



September 06, 2021

To, The Deputy Gen. Manager, Dept.of Corporate Services, BSE Ltd, P.J.Tower, Dalal Street, Mumbai-400 001	To, The Deputy Gen. Manager, Metropolitan Stock Exchange of India Ltd. Vibgyor Towers, 4th Floor, Plot No. C-62, G- Block, Opp. Trident, Bandra-Kurla Complex, Bandra (E), Mumbai-400 098
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Sub: Furnishing of Annual Report under regulation 34(1) of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 for the year ended 31st March, 2021.

Dear Sir/Madam,

Please find enclosed herewith the Annual Report for the year ended on 31st March, 2021 as required under regulation 34(1) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Request you to take the same on record.

Thanking You.
Yours faithfully,

For Svarnim Trade Udyog Limited

Surbhi



Surbhi Aggarwal
Director
DIN: 08409763

SVARNIM TRADE UDYOG LIMITED

CIN: L65993WB1982PL0335067
Corp Office & Ware House: Ashok Vihar
Noor Mahal Rd Punjab Guest House Street
Nakodar – 144040. Dist Jalandhar Punjab.
Tel: + 91 91 52594408
Email: svarnimudyog@gmail.com
Web: www.svarnim.com

Reg Office: 3 A Mangoe Lane
1st Floor Surana House
Kolkata – 700 001 West Bengal.



SVARNIM TRADE UDYOG LIMITED

39th

ANNUAL REPORT

2020- 2021

Svarnim Trade Udyog Limited
CIN NO.: L65993WB1982PLC035067

REGISTERED OFFICE : 3-A, Mangoe Lane, 1st Floor, Surana House, Kolkata-700001
Email: svarnimudyog@gmail.com

CORPORATE OFFICE: Ashok Vihar Noor Mahal Rd, Punjab Guest House Street
Nakodar -144040 Dist Jalandhar Punjab.
Tel: + 91 91 52594408

BOARD OF DIRECTORS: Mr. Dhiraj Sosa - Executive, Non Independent Director
(Resigned w.e.f 05.05.2021)
Mrs. Jyotsna Sosa- Non Executive, Independent Director
(Resigned w.e.f 31.12.2020)
Ms.Surbhi Aggarwal- Executive Director
Mr. Bindess Kurrani- Non Executive, Independent Director
(Appointed 12-11-2020)
Ms. Bhavika D Vankar - Non Executive, Independent Director
(Appointed 12-01-2021)

COMPANY SECRETARY: Ms. Dipti Vertak (Resigned w.e.f 31.12.2020)
Ms. Rinky Gupta (Appointed w.e.f 31.12.2020)

STATUTORY AUDITORS : M/s. M/S. DGMS & Co.

SECRETARIAL AUDITOR: Ms. Kavita Joshi, Practicing Company Secretary

BANKERS : Allahabad Bank
E-1&E-2, Abhimanyu CHS Ltd., N.L. Complex,
Dahisar(East), Mumbai-400068

STOCK EXCHANGE: BSE Ltd., Metropolitan Stock Exchange of India Ltd

**REGISTRAR &
TRANSFER AGENTS :** MAS Services Ltd.
T-34, IInd Floor, Okhla Industrial Area,
Phase II, New Delhi-110020
Phone No.: 011 26387281
E-mail: info@masserv.com



SVARNIM TRADE UDYOG LIMITED
(CIN-L65993WB1982PLC035067)

Regd Office: 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India
39th ANNUAL REPORT 2020-2021

NOTICE

Notice is hereby given that the 39th Annual General Meeting of the Members of **M/s. SVARNIM TRADE UDYOG LIMITED**(CIN-L65993WB1982PLC035067) will be held on Thursday, the 30th day of September, 2021 at 4.00 p.m. at 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India to transact the following business:

ORDINARY BUSINESS:

1. The Audited Standalone Financial Statement of the Company for the Financial Year ended March 31, 2021 including the Audited Balance Sheet as at March 31, 2021, the Statement of Profit and Loss and Cash Flow Statement of the Company for the year ended on that date and notes related thereto together with the Board's Report and the Report of Auditors' thereon;

2. To appoint a Director in place of Ms. Surbhi Aggarwal(DIN:08409763)who retires by rotation and being eligible, offers herself for re - appointment.”

3. To consider and if thought fit, to pass with or without modification(s) the following resolution as a Ordinary Resolution:

“**RESOLVED THAT** pursuant to the provisions of section 139 and other applicable provisions, if any, of the Companies Act, 2013 and the Rules framed thereunder, as amended from time to time, read with the Companies (Audit and Auditor) Rules, 2014 and pursuant to the recommendation of the Audit Committee, M/S. DGMS & Co, Chartered Accountants (Firm Registration No. 0112187W), be and is hereby appointed as Statutory Auditors of the Company, in place of retiring auditors M/s. H.R. Nampurwala & Co, Chartered Accountants, whose term, as per the provisions of Section 139(2) of the Companies Act, 2013, as Statutory Auditor of the Company is expiring on the conclusion of this Annual General Meeting, to hold office from the conclusion of this Annual General Meeting (AGM) till the conclusion of the Forty Third AGM of the Company to be held in the year 2026, at such remuneration plus service tax, out-of-pocket, travelling and living expenses, etc., as may be mutually agreed between the Board of Directors of the Company and the Auditors.”

SPECIAL BUSINESS:

4. Regularization of Additional Director, Mr. Bindess Kurrani(DIN: 08915870) as Director of the company.

To consider and, if thought fit, to pass with or without modifications, the following resolution as Ordinary Resolution:

“**RESOLVED THAT** Mr. Bindess Kurrani(DIN:08915870), who was appointed by the Board of Directors as an Additional Director of the Company with effect from November 12, 2020 and who holds office up to the date of this Annual General Meeting of the Company in terms of Section 161(1) of the Companies Act, 2013, (‘the Act’) but who is eligible for appointment and in respect of whom the Company has received a notice in writing from the Member under Section 160(1) of the Act proposing her candidature for the office of Director of the Company, be and is hereby appointed a Director of the Company.”



“RESOLVED FURTHER THAT pursuant to the provisions of Section 149, 152, Schedule IV and other applicable provisions, if any, of the Act and the Companies (Appointment and Qualifications of Directors) Rules, 2014 as amended from time to time, appointment of Mr. Bindess Kurrani, who has submitted a declaration that she meets the criteria for independence as provided in Section 149(6) of the Act and Regulation 16 (b) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, as an Independent Director of the Company, not liable to retire by rotation, for a term of 5 years, with effect from November 12,2020 up to November 11, 2025, be and is hereby approved.”

5. Regularization of Additional Director, Mrs. Bhavika Dahyabhai Vankar (DIN: 09014060) as Director of the company.

To consider and, if thought fit, to pass with or without modifications, the following resolution as Ordinary Resolution:

“RESOLVED THAT Mrs. Bhavika Dahyabhai Vankar(DIN: 09014060), who was appointed by the Board of Directors as an Additional Director of the Company with effect from January 12, 2021 and who holds office up to the date of this Annual General Meeting of the Company in terms of Section 161(1) of the Companies Act, 2013, (‘the Act’) but who is eligible for appointment and in respect of whom the Company has received a notice in writing from the Member under Section 160(1) of the Act proposing her candidature for the office of Director of the Company, be and is hereby appointed a Director of the Company.”

““RESOLVED FURTHER THAT pursuant to the provisions of Section 149, 152, Schedule IV and other applicable provisions, if any, of the Act and the Companies (Appointment and Qualifications of Directors) Rules, 2014 as amended from time to time, appointment of Mrs. Bhavika Dahyabhai Vankar, who has submitted a declaration that she meets the criteria for independence as provided in Section 149(6) of the Act and Regulation 16 (b) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, as an Independent Director of the Company, not liable to retire by rotation, for a term of 5 years, with effect from January 12,2021 up to January 11, 2026, be and is hereby approved.”

