

NOTICE

Notice is hereby given that the 28th Annual General Meeting of the members of ATUL AGRO PRIVATE LIMITED CIN- U74899DL1990PTC039889 will be held on Monday 30th September, 2019 at 01:00 P.M. at the registered office of the company at 77, GROUND FLOOR, DIPNI APPARTMENT, PITUMPURA, DELHI, DELHI-110034 to transact the following business:

To consider and adopt the Balance Sheet as on 31st March 2019 and the reports of Directors and Auditors thereon.

SPECIAL BUSINESS:

1. To approve the appointment of Mr. Paramjeet Singh Khamba as the Director of the company who was appointed as the additional Director of the company.

NOTES:

1. A member entitled to attend and vote at the meeting is entitled to appoint a proxy to attend and vote instead of himself and the proxy need not be the member of the company.
2. The proxies in order to be effective must be deposited at the registered office of the company not less than 48 hours before the commencement of the meeting.
3. Any member requiring information about the accounts etc. should inform the registered office of the company at least 7 days before the date of meeting so as to enable the management to keep the information.
4. Members are required to notify immediately the change if any, in their registered address.

BY ORDER OF THE BOARD OF
DIRECTORS



VIVEK KESARWANI
DIRECTOR
(DIN : 00137920)
ND-69, Pitampura
Delhi-110034

Place : DELHI
Date : 15/05/2019

EXPLANATORY STATEMENT

[EXPLANATORY STATEMENT IN PURSUANT TO THE PROVISION OF SECTION 102 OF
THE COMPANIES ACT, 2013]

SPECIAL BUSINESS:

Item No.2:

Mr. Paramjeet Singh Khamba was appointed as an Additional Director of the company under the provisions of Section 161 of the Companies Act, 2013 and will holds office upto the date of ensuing this Annual General Meeting. Mr. Paramjeet Singh Khamba is eligible for re-appointment and as such offers himself under the provisions of Section 160 of the Companies Act, 2013, for being re-appointed as a director.

Director's Report

To,
The Members of
ATUL AGRO PRIVATE LIMITED

Your Directors have pleasure in presenting the 28th Director's Report of your Company together with the Audited Statement of Accounts and the Auditors' Report of your company for the financial year ended, 31st March, 2019.

FINANCIAL HIGHLIGHTS

Particulars	Current year	Previous Year
Revenue from operations	0.00	0.00
Other Income	917400.00	726750.00
Total Income	917400.00	726750.00
Depreciation	3085.00	8885.00
Tax		
Current Tax	800.00	2900.00
Deferred Tax	16484.00	4651.00
Profit/(Loss) after Tax	-13228.00	7490.00
Earnings per share (Rs.) :		
Basic	-12.91	7.31
Diluted	0.00	0.00

STATE OF COMPANY'S AFFAIRS

During the year under review, the total Income of the Company was Rs. 917400.00 against Rs. 726750.00 in the previous year which shows the increase in revenue by 26 %. During the period, The Company has incurred loss after tax of Rs -13228.00 compared to profit of Rs. 7490.00 in the previous year.

TRANSFER TO RESERVES IN TERMS OF SECTION 134 (3) (J) OF THE COMPANIES ACT, 2013

For the financial year ended 31st March, 2019, the Company is not proposed to carry any amount to General Reserve Account.

DIVIDEND

Your Directors do not recommend any dividend for the year ended 31st March, 2019.

MATERIAL CHANGES AND COMMITMENTS, IF ANY, CRITERIA SPECIFY

There was no material changes and no commitment made by the directors affecting financial position of the company. So no criteria need to be specified for the year.

DETAILS OF SUBSIDIARY/JOINT VENTURES/ASSOCIATE COMPANIES -

As on March 31, 2019, the Company does not have any subsidiary/joint venture/associate companies.

CHANGE IN THE NATURE OF BUSINESS

There is no change in the nature of the business of the company.

ANNUAL RETURN

The Extract of Annual Return as required under section 92(3) of the Companies Act, 2013 in Form MGT-9 is annexed herewith for your kind perusal and information. (Annexure: 1)

MEETINGS OF THE BOARD OF DIRECTORS

The following Meetings of the Board of Directors were held during the Financial Year 2019:

SN	Date of Meeting	Board Strength	No. of Directors Present
1	15/05/2018	2	2
2	11/07/2018	2	2
3	25/09/2018	2	2
4	14/12/2018	2	2
5	24/12/2018	2	2
6	30/03/2019	2	2

PRESENCE/ATTENDANCE OF DIRECTORS IN THE MEETINGS

SN	Name of Director	Board Meeting			Committee Meeting			AGM
		No of Meeting held	No of Meeting attended	%	No of Meeting held	No of Meeting attended	%	
1	VIVEK KESARWANI	6	6	100	0	0	0	1
2	PARAMJEET SINGH KHAMBA	6	6	100	0	0	0	1

DIRECTORS' RESPONSIBILITY STATEMENT

Pursuant to Section 134(5) of the Companies Act, 2013 the Board of Directors of the Company confirms that-

- In the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures;
- The directors had 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;
- The directors had 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;
- The directors had prepared the annual accounts on a going concern basis; and
- The directors, in the case of a listed company, had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively.
- The directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

APPOINTMENT OF INDEPENDENT DIRECTORS IN THE BOARD AND DECLARATION UNDER SECTION 149(6)

The provisions of Section 149 pertaining to the appointment of Independent Directors do not apply to our Company.

STATUTORY AUDITOR AND AUDITORS' REPORT

M/s. Pratap Vikram and Associates, Chartered Accountants (FRN No. 018387n) were appointed as Statutory auditors of the company at Annual General Meeting held in 2015 and will hold office till the conclusion of the Annual General Meeting to be held in the calendar year 2020.

Company has received certificate from the Auditors to the effect they are not disqualified to continue as statutory auditors under the provisions of applicable laws.

There are no observations (including any qualification, reservation, adverse remark or disclaimer) of the Auditors in their Audit Report that may call for any explanation from the Directors. Further, the notes to accounts referred to in the Auditor's Report are self-explanatory.

SECRETARIAL AUDITOR AND SECRETARIAL AUDIT REPORT

The Secretarial Audit is not applicable on the company as it is not covered under the provisions of Section 204 of the Companies Act, 2013 and The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

VIGIL MECHANISM / WHISTLE BLOWER POLICY

The Company is not required to form such policy.

CORPORATE SOCIAL RESPONSIBILITY (CSR)

The company does not meet the criteria of Section 135 of Companies Act, 2013 read with the Companies (Corporate Social Responsibility Policy) Rules, 2014 so there is no requirement to constitution of Corporate Social Responsibility Committee.

NOMINATION AND REMUNERATION COMMITTEE

During the year 2018-19, Section 178 of the Companies Act 2013 for constitution of Nomination and remuneration committee was not applicable on the Company.

LOANS, GUARANTEES AND INVESTMENTS

The Company has not made / given / advanced any Loan, Guarantee and Investment during the financial year covered under section 186 of the Companies Act, 2013.

RELATED PARTY TRANSACTIONS

The Company is required to enter into various Related Parties Transactions as defined under Section 188 of the Companies Act, 2013 with related parties as defined under Section 2 (76) of the said Act. Further all the necessary details of transaction entered with the related parties are attached herewith in form no. AOC-2 for your kind perusal and information. (Annexure: 2).

CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION & FOREIGN EXCHANGE EARNINGS AND OUTGO

Information on conservation of Energy, Technology absorption, Foreign Exchange earnings and outgo required to be disclosed under Section 134 of the Companies Act, 2013 read with Companies (Accounts) Rules, 2014 are provided hereunder:

PARTICULARS	REMARKS
A) CONSERVATION OF ENERGY:	
> the steps taken or impact on conservation of energy;	The Corporation is taking due care for using electricity in the office. The Corporation usually takes care for optimum utilization of energy. No capital investment on energy Conservation equipment made during the financial year.
> the steps taken by the company for utilizing alternate sources of energy;	
> the capital investment on energy conservation equipments;	
B) TECHNOLOGY ABSORPTION:	
> the efforts made towards technology absorption;	The Company has not absorbed any technology from any source.
> the benefits derived like product improvement, cost reduction, product development or import substitution;	N.A.

> in case of imported technology (imported during the last three years reckoned from the beginning of the financial year)-	N.A.
(a) the details of technology imported;	
(b) the year of import;	
(c) whether the technology been fully absorbed;	
(d) if not fully absorbed, areas where absorption has not taken place, and the reasons thereof, Not applicable since 5 years period is over	
> the expenditure incurred on Research and Development	N.A.
(c) FOREIGN EXCHANGE EARNINGS AND OUTGO:	
> The Foreign Exchange earned in terms of actual inflows during the year and the Foreign Exchange outgo during the year in terms of actual outflows	N.A.

RISK MANAGEMENT

The Company has in place a mechanism to identify, assess, monitor and mitigate various risks in achieving key objectives of the Company. The Company has developed and implemented Risk Management Policy of the Company to identify, evaluate business risks and opportunities. This framework seeks to create transparency, minimize adverse impact on the business objectives and enhance the Company's competitive advantage.

INTERNAL FINANCE CONTROL ADEQUACY

The Companies Act, 2013 re-emphasizes the need for an effective Internal Financial Control system in the Company. The system should be designed and operated effectively. Rule 8(5) (viii) of Companies (Accounts) Rules, 2014 requires the information regarding adequacy of Internal Financial Controls with reference to the financial statements to be disclosed in the Board's report. To ensure effective Internal Financial Controls the Company has laid down the following measures:

1. The internal financial control systems are commensurate with the size and nature of its operations.
2. All legal and statutory compliances are ensured on a monthly basis. Non-compliance, if any, is seriously taken by the management and corrective actions are taken immediately. Any amendment is regularly updated by internal as well as external agencies in the system.
3. Approval of all transactions is ensured through a preapproved Delegation of Authority Schedule which is reviewed periodically by the management.
4. The Company follows a robust internal audit process. Transaction audits are conducted regularly to ensure accuracy of financial reporting, safeguard and protection of all the assets. Fixed Asset verification of assets is done on an annual basis. The audit reports for the above audits are compiled and submitted to Board of Directors for review and necessary action.

GENERAL

Your Directors state that no disclosure or reporting is required in respect of the following items as there were no transactions on these items during the year under review:

1. Details relating to deposits covered under Chapter V of the Act.
2. Issue of equity shares with differential rights as to dividend, voting or otherwise.
3. Issue of shares (including sweat equity shares) to employees of the Company under any scheme save and except ESOS referred to in this Report.
4. Neither the Managing Director nor the Whole-time Directors of the Company receive any remuneration or commission from any of its subsidiaries.

5. No significant or material orders were passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future.

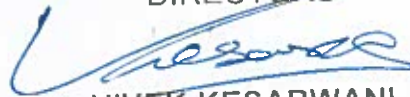
Your director's further state that during the year under review, there were no cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

ACKNOWLEDGEMENT

Your Company has maintained healthy, cordial and harmonious industrial relations at all levels. The enthusiasm and unstinted efforts of the employees have enabled your Company to remain at the forefront of the industry. The Directors place on record their sincere appreciation for significant contributions made by the employees through their dedication, hard work and commitment towards the success and growth of the Company. Your Directors take this opportunity to place on record their sense of gratitude for the Banks, Financial Institutions, Central and State Government Departments, their Local Authorities and other agencies working with the Company for their guidance and support.

Your Board of Directors wishes to express its gratitude and record its sincere appreciation for the commitment and dedicated efforts put in by all the employees. Your Directors take this opportunity to express their grateful appreciation for the encouragement, co-operation and support received by the Company from the local authorities, bankers, customers, suppliers and business associates. The directors are thankful to the esteemed shareholders for their continued support and the confidence reposed in the Company and its management.

BY ORDER OF THE BOARD OF
DIRECTORS



VIVEK KESARWANI

DIRECTOR

(DIN : 00137920)

ND-69, Pitampura

Delhi-110034

Place : DELHI

Date : 15/05/2019

Annexure: 1

Form No. MGT-9

EXTRACT OF ANNUAL RETURN
as on the financial year ended on 31/03/2019

[Pursuant to section 92(3) of the Companies Act, 2013 and rule 12(1) of the
Companies (Management and Administration) Rules, 2014]

I. REGISTRATION AND OTHER DETAILS:

i)	CIN:	U74899DL1990PTC039889	
	Registration Date [DDMMYY]	18/04/1990	
ii)	Category of the Company [Pl. tick]	1. Public Company 2. Private Company <input checked="" type="checkbox"/>	
iii)	Sub Category of the Company [Please tick whichever are applicable]	1. Government Company	
		2. Small Company	
		3. One Person Company	
		4. Subsidiary of Foreign Company	
		5. NBFC	
		6. Guarantee Company	
		7. Limited by shares	<input checked="" type="checkbox"/>
		8. Unlimited Company	
		9. Company having share capital	
		10. Company not having share capital	
		11. Company Registered under Section 8	
v)	Name of the company	ATUL AGRO PRIVATE LIMITED	
vi)	NAME AND REGISTERED OFFICE ADDRESS OF COMPANY:		
	Company Name	ATUL AGRO PRIVATE LIMITED	
	Address	77 GROUND FLOOR, DIPNI APARTMENT	
	Town / City	PITAMPURA	
	State	DELHI	
	Pin Code:	110034	
	Country Name :	INDIA	
	Email Address	chaturvedi@steragro.com	
vii)	Whether listed company	NO	

vii) Name, Address and Contact details of Registrar and Transfer Agent, if any : NO

g) FIIs -	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
h) Foreign Venture Capital Funds	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
i) Others (specify)	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Sub-total (B)(1):-	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
2. Non- Institutions									
a) Bodies Corp.	NIL	5	5	0.50%	NIL	5	5	0.50%	NIL
i) Indian	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
ii) Overseas	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
b) Individuals	NIL	15	15	1.50%	NIL	15	15	1.50%	NIL
i) Individual shareholders holding nominal share capital upto Rs. 1 lakh	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
ii) Individual shareholders holding nominal share capital in excess of Rs 1 lakh	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
c) Others (specify)	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Non Resident Indians	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Overseas Corporate Bodies	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Foreign Nationals	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Clearing Members	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Trusts	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Foreign Bodies - DR	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Sub-total (B)(2):-	NIL	20	20	2.00%	NIL	20	20	2.00%	NIL
Total Public Shareholding (B)=(B)(1)+ (B)(2)	NIL	20	20	2.00%	NIL	20	20	2.00%	NIL
C. Shares held by Custodian for GDRs & ADRs	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL	NIL
Grand Total (A+B+C)	NIL	1025	1025	100%	NIL	1025	1025	100%	NIL

(ii) Shareholding of Promoters

SN	Shareholder's Name	Shareholding at the beginning of the year			Share holding at the end of the year			% change in share holding during the year
		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	
1	ACME RESOURCES LTD	985	96%	NIL	985	96%	NIL	NIL
2	RAVIN SALUJA	10	1%	NIL	10	1%	NIL	NIL
3	VIVEK KESARWANI	10	1%	NIL	10	1%	NIL	NIL
	Total	1005	98%	NIL	1005	98%	NIL	NIL

