

CORPORATE INFORMATION

BOARD OF DIRECTORS

Mr. Sudhir kumar Agarwal	Director
Mrs. Payal Agarwal	Director
Mr. Amit Aggarwal	Director
Mr. Nitin Agarwal	Managing Director/ C.F.O.
Mr. Nikhil Bansal	Director
Mrs. Ambika Agarwal	Director

REGISTERED OFFICE

439, Vikas Marg, Jagriti Enclave Delhi-110092
CIN: L65100DL1981PLC012431
WEBSITE: www.sarnimal.com
EMAIL: sarnimalinvestltd@gmail.com
PHONE: 011-22481097

SECRETARIAL AUDITORS

M/s Richa Dhamija And Company
(Practicing Company Secretaries)
C.O.P. No. 12099

BOARD OF COMMITTEES

AUDIT COMMITTEE

Mr. Nikhil Bansal
Mrs. Payal Agarwal
Mrs. Ambika Agarwal

STATUTORY AUDITOR

M/s Moon and Company
Chartered Accountants
FRN No: 024693N

STOCK EXCHANGE

Metropolitan Stock Exchange of India Limited

NOMINATION AND REMUNERATION COMMITTEE

Mr. Nikhil Bansal
Mrs. Payal Agarwal
Mrs. Ambika Agarwal

STAKEHOLDER RELATIONSHIP COMMITTEE

Mr. Nikhil Bansal
Mrs. Payal Agarwal
Mrs. Ambika Agarwal

INVESTORS HELP DESK & EMAIL

Mrs. Megha Gupta
(Compliance Officer)
Email ID: sarnimalinvestltd@gmail.com
Phone No: 011- 22481097

INTERNAL AUDITOR

M/s ANVC & Co.
(Chartered Accountant)
FRN No: 028429N

REGISTRAR AND TRANSFER AGENT

Skyline Financial Services Pvt Ltd, D-153 A,
1st Floor, Okhla Industrial Area,
Email: viren@skylinerta.com
Ph No. 011-26812682

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BOARD REPORT

To,
The Members
Sarnimal Investment Limited

Your Directors have pleasure in presenting the Annual Report of the Company together with the Audited Accounts for the financial year ended March 31st, 2020.

FINANCIAL RESULTS AND HIGHLIGHTS

(Amount in ₹)

Particulars	F.Y. 2019-20	F.Y. 2018-19
Sales/ Income from operations	116497551	21657329.00
Total Expenses	116295219	22587116.00
Profit/ (loss) before exceptional item and tax	202332	(929787.00)
Less: Exceptional Items	(54990)	900000.00
Profit/ (loss) before tax for the year	147342	(29787.00)
Less: Income tax and deferred tax expenses	(38309)	0.00
Profit after tax for the year	109033	(29787.00)
Other Comprehensive Income/ Loss	0	0.00
Net Profit/ Loss for the Year	109033	(29787.00)

COMPANY'S PERFORMANCE

Even though the provisions of Companies Act, 2013 regarding corporate social responsibility are not attracted to the company yet the company has been indulged in the enhancement of shareholder value through sound business decisions, prudent to financial management and high standard of ethics throughout the organization.

CHANGE IN NATURE OF BUSINESS

There was no change in nature of business of the company during the year 2019-20.

DIRECTORS

Composition of Board of Directors and Key managerial Personnel:-

S.NO.	NAME	DESIGNATION
1.	Mr. Nitin Agarwal	Managing Director/ Chief Financial Officer (C.F.O.)
2.	Mr. Amit Aggarwal	Director
3.	Mrs. Payal Agarwal	Director
4.	Mr. Sudhir Kumar Agarwal	Director
5.	Mr. Nikhil Bansal	Director
6.	Ms. Ambika Agarwal	Director
7.	Mrs. Megha Gupta	Company Secretary

Rotation of Director

Mr. Amit Aggarwal (DIN-02504414) is liable to retire by rotation at the ensuing Annual General Meeting and being eligible offer herself for re-appointment.