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)
Sd/-**

**Surbhi Aggarwal
Chairman
(DIN:08409763)**

**Place: Kolkata
Date: September 02, 2021**

Notes:

- I. A member entitled to attend and vote is entitled to appoint a proxy to attend and vote instead of himself/herself and the proxy need not be a member. The proxies should, however, be deposited at the registered office of the Company not later than 48 hours before the commencement of the meeting.
- II. A person can act as a proxy on behalf of members not exceeding fifty in number and holding in the aggregate not more than ten percent of the total share capital of the company carrying voting rights. A member holding more than ten percent of total share capital of the company carrying voting rights may appoint a single person as a proxy and such person shall not act as proxy for any other Member.



- III. Corporate members intending to send their authorized representatives to attend the Annual General Meeting, pursuant to section 113 of the Companies Act, 2013, are requested to send to the company, a certified copy of the relevant Board Resolution together with the respective specimen signatures of those representatives authorized under the said resolution to attend and vote on their behalf at the meeting.
- IV. Members, Proxies and Authorised representatives are requested to bring to the meeting, the attendance slips enclosed herewith duly completed and signed mentioning therein details of DP ID and Client ID/Folio No.
- V. In case of joint holders attending the meeting, the joint holder who is higher in the order of names will be entitled to vote at the meeting.
- VI. The Register of Members and Share Transfer Books of the Company shall remain closed from Friday, 17 September 2021 to Friday, 24 September 2021 (both days inclusive) for determining the name of Members.
- VII. Shareholders desiring any information as regards the Accounts are required to write to the Company at least seven days in advance of the meeting so that the information, to the extent practicable, can be made available at the meeting.
- VIII. The Company has entered into necessary arrangement with National Securities Depository Limited (NSDL) also to enable the Shareholders to dematerialize their shareholding in the Company for which they may contact the Depository Participant.
- IX. In view of Go Green initiative being undertaken by the Company, Members who have not yet registered their e-mail address so far are requested to register/update their e-mail addresses with the Company's RTA or with the Company at svarnimudyog@gmail.com Shareholders holding shares in dematerialized form are requested to register their e-mail addresses and changes therein with the concerned Depositories through their Depository Participant.
- X. Members who are holding shares of the Company in physical form through multiple folios in identical order of names are requested to write to the Company, enclosing their share certificates, to enable the Company to consolidate their holdings in one folio.
- XI. Members are requested to contact the Company's RTA for reply to their queries/redressal of complaints.

SharwanMangla, Associates of Mas Services Limited
T-34, 2nd Floor, Okhla Industrial Area, Phase - II,
New Delhi -110 020.
Phn No: 26387281/82/83, Email: info@masserv.com

- XII. Pursuant to Regulation 36(3) of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 and Secretarial Standard-2 on General Meeting, the relevant details of Director seeking re-appointment is provided as below:

Details of Director Seeking Re-Appointment/Appointment at the Annual General Meeting

Name	Mr. Surbhi Aggarwal
Date of Birth	02/08/1983



Directors Identification Number (DIN)	08409763
Age	38
Qualification	MBA in finance
Date of first Appointment on board of the Company	01/05/2019
Shareholding in Svarnim Trade Udyog Limited	Nil
List of Directorship held in other companies	Nil
Membership/Chairmanships of Audit and Stakeholders relationship committees	Nil

- XIII. The route map showing directions to reach the venue of the Thirty Ninth AGM is annexed.
- XIV. The relevant documents referred to in this Notice are open for inspection at the Meeting and such documents will also be available for inspection in physical or in electronic form at the registered office and copies thereof shall also be available for inspection in physical or electronic form at the registered office from the date of dispatch of the Notice till the date of the Meeting on all working days, from 10:00 a.m. to 12:00 noon, on all 3 working days.

PROCESS FOR MEMBERS OPTING FOR E-VOTING

In compliance with provisions of Section 108 of the Companies Act, 2013, Rule 20 of the Companies (Management and Administration) Rules, 2014 as amended by the Companies (Management and Administration) Amendment Rules, 2015 and sub-clause (1) & (2) of Regulation 44 of SEBI (LODR) Regulations, 2015, the Company is pleased to provide members facility to exercise their right to vote on resolutions proposed to be considered at the ensuing Annual General Meeting (AGM) by electronic means and the business may be transacted through e-Voting Services. The facility of casting the votes by the members using an electronic voting system from a place other than venue of the AGM ("remote e-voting") will be provided by National Securities Depository Limited (NSDL). The detailed procedure to be followed in this regard has been given in Annexure – A to the notice. The members are requested to go through them carefully.

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)**
Sd/-
Surbhi Aggarwal
Chairman
(DIN:08409763)

Place: Kolkata
Date: September 02, 2021



STATEMENT PURSUANT TO SECTION 102(1) OF THE COMPANIES ACT, 2013

Item No. 3

M/s , H.R. Nampurwala & Co Chartered Accountants, were appointed as statutory auditor of the company in the 35rd Annual General Meeting of the company held in the year 2016, they are holding office of the auditor upto the conclusion of the 39th Annual General Meeting and hence, would retire at the conclusion of the forthcoming 39th Annual General Meeting.

On expiry of term of 5 years of M/s H.R. Nampurwala & Co, It is proposed to appoint, M/s. DGMS & Co, Chartered Accountants (Firm Registration No.128938W), Chartered Accountants (CAs), as the statutory auditors of the Company for financial year 2020-21 at the 39th Annual General Meeting (AGM) of the Company held on September 30, 2021 for consecutive 5 years till the conclusion of 43th Annual General Meeting to be held in the year 2026.

M/S. DGMS & Co. Chartered Accountants has given their consent to act as the Auditors of the Company and have confirmed that the said appointment, if made, will be accordance with the prescribed under Sections 139 and 141 of the Act.

In accordance with the disclosure required under Regulation 36(5) of the SEBI Listing Regulations, the Company hereby declares that the proposed fees payable to the M/S. DGMS & Co., Chartered Accountants (FRN -0112187W), if appointed by the shareholders, for performing the statutory audit function of the Company for the FY 2020-21. The fees for the future years may necessitate a nominal escalation based on mutual discussion and approval of the audit committee and the Board. The fees payable to the proposed statutory auditors is lower than the outgoing statutory auditor and the change is not material.

The Board recommends the Resolution at Item No. III for approval by the Members, as M/S. DGMS & Co., Chartered Accountants have the requisite credentials required for their appointment as the statutory auditors of the Company.

None of the Directors or Key Managerial Personnel (KMP) or relatives of directors and KMP is concerned or interested in the Resolution at Item No. 3 of the accompanying Notice.

Item No. 4

Mr. Bindess Kurrani (DIN: 08915870) was appointed as an Additional Director of the Company with effect from November 11,2020 in terms of Section 161 (1) of the Companies Act, 2013. He holds office as Director up to the date of the forthcoming Annual General Meeting ('AGM') and is eligible for appointment as a Director.

He does not hold any equity shares of the Company and is not related to any Director of the Company.

Mr. Bindess Kurrani holds a degree from Manipal University At present he is working as a Director.

As per the provisions of Section 149 of the Act, an Independent Director shall hold office for a term up to five consecutive years on the Board of a Company and is not liable to retire by rotation

In the opinion of the Board, Mr. Bindess Kurrani fulfils the conditions specified in the Act and the Rules made there under for appointment as Independent Director and she is an independent of the management.

In compliance with the provisions of Section 149 read with Schedule IV of the Act, the appointment of Mr. Bindess Kurrani as Independent Director is now being placed before the Members in General Meeting for her approval.



Mr. Bindess Kurrani is interested and concerned in the Resolution mentioned at Item No.4 of the Notice. Other than Mr. Bindess Kurrani, no other Director, Key Managerial Personnel or her respective relatives are concerned or interested in the Resolution mentioned at ItemNo.4 of the Notice.