(iii) Change in Promoters' Shareholding (please specify, if there is no change)

SN		Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	1005	98%	1005	98%
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus/ sweat equity etc):	NIL	NIL	NIL	NIL
	At the end of the year	1005	98%	1005	98%

(iv) Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):

SN	For Each of the Top 10 Shareholders	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	20	2.00%	20	2.00%
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus/ sweat equity etc):	NIL	NIL	NIL	NIL
	At the end of the year	20	2.00%	20	2.00%

(v) Shareholding of Directors and Key Managerial Personnel:

SN	Shareholding of each Directors and each Key Managerial Personnel	Shareholding at the beginning of the year		Cumulative Shareholding during the Year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
	At the beginning of the year	10	1%	10	1%
	Date wise Increase / Decrease in Promoters Share holding during the year specifying the reasons for increase / decrease (e.g. allotment / transfer / bonus/ sweat equity etc):	NIL	NIL	NIL	NIL
	At the end of the year	10	1%	10	1%

VI. INDEBTEDNESS

Indebtedness of the Company including interest outstanding/accrued but not due for payment

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	NIL	5536075.00	NIL	5536075.00
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	NIL	NIL	NIL
Total (i+ii+iii)	NIL	5536075.00	NIL	5536075.00
Change in Indebtedness during the financial year				
* Addition	NIL	57517.00	NIL	57517.00
* Reduction	NIL	43592.00	NIL	43592.00
Net Change	NIL	13925.00	NIL	13925.00
Indebtedness at the end of the financial year				
i) Principal Amount	NIL	5550000.00	NIL	5550000.00
ii) Interest due but not paid	NIL	NIL	NIL	NIL
iii) Interest accrued but not due	NIL	653687.00	NIL	653687.00
Total (i+ii+iii)	NIL	6203687.00	NIL	6203687.00

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager				Total Amount
		----	----	----	----	
1	Gross salary	NIL	NIL	NIL	NIL	NIL
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NIL	NIL	NIL	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income- tax Act, 1961	NIL	NIL	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	NIL	NIL	NIL	NIL	NIL
2	Stock Option	NIL	NIL	NIL	NIL	NIL
3	Sweat Equity	NIL	NIL	NIL	NIL	NIL
4	Commission - as % of profit - others, specify...	NIL	NIL	NIL	NIL	NIL
5	Others, please specify	NIL	NIL	NIL	NIL	NIL
	Total (A)	NIL	NIL	NIL	NIL	NIL
	Ceiling as per the Act	NIL	NIL	NIL	NIL	NIL

B. Remuneration to other directors:

SN.	Particulars of Remuneration	Name of Directors				Total Amount
		----	----	----	----	
1	Independent Directors	NIL	NIL	NIL	NIL	NIL
	Fee for attending board committee meetings	NIL	NIL	NIL	NIL	NIL
	Commission	NIL	NIL	NIL	NIL	NIL
	Others, please specify	NIL	NIL	NIL	NIL	NIL
	Total (1)	NIL	NIL	NIL	NIL	NIL
2	Other Non-Executive Directors	NIL	NIL	NIL	NIL	NIL
	Fee for attending board committee meetings	NIL	NIL	NIL	NIL	NIL
	Commission	NIL	NIL	NIL	NIL	NIL
	Others, please specify	NIL	NIL	NIL	NIL	NIL
	Total (2)	NIL	NIL	NIL	NIL	NIL
	Total (B)=(1+2)	NIL	NIL	NIL	NIL	NIL
	Total Managerial Remuneration	NIL	NIL	NIL	NIL	NIL
	Overall Ceiling as per the Act	NIL	NIL	NIL	NIL	NIL

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

SN	Particulars of Remuneration	Key Managerial Personnel			
		CEO	CS	CFO	Total
1	Gross salary	NIL	NIL	NIL	NIL
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NIL	NIL	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	NIL	NIL	NIL	NIL
2	Stock Option	NIL	NIL	NIL	NIL
3	Sweat Equity	NIL	NIL	NIL	NIL
4	Commission	NIL	NIL	NIL	NIL
	- as % of profit	NIL	NIL	NIL	NIL
	others, specify...	NIL	NIL	NIL	NIL
5	Others, please specify	NIL	NIL	NIL	NIL
	Total	NIL	NIL	NIL	NIL

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL
B. DIRECTORS					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL
C. OTHER OFFICERS IN DEFAULT					
Penalty	NIL	NIL	NIL	NIL	NIL
Punishment	NIL	NIL	NIL	NIL	NIL
Compounding	NIL	NIL	NIL	NIL	NIL

For ATUL AGRO PRIVATE LIMITED


VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032



PARAMJEET SINGH
KHAMBA
(DIRECTOR)
(DIN : 05339940)
V-29 Vijaya Nagar
Gwalior-474011

Place : Delhi

Date : 15/05/2019

Annexure: 2

Form No. AOC-2

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014)

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arms length transactions under third proviso thereto

1. Details of contracts or arrangements or transactions not at arm's length basis : Nil

(a) Name(s) of the related party and nature of relationship : Nil

(b) Nature of contracts/arrangements/transactions : Nil

(c) Duration of the contracts / arrangements/transactions : Nil

(d) Salient terms of the contracts or arrangements or transactions including the value, if any Nil

(e) Justification for entering into such contracts or arrangements or transactions Nil

(f) date(s) of approval by the Board Nil

(g) Amount paid as advances, if any: Nil

(h) Date on which the special resolution was passed in general meeting as required under first proviso to section 188 Nil

2. Details of material contracts or arrangement or transactions at arm's length basis

(a) Name(s) of the related party and nature of relationship

S.no	Name	Relation
1.	ACME RESOURCES LTD	HOLDING COMPANY

(b) Nature of contracts/arrangements/transactions: Interest paid on loan taken.

(c) Duration of the contracts / arrangements/transactions: outstanding amount repayable on demand.

(d) Salient terms of the contracts or arrangements or transactions including the value, if any:

S.no	Name	Particulars/ Amount	
		1.	ACME RESOURCES LTD
		Loan taken	57517 00
		Loan repaid	43592 00
		Closing balance	5550000 00
		Interest paid	726319 00

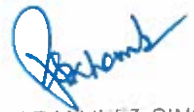
(e) Date(s) of approval by the Board, if any:

(f) Amount paid as advances, if any: Nil.

For ATUL AGRO PRIVATE LIMITED


VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032



PARAMJEET SINGH
KHAMBA
(DIRECTOR)
(DIN 05339940)
V 29, Vijaya Nagar
Gwalior-474011

Place : Delhi

Date : 15/05/2019

INDEPENDENT AUDITOR'S REPORT

TO THE MEMBERS OF
ATUL AGRO PRIVATE LIMITED

I. Report on the Audit of the Standalone Financial Statements

1. Opinion

- A. We have audited the accompanying Standalone Financial Statements of ATUL AGRO PRIVATE LIMITED ("the Company"), which comprise the Balance Sheet as at March 31, 2019, the Statement of Profit and Loss, the Statement of Changes in Equity for the year ended on that date, and a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the Standalone Financial Statements").
- B. In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Standalone Financial Statements give the information required by the Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under section 133 of the Act and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2019, the profit and total comprehensive income, changes in equity and its cash flows for the year ended on that date

2. Basis for Opinion

We conducted our audit of the Standalone Financial Statements in accordance with the Standards on Auditing specified under section 143(10) of the Act (SAs). Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Standalone Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India (ICAI) together with the independence requirements that are relevant to our audit of the financial statements under the provisions of the Act and the Rules made thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Standalone Financial Statements.

3. Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the Standalone Financial Statements of the current period. These matters were addressed in the context of our audit of the Standalone Financial Statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined the matters described below to be the key audit matters to be communicated in our report.