CHANGE IN MANAGEMENT

There is no change in the management of company during the financial year 2019-20.

SUBSIDIARY COMPANIES, JOINT VENTURES & ASSOCIATE COMPANIES

As on 31st March 2020, the Company has no Subsidiary, Joint- Venture or Associate Company.

CONSOLIDATED FINANCIAL STATEMENT

As company has no Subsidiary, Joint- Venture or Associate Company, accordingly provision for preparation of consolidated Financial Results are not applicable to company.

DEPOSITS

During the year under review the Company has not accepted any deposit falling within the meaning of section 73 of the Companies Act, 2013 and the Companies (Acceptance of Deposits) Rules, 2014.

DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS OR TRIBUNALS IMPACTING THE GOING CONCERN STATUS AND COMPANY'S OPERATIONS IN FUTURE

During the year there was no significant and material order passed by any regulators or court or tribunal which would impact the going concern status and company's operations in future.

STATE OF COMPANY'S AFFAIRS

The company Profit has increased as compared to last year. Even though the provisions of Companies Act, 2013 regarding corporate social responsibility are not attracted to the company yet the company has been indulged in the enhancement of shareholder value through sound business decisions, prudent to financial management and high standard of ethics throughout the organization.

RESERVES

The Board of the company transfer amount of Rs. 1,09,033 to reserves as company earned profit during the F.Y. 2019-20.

DIVIDEND

The Board has not recommended any dividend for the year 2019-20 and therefore there is no liability arises for the payment of Dividend Distribution Tax (DDT).

MATERIAL CHANGES AND COMMITMENT THAT AFFECT THE COMPANY'S FINANCIAL POSITION

There was no material change during the year 2019-20 that affect the financial position of company and therefore no requirement was raised to disclose remedial measures.

GENERAL INFORMATION OF COMPANY

Management has overviewed of the industry in respect of our company and observed that there was no important change in industry during the last year 2019-20 which had impacts on company's performance.

CAPITAL AND DEBT STRUCTURE

The Authorized Capital of the company is 5, 00, 00,000.00/- and paid up Equity Share Capital as on 31st March, 2020 was 44, 98, 0000.00/- each @ 1/- per share. There was no change in the capital structure of company and company has not issued any new share or convertible securities during the year 2019-20. The Company not issued shares with differential voting rights nor granted stock options nor sweat equity. Instead of above that the company was not issued any debentures, bonds, warrants or any non convertible securities during the year 2019-20.

The company has not held any shares in trust for the benefit of employees where the voting rights are not exercised directly by the employees.

NBFC REGISTRATION

The company has been registered with Reserve Bank of India as Non Banking Finance Company vides Registration No. B-14.02077 Dated 11th February, 2000. Your Company is categorized as a Non-deposit taking, Non-Banking Financial Company. The Company has not accepted any deposit from the public during the year pursuant to the provisions of Section 73 of Companies Act, 2013.

COMPLIANCE WITH RBI GUIDELINES

Your Company has complied with all the regulations of Reserve Bank of India as on 31st March, 2020; applicable to it as Non-Deposit taking Non-Banking Finance Company.

MEETING OF BOARD OF DIRECTORS

A calendar of Meetings is prepared and circulated in advance to the Directors. During the year six (5) Board Meetings held. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

During the year Financial Year from 1st April, 2019 to 31st March, 2020, the board of directors met Five (5) times 28.05.2019, 14.08.2019, 31.08.2019, 14.11.2019, 13.02.2020 during the financial year ended March 31, 2020.

DECLARATION BY INDEPENDENT DIRECTOR

The company has two (2) Independent Directors i.e. Mr. Nikhil Bansal and Mrs. Ambika Agarwal. The company has received necessary declaration from Directors under section 149 of the companies Act, 2013 and that the Independent Directors have complied with the Code for Independent Directors prescribed in Schedule IV to the Companies Act, 2013.