Item No. 5

Mrs. Bhavika Dahyabhai Vankar (DIN: 09014060) was appointed as an Additional Director of the Company with effect from January 12, 2021 in terms of Section 161 (1) of the Companies Act, 2013. She holds office as Director up to the date of the forthcoming Annual General Meeting ('AGM') and is eligible for appointment as a Director.

She does not hold any equity shares of the Company and is not related to any Director of the Company.

Mrs. Bhavika Dahyabhai Vankar holds degree from Commerce from Mumbai University. At present she is working as a Director.

As per the provisions of Section 149 of the Act, an Independent Director shall hold office for a term up to five consecutive years on the Board of a Company and is not liable to retire by rotation

In the opinion of the Board, Mrs. Bhavika Dahyabhai Vankar fulfils the conditions specified in the Act and the Rules made there under for appointment as Independent Director and she is an independent of the management.

In compliance with the provisions of Section 149 read with Schedule IV of the Act, the appointment of Mrs. Bhavika Dahyabhai Vankar as Independent Director is now being placed before the Members in General Meeting for her approval.

Mrs. Bhavika Dahyabhai Vankar is interested and concerned in the Resolution mentioned at Item No.4 of the Notice. Other than Mrs. Bhavika Dahyabhai Vankar, no other Director, Key Managerial Personnel or her respective relatives are concerned or interested in the Resolution mentioned at ItemNo.5 of the Notice.

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)**

Sd/-

**Surbhi Aggarwal
Chairman
(DIN:08409763)**

Place: Kolkata

Date: September 02, 2021



Annexure A to the notice
Instruction for the voting through electronic means

- I. In compliance with provisions of Section 108 of the Companies Act, 2013, Rule 20 of the Companies (Management and Administration) Rules, 2014 as amended by the Companies (Management and Administration) Amendment Rules, 2015 and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, the Company is pleased to provide members facility to exercise their right to vote on resolutions proposed to be considered at the ensuing Annual General Meeting (AGM) by electronic means and the business may be transacted through e-Voting Services. The facility of casting the votes by the member's using an electronic voting system from a place other than venue of the AGM ("remote e-voting") will be provided by National Securities Depository Limited (NSDL).
- II. It is clarified that it is not mandatory for a member to cast vote using e-voting facility. The facility for voting through ballot paper shall also be made available at the venue of the AGM and the members attending the AGM, who have not cast their vote by remote e-voting shall be able to exercise their voting rights at the meeting through ballot paper.
- III. The members who have cast their vote by remote e-voting prior to the AGM may also attend the AGM but shall not be entitled to cast their vote again.
- IV. The remote e-voting period commences on Monday, 27th September, 2021 at 9:00 a.m and ends on Wednesday 29th September, 2021 at 5:00 p.m. During this period members of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date of 23rd September, 2021, may cast their vote by remote e-voting. The remote e-voting module shall be disabled by NSDL for voting thereafter. Once the vote on a resolution is cast by the member, the member shall not be allowed to change it subsequently.
- V. A person who is not a member as on the cut-off date should treat the Notice for information purpose only.
- VI. The details of the process and manner for remote e-voting are explained herein below:

Step 1: Log-in to NSDL e-Voting system at <https://www.evoting.nsdl.com/>

Step 2: Cast your vote electronically on NSDL e-Voting system.

How to Log-in to NSDL e-Voting website?

1. Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <https://www.evoting.nsdl.com/> either on a Personal Computer or on a mobile.
2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholders' section.
3. A new screen will open. You will have to enter your User ID, your Password and a Verification Code as shown on the screen.

Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at <https://eservices.nsdl.com/> with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. Your User ID details are given below :

Manner of holding shares i.e. Demat	Your User ID is:
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(NSDL or CDSL) or Physical	
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example, if your DP ID is IN300*** and Client ID is 12***** then your user ID is IN300***12*****
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example, if your Beneficiary ID is 12***** then your user ID is 12*****
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example, if EVEN is 101456 and folio number is 001*** then user ID is 101456001***

5. Your password details are given below:

- a. If you are already registered for e-Voting, then you can use your existing password to login and cast your vote.
- b. If you are using NSDL e-Voting system for the first time, you will need to retrieve the ‘initial password’ which was communicated to you. Once you retrieve your ‘initial password’, you need to enter the ‘initial password’ and the system will force you to change your password.
- c. How to retrieve your ‘initial password’? i)
 - i. If your email ID is registered in your demat account or with the company, your ‘initial password’ is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your ‘User ID’ and your ‘initial password’. I
 - ii. If your email ID is not registered, your ‘initial password’ is communicated to you on your postal address.

6. If you are unable to retrieve or have not received the “initial password” or have forgotten your password:

- a) Click on **“Forgot User Details/Password?”** (If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com
- b) **“Physical User Reset Password?”** (If you are holding shares in physical mode) option available on www.evoting.nsdl.com

If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address.

7. After entering your password, click on Agree to “Terms and Conditions” by selecting on the check box.
8. Now, you will have to click on “Login” button.
9. After you click on the “Login” button, Home page of e-Voting will open.



Details on Step 2 are mentioned below:

How to cast your vote electronically on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see the Home page of e-Voting. Click on e-Voting. Then, click on Active Voting Cycles. After click on Active Voting Cycles, you will be able to see all the companies “EVEN” in which you are holding shares and whose voting cycle is in active status.
2. Select “EVEN” of the Company, which is _____
3. Now you are ready for e-Voting as the Voting page opens.
4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on “Submit” and also “Confirm” when prompted.
5. Upon confirmation, the message “Vote cast successfully” will be displayed.
6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
7. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

General Guidelines for shareholders

1. Institutional shareholders (i.e. other than individuals, HUF, NRI, etc.) are required to send a scanned copy (PDF/JPG Format) of the relevant Board Resolution/Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by email to
 2. **kavirajoshi@gmail.com** with a copy marked to **evoting@nsdl.co.in**
 3. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the “Forgot User Details/Password?” or “Physical User Reset Password?” option available on www.evoting.nsdl.com to reset the password.
 4. In case of any queries, you may refer to the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of **www.evoting.nsdl.com** or call on toll free no.: 1800-222-990 or send a request at evoting@nsdl.co.in O.
- VII. In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Members and remote e-voting user manual for Members available at the downloads section of **www.evoting.nsdl.com** or call on toll free no.:1800-222-990.
- VIII. If you are already registered with NSDL for remote e-voting, then you can use your existing user ID and password/PIN for casting your vote.
- IX. You can also update your mobile number and e-mail id in the user profile details of the folio which may be used for sending future communication(s).
- X. The voting rights of members shall be in proportion to their shares of the paid-up equity share capital of the Company as on the cut-off date of 23rdSeptember, 2021.
- XI. Any person, who acquires shares of the Company and become member of the Company after dispatch of the notice and holding shares as of the cut-off date i.e. 23rdSeptember, 2021, may obtain the login ID and password by sending a request at [evoting nsdl.co.in](http://evoting.nsdl.co.in) or RTA.



However, if you are already registered with NSDL for remote e-voting then you can use your existing user ID and password for casting your vote. If you forgot your password, you can reset your password by using “Forgot User Details/Password” option available on www.evoting.nsdl.com or contact NSDL at the following toll free no.: 1800-222-990.

- XII. 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 /voting at the AGM through ballot paper.
- XIII. Mr. Kavita R. JoshiPCS, (CP Registration No. 8893), Practicing Company Secretary, has been appointed as the Scrutinizer to enable the voting and remote e-voting processes to be conducted in a fair and transparent manner.
- XIV. The Chairman shall, at the AGM, at the end of discussion on the resolutions on which voting is to be held, allow voting with the assistance of scrutinizer, by use of “Ballot Paper” / “Polling Paper” for all those members who are present at the AGM but have not cast their votes by availing the remote e-voting facility.
- XV. The Scrutinizer shall after the conclusion of voting at the general meeting, will first count the votes cast at the meeting and thereafter unblock the votes cast through remote e-voting in the presence of at least two witnesses not in the employment of the Company and shall make, not later than two days of the conclusion of the AGM, a consolidated scrutinizer’s report of the total votes cast in favour or against, if any, to the Chairman or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.
- XVI. The Results declared alongwith the report of the Scrutinizer shall be placed on the website of the Company www.svarnim.comto.in and on the website of NSDL immediately after the declaration of result by the Chairman or a person authorized by him in writing. The results shall also be immediately forwarded to the BSE Limited, Mumbai.