4. Information Other than the Standalone Financial Statements and Auditor's Report Thereon

- A. The Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the Standalone Financial Statements and our auditor's report thereon. Our opinion on the standalone financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.
- B. In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the standalone Financial Statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

5. Management's Responsibility for the Standalone Financial Statements

- A. The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these Standalone Financial Statements that give a true and fair view of the financial position, financial performance, changes in equity of the Company in accordance with the accounting principles generally accepted in India. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding 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 standalone financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.
- B. In preparing the Standalone Financial Statements, management 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 management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

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

6. Auditor's Responsibilities for the Audit of the Standalone Financial Statements

- A. Our objectives are to obtain reasonable assurance about whether the Standalone Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Standalone Financial Statements.



PRATAP VIKRAM & ASSOCIATES

CHARTERED ACCOUNTANTS

- B. As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:
- i) Identify and assess the risks of material misstatement of the standalone financial statements, 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.
 - ii) Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control systems.
 - iii) Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management
 - iv) Conclude on the appropriateness of 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 Standalone Financial Statements 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
 - v) Evaluate the overall presentation, structure and content of the Standalone Financial Statements, including the disclosures, and whether the Standalone Financial Statements represent the underlying transactions and events in a manner that achieves fair presentation
- C. Materiality is the magnitude of misstatements in the Standalone Financial Statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the Standalone Financial Statements may be influenced. We consider quantitative materiality and qualitative factors in
- i) planning the scope of our audit work and in evaluating the results of our work; and
 - ii) to evaluate the effect of any identified misstatements in the Standalone Financial Statements.
- D. 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



- E. 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.
- F. From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Standalone Financial Statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

I. Report on Other Legal and Regulatory Requirements

As required by Section 143(3) of the Act, based on our audit we report that:

- A. We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit.
- B. In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
- C. The Balance Sheet, the Statement of Profit and Loss, Statement of Changes in Equity dealt with by this Report are in agreement with the relevant books of account.
- D. In our opinion, the aforesaid standalone financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014.
- E. On the basis of the written representations received from the directors as on March 31, 2019 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2019 from being appointed as a director in terms of Section 164 (2) of the Act.
- F. With respect to the adequacy of the internal financial controls with reference to financial statements of the Company and the operating effectiveness of such controls, are not applicable to the Company.
- G. With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended, no Remuneration has been provided to directors during the year.
- H. With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us:



PRATAP VIKRAM & ASSOCIATES

CHARTERED ACCOUNTANTS

- i.) The Company does not have any pending litigations on its financial position in its financial statements
- ii) The Company did not have any long-term contracts including derivatives contracts for which there were any material foreseeable losses;
- iii) There were no amounts which required to be transferred to the Investor Education and Protection Fund by the Company.

As required by the Companies (Auditor's Report) Order, 2016 ("the Order"), issued by the Central Government of India in terms of sub-section (11) of Section 143 of the Act, we give in the Annexure-A a statement on the matters specified in the paragraph 3 and 4 of the order to the extent applicable.

for PRATAP VIKRAM AND ASSOCIATES

Chartered Accountants

Frn. 018387n



VIKRAM KESARWANI

Partner

M.no 500354

Place : DELHI

Date : 15/05/2019

ANNEXURE-A TO THE AUDITORS' REPORT

The Annexure referred to in our report to the members of ATUL AGRO PRIVATE LIMITED for the year ended 31st March, 2019.

On the basis of the information and explanation given to us during the course of our audit, we report that:

1. (a) The company has maintained proper records showing full particulars including quantitative details and situation of its fixed assets.
(b) These fixed assets have been physically verified by the management at reasonable intervals there was no Material discrepancies were noticed on such verification.
2. As explained to us, company does not hold any Inventories.
3. According to the information and explanations given to us and on the basis of our examination of the books of account. The company has not granted loans secured or unsecured to companies, firms, or other parties covered in the register maintained under section 189 of the Companies Act, 2013.
4. In respect of loans, investments, guarantees, and security all mandatory provisions of section 185 and 186 of the Companies Act, 2013 have been complied with.
5. The company has not accepted any deposits.
6. Maintenance of cost records has not been specified by the Central Government under sub-section (1) of section 148 of the Companies Act, 2013.
7. (a) The company is regular in depositing undisputed statutory dues including provident fund, Employee's state insurance, income-tax, gst, duty of customs, duty of excise, cess and any other statutory dues to the appropriate authorities.
(b) Dues of income tax or gst or duty of customs or duty of excise or have been deposited on time there is no dispute is pending on the part of company.
8. The company hasn't made any default in repayment of loans or borrowing to a financial institution, bank, Government or dues to debenture holders.
9. The company doesn't raise any money by way of initial public offer or further public offer (including debt instruments)
10. Neither company has done any fraud nor by its officers or employees so nothing to be disclosed separately.
11. No Managerial remuneration has been paid or provided in the books of accounts
12. Company is not a Nidhi Company hence nothing to be disclosed for any provisions applicable on Nidhi Company.



PRATAP VIKRAM & ASSOCIATES

CHARTERED ACCOUNTANTS

13. All transactions with the related parties are in compliance with sections 177 and 188 of Companies Act, 2013 where applicable and the details have been disclosed in the Financial Statements etc. as required by the applicable accounting standards;
14. The company hasn't made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year.
15. The company hasn't entered into any non-cash transactions with directors or persons connected with him.
16. The company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

for PRATAP VIKRAM AND ASSOCIATES
Chartered Accountants
Fnn. 018387n

Place : DELHI
Date : 15/05/2019


VIKRAM KESARWANI
Partner
M.no 500354



Cash and cash equivalents at beginning of period	1358072.61	735806.61
Cash and cash equivalents at end of period	681674.61	1358072.61

In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN: 018387N

For ATUL AGRO PRIVATE LIMITED


VIKRAM KESARWANI
(PARTNER)
M.NO 500354
212-213 RAJINDRA JAINA TOWER-1
WAZIRPUR COMMERCIAL COMPLEX
DELHI-110052




VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032


PARAMJEET SINGH
KHAMBA
(DIRECTOR)
(DIN : 05339940)
V-29, Vijaya Nagar
Gwalior-474011

Place : DELHI

Date : 15/05/2019


ATUL AGRO PRIVATE LIMITED
CIN : U74899DL1990PTC039889
BALANCE SHEET AS AT 31/03/2019

In ₹

Particulars	Note	31/03/2019	31/03/2018
EQUITY AND LIABILITIES			
Shareholders' funds			
Share capital	1	102500.00	102500.00
Reserves and surplus	2	430843.61	444071.61
Money received against share warrants		533343.61	546571.61
Share application money pending allotment		-	-
Non-current liabilities			
Long-term borrowings	3	5550000.00	5536075.00
Deferred tax liabilities (Net)		-	-
Other Long term liabilities		-	-
Long-term provisions		5550000.00	5536075.00
Current liabilities			
Short term borrowings	4	191561.00	172361.00
Trade payables	5	72632.00	786988.00
Other current liabilities	6	800.00	2900.00
Short-term provisions		264993.00	962249.00
TOTAL		6348336.61	7044895.61
ASSETS			
Non-current assets			
Property, Plant and Equipment	7	5585797.00	5588882.00
Tangible assets		-	-
Intangible assets		-	-
Capital work-in-progress		-	-
Intangible assets under development		5585797.00	5588882.00
Non current investments	8	80865.00	97349.00
Deferred tax assets (net)		-	-
Long term loans and advances		-	-
Other non-current assets		5666662.00	5686231.00
Current assets			
Current investments		-	-
Inventories		-	-
Trade receivables	9	681674.61	1358072.61
Cash and cash equivalents		-	-
Short term loans and advances	10	-	592.00
Other current assets		681674.61	1358664.61
TOTAL		6348336.61	7044895.61