DIRECTORS RESPONSIBILITY STATEMENT

Pursuant to Section 134 (5) of the Companies Act, 2013, your Directors report as under:

- a) That in the preparation of the annual accounts, the applicable accounting standards have been followed.
- b) That the Directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit or loss of the company for that period.
- c) That the directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities.
- d) That the Directors have prepared the annual accounts on a going concern basis.

- e) That the Directors had laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and operating effectively.
- f) That 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.

POLICY ON DIRECTOR'S APPOINTMENT AND REMUNERATION

The current policy is to have an appropriate mix of executive, non-executive and independent Director to maintain the independence of the Board, and separate its functions of governance and management. As of March, 31 2020, the Board had six (6) Directors.

The Policy of the company on directors' appointment and remuneration, including the criteria for determining qualifications, positive attributes, independence of a director and other matters, as required under sub-section (3) of section 178 of Companies Act, 2013 is in place and maintained by company as per law.

EXPLANATIONS BY BOARD ON QUALIFICATIONS BY STATUTORY AUDITOR, SECRETARIAL AUDITOR AND INTERNAL AUDITOR

There was no qualification, reservation and adverse remark given by Statutory Auditor, Secretarial Auditor in their audit reports.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENT

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

MATERIAL CHANGES AND COMMITMENTS

There is no material change took place between the end of the financial year of the company to which the financial statements relate and the date of the report in the company which may affect the financial position of the company.

RELATED PARTIES TRANSACTIONS

There are no materially significant related party transactions made by the Company with the Promoters, Key Management Personnel or other designated persons which may have potential conflict with interest of the Company at large. The AOC-2 as per the Companies Act, 2013 has been attached herewith under "Annexure A".

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

The information required to be furnished under section 134 (3)(m) of the Companies Act, 2013 read with the Companies (Accounts) Rules, 2014 relating to Conservation of Energy, Technology absorption and Foreign Exchange earnings and outgo is **annexed in " Annexure B" herewith** and forming part of this report.

BUSINESS RISK MANAGEMENT

The main objective of this policy is to ensure sustainable business growth with stability and to promote a pro-active approach in reporting, evaluating and resolving risks associated with the business. In order to achieve the key objective, the policy establishes a structured and disciplined approach to Risk Management, in order to guide decisions on risk related issues.

In today's challenging and competitive environment, strategies for mitigating inherent risks in accomplishing the growth plans of the Company are imperative. The common risks inter alia are:

Regulations, competition, Business risk, Technology obsolescence, Investments, retention of talent and expansion of facilities.

Business risk, inter-alia, further includes financial risk, political risk, fidelity risk, legal risk. As a matter of policy, these risks are assessed and steps as appropriate are taken to mitigate the same.

CORPORATE SOCIAL RESPONSIBILITY INITIATIVES

The company needs not to comply with the provisions of Section 135 of Companies act, 2013, as the company does not fall in eligibility ambit of Corporate Social Responsibility initiatives.

INDUSTRIAL RELATIONS

During the year under review, your Company enjoyed cordial relationship with workers and employees at all level.

INTERNAL FINANCIAL CONTROL SYSTEMS AND THEIR ADEQUACY

The Company has an Internal Control System, commensurate with the size, scale and complexity of its operations. The internal Audit functions reports to the Chairman of the Audit Committee and to Chairman and Managing Director of the Company.

M/s ANVC & Co, Chartered Accountants, (FRN No: 028429N), acts as an Internal Auditor of the Company. The Internal Audit monitors and evaluates the efficiency and adequacy of internal control systems in the company. It's compliances with operating systems, accounting procedure and policies at all locations of the Company.

REPORTING OF FRAUDS

There have been no instances of fraud reported by the Statutory Auditors under Section 143 of the Act read with relevant Rules framed thereunder either to the Company or to the Central Government.

SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015

As per the SEBI Circular No. **SEBI/LAD-NRO/GN/2015-16/013** dated 2nd September, 2015 of Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015, the Paid up equity capital as on the last day of previous financial year i.e. on 31st March 2019 was ₹4,49,80,000.00/- and Net Worth was ₹ 45785090.00/-.