SVARNIM TRADE UDYOG LIMITED
(CIN-L65993WB1982PLC035067)

Regd Office: 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India
THIRTY NINTH ANNUAL REPORT 2021-21

ATTENDANCE SLIP

39th Annual General Meeting –30th September, 2021

I hereby record my presence at the **THIRTY NINTH ANNUAL GENERAL MEETING** of the Company held at 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India on Thursday, September 30, 2021 at 4.00 p.m.

Full Name of the Member (in BLOCK LETTERS) _____

Regd. Folio No.. _____ No. of Shares held _____

DP ID No. _____ ClintID No. _____

Full name of the Proxy (in BLOCK LETTERS) _____

Member's / Proxy's Signature



SVARNIM TRADE UDYOG LIMITED
(CIN-L65993WB1982PLC035067)

Regd Office: 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India
THIRTY SEVENTH ANNUAL REPORT 2020-21

PROXY FORM

39th Annual General Meeting - September 30, 2021

CIN : L65993WB1982PLC035067
Name of the Company : Svarnim Trade Udyog Limited
Registered office : 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001
Name of the member(s) : _____
Registered address : _____

Folio No. / DP ID / Client ID* _____

I / We, being the member(s) of _____ shares of Svarnim Trade Udyog Limited, hereby appoint

1. Name _____
Address _____
E-mail ID _____
Signature _____ or failing him/her _____

2. Name _____
Address _____
E-mail ID _____
Signature _____ or failing him/her _____

and whose signature(s) are appended below as my/our proxy to vote for me/us on my/our behalf at the **39th ANNUAL GENERAL MEETING** of the Company to be held at 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001 on Thursday, September 30, 2021 at 4.00 p.m. and at any adjournment thereof.

Item No.	Resolution	Type of Resolution	No.Of Shares	For (√)	Against (x)
1.	Adoption of Statement of Profit & loss, Balance Sheet, Report of Board of Directors of the Company	Ordinary			
2.	To appoint a Director in place of Ms. Surbhi Aggarwal (DIN: 08409763) who retires by rotation and being eligible, has offered himself for e-appointment.	Ordinary			
3.	To Appointment of Auditor	Ordinary			
4.	Regularization of Additional Director, Mr. Bindess Kurrani (DIN: 08915870) as Director of the company.	Ordinary			
5.	Regularization of Additional Director, Mrs. Bhavika Dahyabhai Vankar (DIN: 09014060) as Director of the company.	Ordinary			

Signed this _____ day of _____ 2021
Signature of Shareholder _____
Signature of Proxy holder(s) _____

Affix
Revenue
Stamp
Signatur

Note: This form of Proxy in order to be effective should be duly submitted and deposited at the Registered Office of the Company, not less than (48)forty-eight hours before the commencement of the meeting i.e. before 4.00 p.m. on 30th September, 2021



SVARNIM TRADE UDYOG LIMITED
(CIN-L65993WB1982PLC035067)

Regd Office: 3A, Mangoe Lane 1ST Floor Surana House Kolkata –WB 700001, India

THIRTY NINTH ANNUAL REPORT 2020-21

BALLOT FORM

(To be returned to Scrutinizer appointed by the Company)

Name and Registered Address of the sole / First	:	
Name (s) of the Joint Holder (s) (if any)	:	
Registered Folio No./ DP ID No. And Client ID No.	:	
Number of share(s) held	:	
EVEN (e-voting EVEN Number)	:	
User ID & Password	:	If you are registered with NSDL on e-voting system, please use your existing used ID and password. If you are a first time user follow the steps given in Note No. 5Bannexure to the AGM Notice.

I / We hereby exercise my / our vote(s) in respect of the Resolutions set out in the Notice of the Thirty Seventh Annual General Meeting (AGM) of the Company to be held at 3A, Mangoe Lane 1ST Floor Surana House Kolkata –WB 700001, India on Thursday, September 30, 2021 at 4.00p.m. and at any adjournment thereof by sending my / our assent or dissent to the said Resolutions by placing the tick (✓) mark at the appropriate box below:

Item	Resolution	Type of Resolution	No. Of Shares	For (✓)	Against (x)
1.	Adoption of Statement of Profit & loss, Balance Sheet, Report of Board of Directors of the Company.	Ordinary			
2.	To appoint a Director in place of Ms. Surbhi Aggarwal (DIN: 08409763) who retires by rotation and being eligible, has offered himself for e-appointment.	Ordinary			
3.	To Appointment of Auditor	Ordinary			
4.	Regularization of Additional Director, Mr. Bindess Kurrani (DIN: 08915870) as Director of the company.	Ordinary			
5.	Regularization of Additional Director, Mrs. Bhavika Dahyabhai Vankar (DIN: 09014060) as Director of the company.	Ordinary			

Place:

Date:

(Signature of Member)

Note: Please read the instructions carefully before exercising your vote



BOOK POST

To,

If undelivered please return to:
Registered Office Address
Svarnim Trade Udyog Limited
3-A, Surana House, 1st Floor,
Mangoe Lane, Kolkata-700001

SVARNIM TRADE UDYOG LIMITED
(CIN-L65993WB1982PLC035067)

Regd Office: 3A, Mangoe Lane 1ST Floor Surana House Kolkata -WB 700001, India
THIRTY NINETH ANNUAL REPORT 2020-21

DIRECTORS' REPORT

To,
The Shareholders,

Your Directors have pleasure in presenting the 39th Annual Report along with the Audited Financial statements of the Company for the financial year ended 31st March, 2021.

1. Financial Results:

Particulars	For the Year ended on March 31, 2021	For the Year ended on March 31, 2020
Total Income	89,40,000.00	32,50,000.00
Total Expenditure	4,49,30,000.00	32,18,000.00
Profit/(Loss) before taxation	(3,59,89,000.00)	32000.00
Provision for Tax	0	0
Profit/(Loss) after Taxation	(3,59,89,000.00)	32000.00

2. Dividend:

To conserve the resources for business expansion your Directors have not recommended any dividend for the financial year ended March 31, 2021.

3. Change in nature of Business:

There was no change in nature of business activity during the year.

4. Deposits:

The company has not accepted any deposits within the meaning of Section 73 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules, 2014.

5. Reserve:

No amount as been transferred to the General Reserve during the year.

6. Share capital:

The paid-up share capital of the Company was Rs. 2,43,15,000/- (Rupees Two Crores Forty Three Lacs Fifteen Thousand only) during the year divided in to 2,43,15,000 Equity Shares of Rs. 1/- each. during the year under review.