In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN : 018387N

For ATUL AGRO PRIVATE LIMITED


VIKRAM KESARWANI
(PARTNER)
M NO 500354
212-213 RAJINDRA JAINA TOWER-1
WAZIRPUR COMMERCIAL COMPLEX
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Delhi-110032


**PARAMJEET SINGH
KHAMBA**
(DIRECTOR)
(DIN : 05339940)
V-29, Vijaya Nagar
Gwalior-474011

Place : DELHI

Date : 15/05/2019

NOTES ON ACCOUNTS FOR THE YEAR ENDED MARCH 31, 2019

1 Share Capital

In ₹

Particulars	31/03/2019	31/03/2018
Authorised		
5000 (5000) Equity Shares of ₹ 100/- Par Value	500000.00	500000.00
	500000.00	500000.00
Issued		
1025 (1025) Equity Shares of ₹ 100/- Par Value	102500.00	102500.00
	102500.00	102500.00
Subscribed		
1025 (1025) Equity Shares of ₹ 100/- Par Value	102500.00	102500.00
	102500.00	102500.00
Paidup		
1025 (1025) Equity Shares of ₹ 100/- Par Value Fully Paidup	102500.00	102500.00
	102500.00	102500.00

Share Held by Holding Co.

Particulars	31/03/2019	31/03/2018
ACME RESOURCES LTD	985	985
	985	985

Details Of Shares For Preceding Five Years

Particulars	31/03/2019	31/03/2018	31/03/2017	31/03/2016	31/03/2015
Number Of Equity Shares Bought Back	0	0	0	0	C
Number Of Preference Shares Redeemed	0	0	0	0	C
Number of Equity Share Issue as Bonus Share	0	0	0	0	C
Number of Preference Share Issue as Bonus Share	0	0	0	0	C
Number of Equity Shares Allotted For Contracts Without Payment Received In Cash	0	0	0	0	C
Number of Preference Shares Allotted For Contracts Without Payment Received In Cash	0	0	0	0	C

Reconciliation

Particulars	31/03/2019		31/03/2018	
	Number of Share	Amount	Number of Share	Amount
Number of shares at the beginning	1025	102500.00	1025	102500.00
Add : Issue	0	0.00	0	0.00
Less : Bought Back	0	0.00	0	0.00
Others	0	0.00	0	0.00
Number of shares at the end	1025	102500.00	1025	102500.00

2 Reserve and Surplus

In ₹

Particulars	31/03/2019	31/03/2018
Securities Premium Opening	298000.00	298000.00
	298000.00	298000.00
Profit and Loss Opening	146071.61	138581.61
Amount Transferred From Statement of P&L	(13228.00)	7490.00
	132843.61	146071.61
	430843.61	444071.61

3 Long Term Borrowings

In ₹

Particulars	31/03/2019	31/03/2018
Others		
Unsecured		
Unsecured Loan From Corporate	5550000.00	5536075.00
	5550000.00	5536075.00

4 Trade Payables

In ₹

Particulars	31/03/2019	31/03/2018
Creditors Due others		
Sundry Creditors for Expenses	191561.00	172361.00
	191561.00	172361.00

5 Other Current Liabilities

In ₹

Particulars	31/03/2019	31/03/2018
Other payables		
Tax Payable		
TDS		
TDS PAYABLE (INTEREST)	72632.00	54647.00
Expenses Payable		
INTEREST PAYABLE	0.00	732341.00
	72632.00	786988.00

6 Short Term Provisions

In ₹

Particulars	31/03/2019	31/03/2018
Tax Provision		
Current Tax	800.00	2900.00
	800.00	2900.00

7 Tangible assets

In ₹

Particulars	Gross				Depreciation					Net	
	Opening	Additio n	Deducti on	Closing	Open ng	During Period	Deduc tion	Other Adj.	Closin g	Closing	Opening
Land											
LAND	5583699.00			5583699.00						5583699.00	5583699.00
Total	5583699.00			5583699.00						5583699.00	5583699.00
Equipments											
Computer Equipments											
COMPUTERS & PRINTERS	41950.00			41950.00	36767.00	3085.00			39852.00	2098.00	5183.00
Total	41950.00			41950.00	36767.00	3085.00			39852.00	2098.00	5183.00
Grand Total	5625649.00	0.00	0.00	5625649.00	36767.00	3085.00	0.00	0.00	39852.00	5585797.00	5588882.00
Previous	5625649.00	0.00	0.00	5625649.00	27882.00	8885.00	0.00	0.00	36767.00	5588882.00	5597767.00

8 Deferred Taxes

In ₹

Particulars	31/03/2019	31/03/2018
Deferred Tax Assets		
Unabsorbed Depreciation	554.00	576.00
Unrealised Carried Forward Losses	80311.00	96773.00
	80865.00	97349.00

9 Cash and cash equivalents

In ₹

Particulars	31/03/2019	31/03/2018
Cash in Hand	400746.23	1008346.23
Balances With Banks		
Balance With Scheduled Banks		
Current Account		
STATE BANK OF INDIA	14400.38	44671.38
HDFC BANK	108271.50	146031.50
STATE BANK OF INDIA (9993)	158256.50	159023.50
	681674.61	1358072.61

10 Other current assets

In ₹

Particulars	31/03/2019	31/03/2018
INTEREST RECEIVABLE	0.00	592.00
	0.00	592.00

In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN : 018387N



VIKRAM KESARWANI
(PARTNER) -
M NO 500354
212-213 RAJINDRA JAINA TOWER-1
WAZIRPUR COMMERCIAL COMPLEX
DELHI-110052

For ATUL AGRO PRIVATE LIMITED

VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032

PARAMJEET SINGH

KHAMBA

(DIRECTOR)

(DIN : 05339940)
V-29, Vijaya Nagar
Gwalior 474011

Place : DELHI

Date : 15/05/2019

ATUL AGRO PRIVATE LIMITED
CIN : U74899DL1990PTC039889
STATEMENT OF PROFIT AND LOSS FOR THE YEAR ENDED 31/03/2019

In ₹

Particulars	Note	31/03/2019	31/03/2018
Revenue from operations			-
Other income	11	917400 00	726750 00
Total Revenue		917400 00	726750 00
Expenses			
Cost of materials consumed		-	-
Purchases of Stock-in-Trade		-	-
Changes in inventories of finished goods work-in progress and Stock-in-Trade		-	-
Employee benefits expense	12	108000 00	96000 00
Finance costs	13	765908 00	548814 00
Depreciation and amortization expense	14	3085 00	8885 00
Other expenses	15	36381 00	58000 00
Total expenses		913374 00	711699 00
Profit before exceptional, extraordinary and prior period items and tax		4026 00	15051 00
Exceptional items		-	-
Profit before extraordinary and prior period items and tax		4026 00	15051 00
Extraordinary Items		-	-
Profit before prior period items and tax		4026 00	15051 00
Prior Period Items	16	30 00	(10 00)
Profit before tax		4056 00	15041 00
Tax expense	17	-	-
Current tax		800 00	2900 00
Deferred tax		16484 00	4651 00
Profit/(loss) for the period from continuing operations		(13228 00)	7490 00
Profit/(loss) from discontinuing operations		-	-
Tax expense of discontinuing operations		-	-
Profit/(loss) from Discontinuing operations (after tax)		-	-
Profit/(loss) for the period		(13228 00)	7490 00
Earnings per equity share:	18		
Basic		-12 90	7 31
Diluted		-	-


