	0			
		11733	0.3911	31 March 2022			11733	0.3911

\*T – Transfer

v)	Shareholding of Directors and Key Managerial Personnel (KMP)								
	Sr. No.	Shareholders' Name	Shareholding at the beginning (01/04/2021/ end (31/03/2022) of the year		Date	Increase/ Decrease in shareholding	Reason	Cumulative Shareholding during the year (01/04/21 to 31/03/22)	
			No. of Shares	% of total shares of the company				No. of Shares	% of total shares of the company
	A	Directors							
	1	ASHOK TULSYAN	130500	4.35	01 Apr 2021	-			
			130500	4.35	31 Mar 2022			130500	4.35
	2	SANJU TULSYAN	63900	2.13	01 Apr 2021	-			
			63900	2.13	31 Mar 2022			63900	2.13
	3	SNEHA TULSYAN	1000	0.03	01 Apr 2021				
			1000	0.03	31 Mar 2022			1000	0.03
	4	MUKESH SARSWAT	0	0	01 Apr 2021				
			0	0	31 Mar 2022			0	0
	4	SANDEEP RATHI	0	0	01 Apr 2021				
			0	0	31 Mar 2022			0	0
B	Key Managerial Personnel (KMP)- Nil Shareholding								

V	<b>INDEBTEDNESS</b>
The Company had no indebtedness with respect to secured or unsecured Loans or Deposits during the financial year 2021-22	
VI	<b>REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL</b>
Whole Time Director – NIL, Independent Directors – sitting fees paid to Mr. Sandeep Rathi - Rs.30,000/- and to Mr. Mukesh Sarswat- Rs.30,000/. Key managerial Personnel – Paid to Company Secretary - Mrs. Shweta Mehta Rs. 1,87,500 /-and to CFO - Mr. V K Vora - Rs. 3,54,250/-	
VII	<b>PENALTIES/PUNISHMENT/COMPOUNDING OF OFFENCES – NIL</b>