7. Directors and Key Managerial Personnel

- i) As per the provisions of Section 149 and 152 of the Companies Act, the shareholders at their Annual General Meeting held on 30th September, 2020 (Last years AGM) had approved the re-

- appointment of all existing Independent Directors of the Company for tenure of up to five consecutive years. None of the Independent Directors are liable to retire by rotation.
- ii) In accordance with section 149(7) of the Companies Act, 2013, each Independent Director has confirmed to the Company that he or 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 Disclosure Requirements) Regulations, 2015.
 - iii) Further, in accordance with provisions of Section 152 of the Companies Act, 2013, read with the Companies (Appointment and Qualification of Directors) Rules, 2014 and the Articles of Association of your Company Mrs. Surbhi Aggrawal, Director, of the Company is liable to retire by rotation at the ensuing AGM and being eligible offered her for reappointment.
 - iv) Mr BindessKurani (DIN 08915870) was appointed on November 12, 2020 as Additional Director in the category of Independent Director. He has expressed her desire to be re appointed as an Independent Director not liable to retire by rotation of the company. In accordance with the provisions of section 160 (1) of the Companies Act,2013, company has received a notice from one of the members signifying her candidature. Further, Mr BindessKurani, has submitted a declaration that he meets the criteria for independence as provided in Section 149 (6) of the Act and Regulation 16 (b) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, Mr Bindess Kurani holds a Master in Business Administration degree from Manipal University At present he is working as a Director.
 - v) Mrs. Bhavika Dahyabhai Vankar(DIN: 09014060) was appointed on January 12, 2021 as Additional Director in the category of Independent Director. She has expressed her desire to be re appointed as an Independent Director not liable to retire by rotation of the company. In accordance with the provisions of section 160 (1) of the Companies Act, 2013, company has received a notice from one of the members signifying her candidature. Further, Mrs. Bhavika Dahyabhai Vankar, has submitted a declaration that she meets the criteria for independence as provided in Section 149 (6) of the Act and Regulation 16 (b) of the SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, Mrs. Bhavika Dahyabhai Vankarholds a Commerce degree from Mumbai University. At present she is working as a Director.
 - vi) Mrs. Jyotsna Sosa has resigned from the post of Directorship with effect from 31st December 2020 due to personal reasons and pre-occupation with other commitments.
 - vii) Mr. Dhiraj Sosa has resigned from the post of Directorship with effect from 5th May 2021 due to personal reasons and pre-occupation with other commitments.

8. Board Meetings:

During the year under review 4 (Four) meetings were held. The dates of meetings are June 30, 2020, August 28, 2020, November 12, 2020 and February 12, 2021.

9. Particulars of loans, guarantees or investments:

The company has not given any loans or guarantees covered under the provisions of section 186 of the Companies Act, 2013.

10. Contracts and arrangements with related parties:

During the period under review there were no contracts or arrangements made with related parties as defined under section 188 of the Companies Act, 2013.

11. Material Changes and Commitments affecting the Financial Position of the Company:

There have been no material changes and commitments, if any, affecting the financial position of the company which have occurred between the end of the financial year to which the financial statements relate and the date of the report.

12. Internal control systems and their adequacy:

The Company has an Internal Control System, commensurate with the size, scale and complexity of its operations. The scope and authority of the Internal Audit function is defined in the Internal Audit Manual. To maintain its objectivity and independence, the Internal Audit function reports to the Chairman of the Audit Committee of the Board & to the Chairman & Whole Time Director.

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 the Audit Committee of the Board.

13. Corporate Social Responsibility (CSR) Initiatives:

The provisions of Corporate Social Responsibilities (CSR) provided in section 135 of the Companies Act, 2013 is not applicable to the company. Hence, the company has not developed and implemented any CSR initiatives.

14. Equity Shares with Differential Rights:

The Company has not issued any equity shares with differential voting rights.

15. Disclosure regarding issue of Employee Stock Options:

The Company has not issued shares under employee's stock options scheme pursuant to provisions of Section 62 read with Rule 12(9) of Companies (Share Capital and Debenture) Rules, 2014

16. Director's Responsibility Statement:

To the best of our knowledge and belief and according to the information and explanations obtained by us, your Directors make the following statements in terms of Section 134(5) of the Companies Act, 2013:

- i. In the preparation of the annual accounts, the applicable accounting standards have been followed.
- ii. 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 or loss of the Company for the year under review.
- iii. 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.
- iv. The directors have prepared the annual accounts on a going concern basis.
- v. The directors had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
- vi. The directors had devised proper system to ensure compliance with the provisions of all applicable laws and that such system were adequate and operating effectively.

17. Statementon Declaration given by the Independent Directors under section 149(6)of the Companies Act, 2013:

All Independent Directors of your Company have given a declaration pursuant to Section 149(7) of the Companies Act, 2013 affirming compliance to the criteria of Independence as laid down under Section 149(6) of the Companies Act, 2013 and Regulation 25 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and that they are not disqualified to become Directors

under the Act. Based on the declaration(s) of Independent Directors, the Board of Directors recorded its opinion that all Independent Directors are independent of the Management and have fulfilled the conditions as specified in the Companies Act, 2013 and the Rules made thereunder.

18. Statutory Auditors:

M/s. H.R. Nampurwala & Co, Chartered Accountants, were appointed as statutory auditor of the company in the 35th Annual General Meeting of the company held in the year 2016, they are holding office of the auditor upto the conclusion of the 39th Annual General Meeting and hence, would retire as their term would be expiring at the forthcoming 39th Annual General Meeting.

M/s. DGMS & Co, Chartered Accountants (Firm Registration No. 0112187W), Chartered Accountants (CAs), proposed to be appointed as statutory auditors of the Company for financial year 2020-21 at the 39th Annual General Meeting (AGM) of the Company held on September 30, 2021 for the consecutive five(5) years till the conclusion of 42th Annual General Meeting to be held in the year 2026.

M/s. J.M/s. DGMS & Co, Chartered Accountants (Firm Registration No. 0112187W), have consented to the said appointment and confirmed that their appointment, if made, would be within the limit specified under Section 141(3)(g) of the Act. They have confirmed that they are not disqualified to be appointed as statutory auditor in terms of the provisions of the proviso to Section 139(1), Section 141(2) and Section 141(3) of the Act and the provisions of the Companies (Audit and Auditors) Rules, 2014. The Audit Committee and the Board of Directors have recommended the appointment of M/s. DGMS & Co, Chartered Accountants (Firm Registration No. 0112187W), as statutory auditors of the Company from the conclusion of the 39th AGM till the conclusion of 43th AGM, to the shareholders.

19. Statutory Auditors' Observations:

The notes on financial statements referred to in the Auditors' Report are self-explanatory and do not call for any further comments. The Auditors Report does not contain any qualification, reservation or adverse remark.

20. Secretarial Audit Report:

Pursuant to provisions of section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 the company has appointed Ms. Kavita Raju Joshi, Practicing Company Secretary as Secretarial Auditor of the Company. The Secretarial Audit Report is appended to this report as **Annexure 1**.

21. Board's Response on Auditors Qualification, Reservation or adverse remark or disclaimer made:

There are no qualifications, reservations or adverse remarks made by the Statutory Auditors in their report or by the Company Secretary in Practice in the Secretarial Audit Report.

22. Risk Management:

The Board has formed a risk management committee to frame, implement and monitor the risk management plan for the Company. The committee is responsible for reviewing the risk management plan and ensuring its effectiveness. The audit committee has additional oversight in the area of financial risks and controls.

23. Disclosure regarding issue of Sweat equity Shares

The Company has not issued sweat equity shares pursuant to provisions of Section 54 read with Rule 8 of Companies (Share Capital and Debenture) Rules, 2014 during the Financial Year.

24. Disclosure regarding Issue of Employee Stock Options :

The Company has not issued shares under employee's stock options scheme pursuant to provisions of Section 62 read with Rule 12(9) of Companies (Share Capital and Debenture) Rules, 2014.

25. Extract of Annual Return:

In pursuant to the provisions of Section 92 of the Companies Act, 2013 and Rule 12 of the Companies (Management and Administration) Rules, 2014, Extract of Annual Return is available in www.svarnim.com.

26. Subsidiary Companies/ Associate Companies/ Join Venture:

Since the Company does not have any subsidiary / Joint Ventures / Associate Concern, no financial position of such concern(s) are required to be included in the financial statement.

27. Code of Conduct:

The Company has laid down a code of conduct for all Board members and senior management and Independent Directors of the Company. All the Board members including independent directors and senior management personnel have affirmed compliance with the code of conduct.