In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN : 018387N

For ATUL AGRO PRIVATE LIMITED

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Gwalior-474011

Place : DELHI

Date : 15/05/2019

NOTES ON ACCOUNTS FOR THE YEAR ENDED MARCH 31, 2019

11 Other income

In ₹

Particulars	31/03/2019	31/03/2018
Miscellaneous		
RENT RECEIVED	917400.00	726750.00
	917400.00	726750.00

12 Employee benefits expense

In ₹

Particulars	31/03/2019	31/03/2018
Salary, Wages & Bonus		
SALARY	108000.00	96000.00
	108000.00	96000.00

13 Finance costs

In ₹

Particulars	31/03/2019	31/03/2018
Interest Expenses		
Interest Expenses		
INTEREST ON LOAN	726319.00	546469.00
Bank Charges		
BANK INTEREST AND CHARGES	39589.00	2345.00
Finance Charges		
Other Finance Charges		
Interest on TDS	0.00	0.00
	765908.00	548814.00

14 Depreciation and amortisation expense

In ₹

Particulars	31/03/2019	31/03/2018
Depreciation & Amortisation		
Depreciation Tangible Assets	3085.00	8885.00
	3085.00	8885.00

15 Other expenses

In ₹

Particulars	31/03/2019	31/03/2018
Administrative and General Expenses		
Auditors Remuneration		
Audit Fees	35400.00	35400.00
Legal and Professional Charges	0.00	20200.00
Registration and Filing Fees		
ROC FEES	800.00	2400.00
SHORT & EXCESS	181.00	0.00
	36381.00	58000.00

16 Prior Period items

In ₹

Particulars	31/03/2019	31/03/2018
Prior Period Income	30.00	0.00
Prior Period Expenses	(0.00)	(10.00)
	30.00	(10.00)

17 Tax expense

In ₹

Particulars	31/03/2019	31/03/2018
Current tax	800.00	2900.00
Deferred tax	16484.00	4651.00
	17284.00	7551.00

18 Earnings per equity share

In ₹

Particulars	31/03/2019	31/03/2018
Earnings Per Equity Share		
Basic	-12.90	7.31
Number of Shares used in computing EPS		
Basic	1025	1025
Weighted Average Number of shares		
Number of Shares for basic EPS calculation	1025	1025

In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN : 018387N




VIKRAM KESARWANI
(PARTNER)
M NO 500354
212-213 RAJINDRA JAINA TOWER-1
WAZIRPUR COMMERCIAL COMPLEX
DELHI-110052

For ATUL AGRO PRIVATE LIMITED


VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
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Delhi-110032


PARAMJEET SINGH
KHAMBA
(DIRECTOR)
(DIN : 05339940)
V-29, Vijaya Nagar
Gwalior-474011

Place : DELHI

Date : 15/05/2019

ANNEXURE – I : STATEMENT OF SIGNIFICANT ACCOUNTING POLICIES AND PRACTICES
(Annexed to and forming part of the financial statements for the year ended 31-03-2019)

1. Significant Accounting Policies:

Basis of preparation:

The financial statements of the Company have been prepared in accordance with generally accepted accounting principles in India (Indian GAAP). These financial statements have been prepared to comply in all material respects with the Accounting Standards notified by Companies (Accounting Standards) Rules, 2006, (as amended) and the relevant provisions of the Companies Act, 1956/2013. The financial statements have been prepared under the historical cost convention on an accrual basis and going concern basis. The accounting policies have been consistently applied by the company are consistent with those used in the previous year.

2. Use of Estimates:

The preparation of financial statements in conformity with generally accepted accounting principles requires management to make estimates and assumptions that affect the reported amounts of assets and liabilities and disclosure of contingent liabilities at the date of the financial statements and the results of operations during the reporting period. Although these estimates are based upon management's best knowledge of current events and actions, actual results could differ from these estimates.

3. Tangible Fixed Assets:

- Fixed assets are stated at cost less accumulated depreciation and impairment losses if any. Cost comprises the purchase price and directly attributable cost of bringing the asset to its working condition for its intended use. Any trade discounts and rebates are deducted in arriving at the purchase price.
- Borrowing costs relating to acquisition of tangible assets which takes substantial period of time to get ready for its intended use are also included to the extent they relate to the period till such assets are ready to be put to use. Assets under installation or under construction as at the Balance Sheet date are shown as Capital Work in Progress.

4. Intangible Fixed Assets:

Intangible assets are recognized when it is probable that the future economic benefits that are attributable to the asset will flow to the enterprise and the cost of the asset can be measured reliably.

5. Impairment of Assets:

- The carrying amounts of assets are reviewed at each balance sheet date if there is any indication of impairment based on internal / external factors. An impairment loss is recognized wherever the carrying amount of an asset exceeds its recoverable amount. The recoverable amount is the greater of the asset's net selling price and value in use. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and risks specific to the asset. Net selling price is the amount obtainable from the sale of an asset in an arm's length transaction between knowledgeable, willing parties, less the costs of disposal.
- After impairment, depreciation is provided on the revised carrying amount of the asset over its remaining useful life.

6. Depreciation and Amortisation:

Depreciation on the fixed assets is provided under written down value method as per the rates prescribed in Schedule II to the Companies Act, 2013 or at rates permissible under applicable local laws so as to charge off the cost of assets to the Statement of Profit and Loss over their estimated useful life, except on the following categories of assets:

- (i) Leasehold land and leasehold improvements are amortised over the primary period of lease.
- (ii) Intangible assets are amortised over their useful life of 5 years.

7. Investments:

- Investments, which are readily realizable and intended to be held for not more than one year from the date on which such investments are made, are classified as current investments. All other investments are classified as long-term investments.
- On initial recognition, all investments are measured at cost. The cost comprises the purchase price and directly attributable acquisition charges such as brokerage, fees and duties. If an investment is acquired, or partly acquired by the issue of shares or the other securities, the acquisition cost is the fair value of securities issued. If an investment is acquired in exchange for another asset, the acquisition is determined by reference to the fair value of the asset given up or by reference to the fair value of the investment acquired, whichever is more clearly evident.
- Current investments are carried at the lower of cost and fair value determined on an individual investment basis. Long-term investments are carried at cost. However, provision for diminution in value is made to recognize a decline other than temporary in the value of the long term investments.
- On disposal of an investment, the difference between its carrying amount and net disposal proceeds is charged or credited to the statement of profit and loss.

8. Employee Benefits:

Employee benefits include provident fund, employee state insurance scheme, gratuity fund and Compensated absences.

9. Inventories:

Company does not hold any Inventories.

10. Borrowing Costs:

Borrowing costs directly attributable to the acquisition, construction or production of an asset that necessarily takes a substantial period of time to get ready for its intended use or sale are capitalized as part of the cost of the respective asset. All other borrowing costs are expensed in the period they occur. Borrowing costs consist of interest, exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost and other costs that an entity incurs in connection with the borrowing of funds.

11. Revenue Recognition:

Revenue from Operations

- Sale and operating income includes sale of products, services, profit from partnership firms, income from job work services, export incentives, etc.
- Sale of goods are recognised, net of returns and trade discounts, on transfer of significant risks and rewards of ownership to the buyer. Sales include excise duty but exclude sales tax and value added tax.
- Sale of services are recognised when services are rendered and related costs are incurred.
- Profit from partnership firms which are in the same line of operation is considered as operating income.
- Revenue from job work services is recognised based on the services rendered in accordance with the terms of contracts.
- Export benefit are accounted for in the year of exports based on eligibility and when there is no Uncertainty in receiving the same.

Other income

- Interest income is recognised on time proportion basis taking into account the amount outstanding and the rate applicable.
- Dividend income is recognised when right to receive is established.
- Rent income is booked as per terms of contracts.