28. Vigil Mechanism:

The Company has established a vigil mechanism and overseas through the committee, the genuine concern expressed by the employees and other Directors. The Company has also provided adequate safeguard against victimization of employees and Directors who express their concerns. The Company has also provided direct access to the chairman of the Audit Committee on reporting issue concerning the interests of co employees and Company.

29. Corporate Governance and Report:

As per the requirement of SEBI Circular No. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 No. SEBI/LAD-NRO/GN/2015- 16/013 dated September 2, 2015, the listed companies having paid up equity share capital not exceeding Rs. 10 Crores and Net Worth not exceeding Rs. 25 Crores, as on the last day of the previous financial year is not required to comply with the norms of the Corporate Governance Report. Since, the paid-up equity share capital of the company is Rs.2, 43, 15,000 and Net Worth not exceeding Rs. 25 Crores as on financial year ending 31st March 2021, therefore, the provisions relating to the Corporate Governance report are not applicable the company.

30. Compliance with Secretarial Standards on Board and General meeting

During the year under review, the Company has complied with the applicable Secretarial Standards i.e. SS-1 and SS-2, relating to "Meetings of the Board of Directors" and "General Meetings", respectively, issued by The Institute of Company Secretaries of India.

31. Cost Auditor

The appointment of Cost Auditor for the Company is not applicable to the Company

32. Significant and Material Orders:

There are material orders passed by Regulators, Courts or Tribunals impacting the going concern status and company's operations in future.

33. Conservation of Energy, Technology Absorption and Foreign Exchange Earning And Outgo:

In the year under review, there are no manufacturing activities undertaken by the company. In view of the aforesaid fact, there was no scope for your company to make any effort for energy conservation, research and development and technology absorption. Hence the particulars required to be furnished in respect of the same are not given.

Foreign Exchange Earnings: NIL

Foreign Exchange Outgoes: NIL

34. Disclosure as required under Section 22 Sexual Harassment Of Women at Workplace (Prevention, Prohibition & Redressal) ACT, 2013:

The Company has duly set up an Internal Complaints Committee (ICC) in line with the requirements of The Sexual Harassment of Women at the Workplace (Prevention, Prohibition & Redressal) Act, 2013, to redress complaints received regarding sexual harassment.

The following is a summary of sexual harassment complaints received and disposed off during the year 2020-21.

No of complaints received: Nil

No of complaints disposed off: Nil

35. APPRECIATION:

We record our gratitude to the Banks and others for their assistance and co-operation during the year. We also wish to place on record our appreciation for the dedicated services of the employees of the Company. We are equally thankful to our esteemed investors for their co-operation extended to and confidence reposed in the management.

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)**

Sd/-

**Surbhi Aggarwal
Chairman
(DIN:08409763)**

Place: Kolkata

Date: September 02, 2021

FORM NO. MR-3

**ANNEXURE 1 TO BOARDS REPORT
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31.03.2021**

**[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies
(Appointment and Remuneration Personnel) Rules, 2014]
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED 31.03.2021**

To,
The Members,
Svarnim Trade Udyog Limited

3A Mangoe Lane, 1st floor,
Surana House,
Kolkata – 700001.

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **M/s.Svarnim Trade Udyog Limited, CIN: L65993WB1982PLC035067** ("the Company"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my 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 authorised representatives during the conduct of secretarial audit, I hereby report that in my opinion, the Company has, during the audit period covering the financial year ended on 31st March 2021, 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:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March 2021, according to the provisions of:

- i. The Companies Act, 2013 (the Act) and the rules made thereunder;
A. It is hereby reported that pursuant to Section 149 of the Companies Act, 2013 1/3rd of board and consist of Independent Directors and there should be a combination of Executive/Non-executive and Independent Director.
- ii. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- iii. The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;

- iv. Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings- **(not applicable to the company)**;
- v. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - a. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - b. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992;
 - c. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
 - d. The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 – **(not applicable to the company)**;
 - e. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- **(not applicable to the company)**;
 - f. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - g. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009- **(not applicable to the company)**; and
 - h. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998- **(not applicable to the company)**;

Note: The company is non-compliant/not paid fines with the provisions of following Regulation(s) for the period mentioned below. As mandated in the SEBI SOP circular the company has been intimated about the pending compliance and has also been informed that **all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid.**

The details of fines outstanding, inter alia, pursuant to SEBI SOP Circular dated January 22, 2020 are as under:

Applicable Regulation of SEBI (LODR) Regulations, 2015	Fine amount outstanding (incl. GST @ 18 %) (Amount in Rs.)	Fines levied for	Fines calculated till
Regulation 33	259600	December 2020	In case on non-compliance, fines calculated as on March 31, 2021
Regulation 29(2)/29(3)	0		
Total Fines	259600	-	-

As per Exchange records, it is observed that the company **has not yet complied/ not paid the fines.** Therefore, as in duty bound in terms of the provisions of SEBI SOP circular the Exchange would be proceeding to give instructions to the depositories to **freeze the demataccounts of all the entities mentioned in the shareholding pattern by the company, within 10 days from the date of this communication.**

I further report that, having regard to the compliance system prevailing in the Company and on examination of the relevant documents and records in pursuance thereof, on test-check basis, the Company has substantially complied with the general laws applicable to the Company. Based on the information, explanations and management representation, the Company has substantially complied with the Tax laws applicable to the Company.

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

- i. Secretarial Standard on Meetings of the Board of Directors (SS-1) and General Meetings (SS-2) issued by The Institute of Company Secretaries of India (ICSI) effective from 1st July, 2015.
- ii. The Listing Agreements entered into by the Company with the Stock Exchange(s) namely BSE Limited (BSE) read with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

During the period under review, the Company has complied with the provisions of the Act, Rules, Regulations, Listing Agreement with Stock Exchanges, Guidelines, Standards, etc. mentioned above. I further report that:

1. The website of the Company is not maintained,
2. During the year, the gap of board meeting is exceeding 120 days(Due to Covid 19)
3. The Board of Directors of the Company is not duly constituted with proper balance of Executive Director, Non-executive Directors, Woman Director and Independent Directors. During the year Ms. BhavikaDahyabhaiVankar have appointed as Additional Director of the Company from 12th January, 2021. On 12th January, 2021, Mrs. JyotsnaDhiraj Sosa had resigned as an Independent Director of the Company.
During the year Ms. RinkyAmarjeetGupta has appointed as a Whole Time Company Secretary of the Company from 12th January, 2021 and Mrs. DiptiVartakhave resigned from a Whole Time Company Secretary of the Company on 12thJanuary, 2021.
4. 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.
5. 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 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. Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.
6. I 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.

I further report that during the audit period:

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.

I further report that the management is responsible for compliance of all business laws and other applicable laws. This responsibility includes maintenance of Statutory register/files as required by the concerned authorities and internal control of the concerned department.

I Further report that during the year under review, the Company has not issue Public Issue and has no specific Right Issue/Preferential issue of Shares/ Debentures/Sweat Equity/Redemption/ Buy-Back of Securities/ Merger/ Amalgamation/ Reconstruction/ Foreign Technical Collaborations.

KavitaRaju Joshi
Practising Company Secretary
Membership No: 9074
CP No: 8893

Place: Mumbai
Date: September 2, 2021

This report is to be read with my letter of even date which is annexed as Annexure A and forms integral part of this report

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

- **Overall Review:**

Working and operational parameters at all the plants of the Company were satisfactory during the year under review but profitability was adversely affected due to higher input costs on the one hand and severe pressure on selling prices on the other, for almost all the products manufactured by the Company.

- **Industry Structure, Developments and Performance:**

For the Textiles industry, the global focus is shifting from China to India due to cost and stability factors. The government's positive steps are expected to help this shift and if a foreign investment in textiles retail materializes, the consumption of the textile products in the domestic market should increase in the years to come.

The Company trades entire range of fabrics. It has well established span in India for dealer network of its wholesale business. The company has made a big and successful foray in to mega retail business.