12. Taxation:

Tax expense comprises current and deferred tax. Current income tax expense comprises taxes on income from operations in India and in foreign jurisdictions. Income tax payable in India is determined in accordance with the provisions of the Income Tax Act, 1961 and tax expense relating to overseas operations is determined in accordance with tax laws applicable in countries where such operations are domiciled.

- Deferred tax expense or benefit is recognized on timing differences being the difference between taxable income and accounting income that originate in one period and are capable of reversal in one or more subsequent periods.
- Deferred tax assets and liabilities are measured using the tax rates and tax laws that have been enacted or substantively enacted by the balance sheet date. Deferred income tax relating to items recognized directly in equity is recognized in equity and not in the statement of profit and loss. Deferred tax assets and deferred tax liabilities are offset, if a legally enforceable right exists to set off current tax assets against current tax liabilities and the deferred tax assets and deferred tax liabilities relate to the taxes on income levied by the same governing taxation laws
- Deferred tax liabilities are recognized for all taxable timing differences. Deferred tax assets are recognized only to the extent that there is reasonable certainty that sufficient future taxable income will be available against which such deferred tax assets can be realized. In situations where the Company has unabsorbed depreciation or carry forward tax losses, all deferred tax assets are recognized only if there is virtual certainty supported by convincing evidence that they can be realized against future taxable profits. In the situations where the Company is entitled to a tax holiday under the Income realized against future taxable profits. In the situations where the Company is entitled to a tax holiday under the Income tax Act, 1961 enacted in India, no deferred tax (asset or liability) is recognized in respect of timing differences which reverse during the tax holiday period, to the extent the Company's gross total income is subject to the deduction during the tax holiday period. Deferred tax in respect of timing differences which reverse after the tax holiday period is recognized in the year in which the timing differences originate.
- At each balance sheet date the Company re-assesses recognized and unrecognized deferred tax assets. The Company writes-down the carrying amount of a deferred tax asset to the extent that it is no longer reasonably certain or virtually certain, as the case may be, that sufficient future taxable income will be available against which the deferred tax asset can be realized. Any such write-down is reversed to the extent that it becomes reasonably certain or virtually certain, as the case may be, that sufficient future taxable income will be available. The Company recognizes unrecognized deferred tax assets to the extent that it has become reasonably certain or virtually certain, as the case may be, that sufficient future taxable income will be available against which such deferred tax assets can be realized.
- Minimum Alternative tax (MAT) credit is recognized as an asset only when and to the extent there is convincing evidence that the Company will pay normal income tax during the specified period. In the year in which the MAT Credit becomes eligible to be recognized as an asset in accordance with the recommendations contained in guidance note issued by the Institute of Chartered Accountants of India, the said asset is created

by way of a credit to the statement of profit and loss and shown as MAT Credit Entitlement. The Company reviews the MAT Credit Entitlement at each balance sheet date and writes down the carrying amount of the MAT Credit Entitlement to the extent there is no longer convincing evidence to the effect that Company will pay normal income tax during the specified period.

13. Earnings per share:

Basic earnings per share are calculated by dividing the net profit or loss for the period attributable to equity shareholders by the weighted average number of equity shares outstanding during the period.

For the purpose of calculating diluted earnings per share, the net profit or loss for the period attributable to equity shareholders and the weighted average number of shares outstanding during the year are adjusted for the effects of all dilutive potential equity shares.

14. Provisions:

A provision is recognized when there exists a present obligation as a result of past events and it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and a reliable estimate can be made of the amount of the obligation. Provisions are not discounted to present value and are determined based on best estimates required to settle the obligation at the reporting date. These estimates are reviewed at each reporting date and adjusted to reflect the current best estimates.

15. Contingent liabilities:

A contingent liability is a possible obligation that arises from past events whose existence will be confirmed only by the occurrence or non occurrence of one or more uncertain future events beyond the control of the Company or a present obligation that is not recognized because it is not probable that an outflow of resources will be required to settle the obligation. A contingent liability also arises in extremely rare cases where there is a liability that cannot be recognized because it cannot be measured reliably, the Company does not recognize a contingent liability but discloses its existence in the financial statements.

16. Cash and cash equivalent:

Cash and cash equivalents for the purposes of cash flow statement comprise cash at bank and in hand and short term deposits with banks with an original maturity of three months or less.

Other Disclosures:

17. Related Party disclosure:

(A)Enterprises Where Control Exists:	Name	Holding %/ Relationship	Nature of transactions
1)Holding Company	Acme Resources Limited	Holding Company 96%	Loan Taken, Repaid and Interest paid on Outstanding loan amount.
2) Subsidiaries (Extent Of Holding)	Nil	Nil	Nil
(B)Other Related Parties:	Nil	Nil	Nil
1) Joint Venture	Nil	Nil	Nil
2) Key Management Personal	Vivek Kesarwani Paramjeet Khamba	Director Director	Nil Nil
3)Other (Non Executive Chairman)	Nil	Nil	Nil
4)Employees' Benefit Plans where there is significant influence	Nil	Nil	Nil

18. Related Party Transactions:

- Details of Remuneration of Executive Directors for the financial year ended 31st March, 2019: Nil
- Details of Stock Options and Conditional Grants made to the Executive Directors: Nil
- Details of Remuneration of Non-Executive Directors for the financial year ended 31st March, 2019: Nil

19. Foreign currency transactions and translation

- **Initial Recognition:**

Foreign currency transactions are recorded in the reporting currency, by applying to the foreign currency amount the exchange rate between the reporting currency and the foreign currency at the date of the transaction.

- **Conversion:**

Foreign currency monetary items are reported using the closing rate. Non-monetary items which are carried in terms of historical cost denominated in a foreign currency are reported using the exchange rate at the date of the transaction.

- **Exchange Differences:**

Exchange differences arising on the settlement of monetary items, or on reporting such monetary items of Company at rates different from those at which they were initially recorded during the year, or reported in previous financial statements, are recognized as income or as expenses in the statement of profit and loss in the year in which they arise.

Derivatives and Commodity Hedging Transactions

In order to hedge its exposure to foreign exchange and commodity price risks, the Company enters into forward, option, and other derivative financial instruments. The Company neither holds nor issues any derivative financial instruments for speculative purposes. Derivative financial instruments are initially recorded at their fair value on the date of the derivative transaction and are re-measured at their fair value at subsequent balance sheet dates.

Foreign Exchange Earnings

During the year the Company has reported foreign exchange earnings of Rs. Nil Million (Previous year: Rs. Nil Million). The foreign exchange outgo on account of import of raw materials amounted to Rs. Nil Million (Previous year: Rs. Nil Million).

EXPENDITURE IN FOREIGN CURRENCY:

Particulars	Current	Previous
Professional and consultants fees	Nil	Nil
Royalty	Nil	Nil
Import of stock-in-trade	Nil	Nil
Other expenses (advertisement fees, travel, freight, training, etc)	Nil	Nil

Particular	Current	Previous
Foreign exchange used and earned	Nil	Nil
Foreign exchange earnings	Nil	Nil
CIF Value of imports	Nil	Nil
Expenditure in foreign currency	Nil	Nil

20. Other Accounting Standard Compliances:

- For the compilation of the annual accounts for the financial year ended 2019, the applicable accounting standards have been followed along with proper explanation relating to the material departures.
- The Cash Flow statement is prepared by the indirect method set out in the accounting standards on cash flow statement. Cash and cash equivalents for the purpose of cash flow statement comprise cash at bank and in hand.
- Diluted Earnings Per Share(EPS) pursuant to issue of shares on exercise of option calculated in accordance with [Accounting Standard 20 'Earnings Per Share']

In terms of our attached report of even date
For PRATAP VIKRAM AND ASSOCIATES
CHARTERED ACCOUNTANTS
FRN : 018387N



VIKRAM KESARWANI
(PARTNER)
M NO 500354
212-213 RAJINDRA JAINA TOWER-1
WAZIRPUR COMMERCIAL COMPLEX
DELHI-110052

For ATUL AGRO PRIVATE LIMITED


VIVEK KESARWANI

(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032



PARAMJEET SINGH
KHAMBA
(DIRECTOR)
(DIN : 05339940)
V-29, Vijaya Nagar
Gwalior-474011

Place : DELHI

Date : 15/05/2019

LETTER OF REPRESENTATION

To

VIKRAM KESARWANI
PARTNER
PRATAP VIKRAM AND ASSOCIATES
212/213 RAJENDER JAINA TOWER - 1, WAZIRPUR INDUSTRIAL AREA, NEW DELHI-110052 DELHI

Sub: Representation for the purpose of audit for the financial year 2018 - 2019 (Assessment year 2019-2020)

Dear Sir,

This representation letter is provided in connection with your audit of the financial statements of ATUL AGRO PRIVATE LIMITED for the year ended on 31/03/2019 for the purpose of expressing an opinion as to whether the financial statements give a true and fair view of the financial position of ATUL AGRO PRIVATE LIMITED, as on 31/03/2019 and of the results of operations for the year then ended. We acknowledge our responsibility for preparation of financial statements in accordance with the requirements of the Companies Act, 2013 and recognized accounting policies and practices, including the Accounting Standards issued by the Institute of Chartered Accountants of India.

We confirm, to the best of our knowledge and belief, the following representations;

1. Ours' is a private limited company incorporated under the Companies Act, 1956/2013 bearing Regn. No U74899DL1990PTC039889 dated No 18/04/1990. A copy of the memorandum & Articles of association is already with you.

Following persons are the members of the Board of Directors of the Company as on date :-

SN	Name of Director	Designation	Date of appointment
1.	VIVEK KESARWANI	DIRECTOR	26/08/2009
2.	PARAMJEET SINGH KHAMBA	DIRECTOR	23/12/2017

2. The Company has obtained all registrations/ license required to run the business.
3. So far the Company has filed I.T. Return for the FY ending March 2018. PAN of the Company is AADCA8929J. There are no demands/ appeals pending.
4. All the Statutory Compliance like VAT, Service Tax, GST, PF, ESIC etc, has been paid timely and there is no default there.
5. We have maintained following books of account:-
(a) Cash book (b) Bank Book (c) Ledger (d) Journal.

All the books have been kept on computer and printouts are taken on monthly/yearly basis as per needs. All the aforesaid books have been kept and maintained at 77, GROUND FLOOR, DIPNI APPARTMENT, PITUMPURA, DELHI, DELHI-110034.

6. We enclose herewith copy of final accounts for the year-ended 31/03/2019 duly approved by the Board of Directors of the Company, for your perusal and doing the needful

7. **Accounting Policies**

The accounting policies which are material or critical in determining the results of operations for the year or financial position are set out in the financial statements are consistent with those adopted in the financial statements for the previous year. The financial statements are prepared on accrual basis except discounts claims and rebates, which cannot be determined with certainty in the respective

accounting year.

8. **Assets**

The company has satisfactory title to all assets.

9. **Fixed Assets**

The net book values at which fixed assets are stated in the balance sheet are arrived at;

- (a) After taking into account all capital expenditure on additions thereto, but no expenditure properly chargeable to revenue.
- (b) After eliminating the cost and accumulated depreciation relating to items sold, discarded, demolished or destroyed.
- (c) After providing adequate depreciation on fixed assets during the period.

10. **Capital Commitments**

At the balance sheet date, there were no outstanding commitments for capital expenditure

11. **Investments**

- (a) The company does not have any investments.

12. **Inventories**

Company does not hold any Inventories.

13. **Debtors, Loans and Advances**

Company does not appearing debtors, loan and advances in the books as at 31/03/2019

14. **Liabilities**

- (a) We have recorded all known liabilities in the financial statements except retirement benefits, discounts claims and rebates.
- (b) We have disclosed in note to the financial statements all guarantees that, if any we have given to third parties.
- (c) There are no Contingent Liabilities as on 31/03/2019.

15. **Provisions for Claims and Losses**

- (a) There are no known losses and claims of material amounts for which provision is required to be made.
- (b) There have been no events subsequent to the balance sheet date which require adjustment of, or disclosure in, the financial statements or notes thereto.

16. **Profit and Loss Account**

Except as disclosed in the financial statements, the results for the year were not materially affected by;

- (a) transactions of a nature not usually undertaken by the company
- (b) circumstances of an exceptional or non-recurring nature
- (c) Charges or credits relating to prior years except as stated in the accounts
- (d) Changes in accounting policies

17. **General**

- (a) The following have been properly recorded and, when appropriate, adequately disclosed in the financial statements;
- (i) Loss arising from sale and purchase commitments.
 - (ii) Agreements and options to buy back assets previously sold.
 - (iii) Assets pledged as collateral.
- (b) There have been no irregularities involving management or employees who have a significant role in the system of internal control that could have a material effect on the financial statements.
- (c) The financial statements are free of material misstatements, including omissions.
- (d) The Company has complied with all aspects of contractual agreements that could have a material effect on the financial statements in the event of non-compliance. There has been no non-compliance with requirements of regulatory authorities that could have a material effect on the financial statements in the event of non-compliance.
- (e) We have no plans or intentions that may materially affect the carrying value or classification of assets and liabilities reflected in the financial statements.
- (f) The allocation between capital and revenue has been correctly done and that no items of capital nature have been debited to Profit & Loss account and vice versa.
- (g) The Cash balance as on 31/03/2019 has been physically verified by the management at Rs 400746 23.
- (h) The details of disputed dues in case of GST/Sales tax/ Income tax/ Customer tax/ Excise duty/ cess which have not been deposited on account of dispute is as under:

Name of Statute	Nature of the Dues	Amount (Rs.)	F. Y. to which the amount relates	Forum where dispute is pending
Income Tax	NIL.	NIL.	NIL.	NIL.

- (i) The company has not defaulted in repayment of dues to financial institution or bank.
- (j) The company has not given any guarantee for loans taken by others from bank or financial institutions.
- (k) We confirm that no short-term funds have been employed for long-term purposes.
- (l) We confirm that during the year company has not issued any shares.
- (m) We confirm that during the year company has not issued any debentures to any person.
- (n) We confirm that during the year company has not raised funds from public issue of shares.
- (o) We confirm that company is regular in payment of dues to banks against loans taken as per the terms of agreement. Further company has not issued any debentures.
- (p) None of the employees of the Company were in receipt of remuneration in excess of the limits specified under various provisions of the Companies Act, 2013.
- (q) We confirm that Company has duly complied all the provisions of Section 40(A)3 of the I.T. Act, 1961, read with Rule 6DD and has not made any payment of expenditure in excess of Rs 10000/- in Cash.
- (r) We confirm that Company has duly complied all the provisions of Section 269SS and 269T of

the I.T. Act, 1961 and has not taken/accepted and or repaid any loans or deposits in excess of limits prescribed under these sections otherwise them through account payee cheques and or draft as the case may be.

- (s) No personal expenses have been charged to revenue accounts.
- (t) No fraud has been committed during the year.
- (u) We hereby authorize Pratap Vikram & Associates, to file Income tax return, ROC Returns and use my DSC Signature for filing the above said documents with the concerned departments.

By order of the Board

for ATUL AGRO PRIVATE LIMITED



VIVEK KESARWANI
(DIRECTOR)
(DIN : 00137920)
ND-69 Pitampura
Delhi-110032

Dated: 15/05/2019
Place: DELHI