In the long term, the demand for textile and clothing is on rise globally and the Indian market is in the forefront. Despite the weak sentiments, which we have witnessed last year within India and globally, the Indian textile and clothing industry is expected to continue to grow due to the burgeoning domestic market and the opportunities in the global market.

- **Opportunities & Threats:**

There is scope for growth in the textile industry as India's share in the global trade in textiles is weak, compared to other countries, based on the availability of raw material and skills. The free trade environment is a good opportunity for Indian textile industry to increase its share in the global market.

The company does not foresee any immediate threat to its domain merely because of size of its operations. Being a manufacturer, a wholesaler and its retail operations all skewed together in one company are in fact. The key factors that other competitors finds difficult to dislodge the company from its leadership position.

The company has kept pace with the advancements around and forged its synergies in innovation techniques and competes well in design and development of its range of products to beat the competition, persistent with constant innovation, astute pricing policy and highest quality standards.

- **Outlook:**

Our textile unit has increased sales to direct brands and major retail chain stores in India and abroad, which should further improve our quality, design and demand where the Company should get better realization. We are hopeful of a better year ahead.

- **Risks & Concerns:**

The company remains apprehensive about possible changes in government policies which might adversely affect the purchasing power of consumers. The company is equally concerned, about revival of economy that should propel to increase the demand and see buoyancy coming back in the market sentiments, amongst the factors which are vital for sustaining overall growth. The company is hopeful that by enlarging its capacities, retail expansion being undertaken, constantly bringing in new products through innovation and employing new marketing strategies will greatly help it in mitigating the adverse impacts apprehended above.

- **Internal Control System & Adequacy:**

The Company has an adequate internal control system which commensurate with the size and nature of its business. The internal control system is being supported by internal audits, regular reviews by management to ensure reliability of financial and all other records to prepare financial statements and other data. Further the Audit Committee of the Board review the findings and recommendations of the internal audit and suitable implementations are affected.

- **Material development in Human Relation/ Industrial Relations Front including number of people employed:**

The Company firmly believes that Human Resource Development strategies and practices will continue to provide a sustained competitive advantage and will continuously work towards nurturing and enhancing a competitively superior position in terms of human capital, people processes and employees behaviour. Your company believes that it is the quality and dynamism of its human resources that will enable it makes a significant contribution to creating enhanced values.

- **Discussion on Financial Performance:**

During the year under review, your Company has registered a turnover of nil as compared to 89.40 Lakhs in the previous year.

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)**

Sd/-

Surbhi Aggarwal

Chairman

(DIN:08409763)

Place: Kolkata

Date: September 02, 2021

Declaration by the Executive Director regarding compliance with Code of Conduct as provided under SEBI (Listing Obligations and Disclosure requirement) Regulations, 2015

In accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, I hereby confirm and declare that, all the Directors and the Senior Management Personnel of the Company have affirmed compliance with the Code of Conduct for Directors & Senior Managerial Personnel of the Company laid down for them for the financial year ended 31st March, 2021

**By order of the Board of Directors
For SVARNIM TRADE UDYOG LIMITED)**

Sd/-

**Surbhi Aggarwal
Chairman
(DIN:08409763)**

Place: Kolkata

Date: September 02, 2021



Independent Auditor's Report on the Quarterly and year to date Audited Standalone Annual Financial Results of the Svarnim Trade Udhog Limited Pursuant to the Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended)

To

The Board of Directors of Svarnim Trade Udhog Limited.

Opinion

1. We have audited the accompanying standalone annual financial results (the 'Statement') of Svarnim Trade Udhog Company Limited (the 'Company') for the quarter ended March 31, 2021 and year to date results for the period April 2020 to 31st March 2021, attached herewith, being submitted by the Company pursuant to the requirements of Regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) ('Listing Regulations'), including relevant circulars issued by the SEBI from time to time.

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

(i) presents financial results in accordance with the requirements of Regulation 33 of the Listing Regulations; and

(ii) gives a true and fair view in conformity with the applicable Indian Accounting Standards ('Ind AS') prescribed under Section 133 of the Companies Act, 2013 (the 'Act'), read with relevant rules issued thereunder, and other accounting principles generally accepted in India, of the standalone net profit after tax and other comprehensive income and other financial information of the Company for the year ended 31st March 2021.

Basis for Opinion

3. We conducted our audit in accordance with the Standards on Auditing ('SAs') specified under section 143(1 O) of the Act. Our responsibilities under those standards 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 (the 'ICAI') together with the ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act and the rules there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence obtained by us, is sufficient and appropriate to provide a basis for our opinion.



Responsibilities of Management and Those Charged with Governance for the Statement

4. This Statement has been prepared on the basis of the standalone annual audited financial statements and has been approved by the Company's Board of Directors. The Company's Board of Directors is responsible for the preparation and presentation of the Statement that gives a true and fair view of the net profit/ loss and other comprehensive income and other financial information of the Company in accordance with the accounting principles generally accepted in India, including Ind AS prescribed under Section 133 of the Act, read with relevant rules issued there under 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 gives a true and fair view and is free from material misstatement, whether due to fraud or error.

5. In preparing the Statement, the Board of Directors is 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.

6. The Board of Directors is also responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Statement

7. Our objectives are to obtain reasonable assurance about whether the Statement as a whole is 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 Standards on Auditing, specified under section 143(10) of the Act, 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 this Statement.



8. As part of an audit in accordance with the Standards on Auditing, 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 on whether the Company has in place adequate internal financial controls with reference to financial statements 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 management.
- Conclude on the appropriateness of the management's 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 Statement 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 represents the underlying transactions and events in a manner that achieves fair presentation.

9. 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.



10. 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.

Our opinion is not modified in respect of above matter.

For D G M S & Co
Chartered Accountants
Firm Reg No 112187w

SHASHANK
PRAVINCHAN
DRA DOSHI

Digitally signed by SHASHANK PRAVINCHAN DRA DOSHI
DN: cn=SHASHANK PRAVINCHAN DRA DOSHI,
email=shashank.pra@dgms.co.in, o=DGMS & Co.,
ou=112187w, c=IN
2.5.4.21=sha256/218413d48d8a96b3b391ab9e0f
230a1176265057242380a801050e; cn=Doshi
Date: 2021.06.30 12:59:13 +05'30'

CA. Shashank P Doshi

Partner

Membership No 108456

UDIN 21108456AAAAEQ4983

Date 30 June 2021

Place: Mumbai

SVARNIM TRADE UDYOG LTD
BALANCE SHEET AS AT MARCH 31 2021

	Note No.	INR	
		As at end of	
		Current Reporting Period	Current Reporting Period
		March 31, 2021	March 31, 2020
EQUITY AND LIABILITIES :			
1 Shareholders' Funds :			
a) Share Capital	2	24,315,000	24,315,000
b) Reserves and Surplus	3	(20,867,941)	15,093,802
c) Money received against share warrants			
2 Share application money pending allotment			
3 Non - Current Liabilities :			
4 Current Liabilities :			
a) Trade Payable	4		14,384,500
b) Other Current Liabilities		-	
c) Short Term Provision	5	200,000	130,000
		3,647,059	53,923,302
ASSETS :			
1 Non - Current Assets :			
a) Fixed Assets		-	
i) Tangible Assets	a	-	
ii) Intangible Assets	b	-	
iii) Capital Work In Progress	6	-	36,875,575
b) Non Current Investments			
2 Current Assets :			
a) Trade Receivable	7	2,290,950	16,953,727
b) Cash and Cash Equivalents	8	1,356,109	94,000
c) Short Term Loans & Advances			
d) Other Current Assets		-	
		3,647,059	53,923,302
As per our report of even date			
For DGMS & Co		For And On Behalf Of the board od Directors	
Chartered Accountants		Svarnim Trade Udyog Limited	
Sd/-		Sd/-	
Partner		Sd/-	
Shashank Doshi		Sd/-	
Membership No. 108456		Bindes Kurrani	
Place: Mumbai		Director	
Dated : 30th June 2021		Surbhi Aggarwal	
		Director	

STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED MARCH 31 2021

	Note No.	Current Reporting Period	Current Reporting Period
		March	March
		2021	2020
REVENUE :			
Revenue from Operations	9	8,940,950	3,250,000
Other Income		-	
Total Revenue		8,940,950	3,250,000
EXPENSES :			
Cost of Raw Materials Consumed			
Purchases of Stock-in-Trade		6,650,000	1,979,000
Changes in Inventories of Finished goods, Work-in-progress & Stock-in-Trade			
Employee Benefits Expense	10	933,890	-
Finance Costs			
Depreciation and Amortisation expense			
Other Expenses	11	37,346,803	1,241,020
Total Expenses		44,930,693	3,220,020
Profit / [Loss] before exceptional & extraordinary items & Tax		(35,989,743)	29,980
Less : Exceptional Items			
Profit / [Loss] before extraordinary items and Tax		(35,989,743)	32,000
Less : Extraordinary Items			
Profit / [Loss] before Tax		(35,989,743)	32,000
Less / [Add] : Tax Expense			
Current Tax		-	
Deferred Tax			
MAT Credit Entitlement		-	
Prior year's tax adjustments			
		(35,989,743)	32,000
Profit / [Loss] for the period from continuing operations		(35,989,743)	32,000
Balance Brought Forward		-	
Profit / [Loss] for the period		(35,989,743)	32,000
Earning per Equity Share [EPS] [in Rupees]			
Basic	12	(14.80)	0

As per our report of even date

For DGMS & Co

Chartered Accountants

Sd/-

Partner

Shahsank Doshi

Membership No. 108456

Place: Mumbai

Dated : 30th September 2021

For And On behalf of the Board Of Directors

Sd/-

Bindes Kurrani

Director

Sd/-

Surbhi Aggarwal

Director

Notes to the Financial Statements

	INR	INR
	As at end of	As at end of
	Current Reporting Period	Current Reporting Period
	March 31,	March 31,
	2021	2020

Note : 2 - Share Capital :

Authorised :		
2431500 [as at 31-03-21 :10000] Equity Shares of Rs.10/- each	24,315,000	24,315,000
	24,315,000	24,315,000
Issued, Subscribed and Fully Paid-up Equity Shares :		
2431500 [as at 31-03-21 :10000] Equity Shares of Rs.10/- each	24,315,000	24,315,000
	24,315,000	24,315,000

A. The reconciliation of the Shares outstanding as at March 31,2021

TYPE OF SHARE :	As at march 31, 2021		As at march 31, 2020	
	No of shares	Amount	No of shares	Amount
Balance as at the beginning of the year	2,431,500	24,315,000	2,431,500	24,315,000
ADD / LESS:	-	-	-	-
Outstanding at the end of the period	2,431,500	24,315,000	2,431,500	24,315,000

Note : 3 - Reserve and Surplus :

	2021	2020
Surplus :		
Balance as per last Balance Sheet	15,093,802	15,061,802
Add : Profit / (loss) for the period	(35,989,743)	32,000
Add : Adjustments related to earlier years	28,000	
Balance as at year end	(20,867,941)	15,093,802
Note : 4 - Trade Payable	2021	2020
AVICHAL		14,384,500
		14,384,500

		-
Total		-

Note : 5 - Short Term Provisions :

	2021	2020
Others :		
Other Ec		-
Audit exp payable	200,000	130,000
Provision for Income Tax (net)		-
Total	200,000	130,000

Note :6 Investments

	2021	2020
Aumento Construction		34,920,000
Malwa Cotton Spinning Mill		689,160
Mukerian Papers Ltd		1,056,415
VS Growth Fund		210,000
		-
Total		36,875,575

Note : 7 - Trade Receivable

	2021	2020
Cherished Traders		16,953,727
STOCK Broker	2,290,950	
Total	2,290,950	16,953,727

Note : 8 - Cash and Bank	2021	2020
Cash	1,311,070	65,000
Bank	45,039	29,000
Total	1,356,109	94,000

Note : 9- Revenue from Operations :	2021	2020
Operating Revenue	8,940,950	147,708
Others	-	193,201
Revenue from operations	8,940,950	340,909

Note :10 - Employee Benefit Expense :	2021	2020
Salaries, wages and bonus	933,890	
Staff welfare expenses		
Total	933,890	-

Total		

Note : 11 - Other Expenses :	2021	2020
Rate and charges	28,000	37,960
Misc Expense	61,508	18,000
Audit Fees	200,000	18,500
Accounting Fees	25,000	6,500
Bank Charges	863	8,300
Compliance Fees	-	12,000
Conveyance Fees	-	6,000
Professional Fees	-	565,000
Salary	-	45,000
Sundry Expense	-	19,800
Travelling	5,000	51,500
Listing		418,900
RTA Expense		31,540
Advertisement Expense	168,588	
AGM Expense	36,150	
Balance w/o	657,227	
Annual Fees	300,000	
CDSL	22,500	
Electricity Expense	7,500	
E Voting	5,900	
Impairment AS PER Ind AS	33,619,000	
Internet	15,222	
Rent	106,000	
Professional Fees	43,950	
Roc Fees	3,000	
Repair and Maintenance	6,500	
RTA Expense	50,320	
Secterial Expense	10,000	
Scrutniser Fees	10,000	
Telephone Exp	9,000	
Investment W/o	1,955,575	
Total	37,346,803	1,241,020

A Audit fees

a Auditors' Remuneration [Including Service Tax] :		
i Audit Fees	200,000	25,000
ii Tax Audit Fees		
iii Certification & Other Charges		
iv Total	200,000	25,000

Note : 12 - Calculation of Earnings per Equity Share [EPS] :

The numerators and denominators used to calculate the basic and diluted EPS are as follows :		
A Profit after tax attributable to Shareholders	-35989742.58	32,000
B Basic and weighted average number of Equity shares outstanding durii	2431500	2,431,500
C Nominal value of equity share	10	10
D Basic EPS	-14.80	0.01

Cash Flow Statement		(Rs. In Laacs)	
Particulars	Year Ended	Year Ended	
	31-03-2021	31-03-2020	
A. Cash Flow From Operating Activities			
Net Profit before taxation	0.00	0.32	
Add: Depreciation			
Add: Interest Expenses			
Add: Loss on sale of Fixed Asset			
Less :Interest on income			
Operating Profit before working Capital	0.00	0.32	
Changes			
Adjustment for:			
Non Current Financial Assets	0.00	368.76	
Other Non Current Assets	-	-	
Inventories	-	-	
Trade receivable	0.00	250.07	
Other Current Assets	0	3.67	
Loans and Advances	-	-	
Trade payable and other Liabilities	0.28	-222.54	
Short Term Provisions	0	-5.83	
Other Current liabilities	-	-	
Net Cash inflow from/(outflow) from operating activities	0.28	394.45	
B. Cash flow from Investing Activities			
Sale Proceeds from fixed Assets	-	-	
Interest received	-	-	
Fixed Assets Purchase	-	-	
Income tax	-	-	
Net Cash inflow from/(outflow) from Investing Activities	-	-	
C. Cash flow from Financing Activities			
Proceeds from Borrowing	-	-	
Interest paid	-	-	
Dividend Paid	-	-	
Net Cash inflow from/(outflow) from Financing Activities	-	-	
Net Increase /(decrease) in cash and Cash Equivalents	0.28	394.45	
Opening cash and Cash Equivalents			
Cash in Hand	0.65	0.67	
Bank balances	0.29	0.31	
Total	0.94	0.98	
Closing cash and Cash Equivalents			
Cash in hand	13.11	0.65	
Bank balances	0.45	0.29	
Total	13.56	0.94	



BOOK POST

To,

If undelivered please return to:
Registered Office Address
Svarnim Trade Udyog Limited
3-A, Surana House, 1st Floor,
Mangoe Lane, Kolkata-700001