Therefore, in terms of the said circular the compliance with the corporate governance provisions as specified in **Regulations 17, 18, 19, 20, 21,22, 23, 24, 25, 26, 27 and clauses (b) to (i) of sub-regulation (2) of regulation 46 and para C , D and E of Schedule V shall not apply** in our Company during the F.Y. 2019-20.

CODE OF CONDUCT

The Board of Directors has approved a Code of Conduct which is applicable to the Members of the Board and all employees in the course of day to day business operations of the Company.

AUDIT COMMITTEE

The Audit Committee of the Company duly constituted by the following members:-

- i) Mr. Nikhil Bansal
- ii) Mrs. Ambika Agarwal
- iii) Mrs. Payal Agarwal

Meetings of the Committee:

The Committee met four (4) times on 28.05.2019, 14.08.2019, 14.11.2019, 13.02.2020 during the financial year ended March 31, 2020.

The Minutes of the Meetings of the Audit Committee are discussed and taken note by the board of directors.

The Statutory Auditor, Internal Auditor and Executive Directors/ Chief Financial Officer are invited to the meeting as and when required.

The Composition of the Audit Committee and Their Attendance at the Meeting:

Name Of Members	Category / Designation	No. of Meetings		Attendance Percentage (%)
		Held	Attended	
Mr. Nikhil Bansal	Chairperson	4	4	100
Mrs. Ambika Agarwal	Member	4	4	100
Mrs. Payal Aggarwal	Member	4	4	100

No sitting fees have been paid to any director during the year. The remuneration paid to all Key management Personnel was in accordance with remuneration policy adopted by the company. All members have attended the meeting in person.

NOMINATION AND REMUNERATION COMMITTEE

The Nomination and Remuneration Committee of the Company duly constituted by the following members:-

- i) Mr. Nikhil Bansal
- ii) Mrs. Ambika Agarwal
- iii) Mrs. Payal Aggarwal

The Committee met four (4) times on 28.05.2019, 14.08.2019, 14.11.2019, 13.02.2020 during the financial year ended March 31, 2020.

The Composition of the Nomination and Remuneration Committee and their Attendance at the Meeting:

Name Of Members	Category / Designation	No. of Meetings		Attendance Percentage (%)
		Held	Attended	
Mr. Nikhil Bansal	Chairperson	4	4	100
Mrs. Ambika Agarwal	Member	4	4	100
Mrs. Payal Aggarwal	Member	4	4	100

No sitting fees have been paid to any director during the year. The remuneration paid to all Key management Personnel was in accordance with remuneration policy adopted by the company. All members have attended the meeting in person.

STAKEHOLDERS RELATIONSHIP COMMITTEE

The Stakeholders Relationship Committee of the Company duly constituted by the following members:-

- i) Mr. Nikhil Bansal
- ii) Mrs. Ambika Agarwal
- iii) Mrs. Payal Aggarwal

The Committee met four (4) times on 28.05.2019, 14.08.2019, 14.11.2019, 13.02.2020 during the financial year ended March 31, 2020.

The Composition of the Stakeholder Relationship Committee and their Attendance at the Meeting:

Name Of Members	Category / Designation	No. of Meetings		Attendance Percentage (%)
		Held	Attended	
Mr. Nikhil Bansal	Chairperson	4	4	100
Mrs. Ambika Agarwal	Member	4	4	100
Mrs. Payal Aggarwal	Member	4	4	100

No sitting fees have been paid to any director during the year. The remuneration paid to all Key management Personnel was in accordance with remuneration policy adopted by the company. All members have attended the meeting in person.

INDEPENDENT DIRECTOR MEETING

During F.Y. 2020, one (1) meeting of the Independent Directors was held on 13th February, 2020. The Independent Directors, inter-alia, reviewed the performance of Non-Independent Directors, Board as a whole and Chairman of the Company, taking into account the views of executive directors and non-executive directors. No other Director was present in meeting except Independent Director.

VIGIL MECHANISM / WHISTLE BLOWER POLICY

In order to ensure that the activities of the Company and its employees are conducted in a fair and transparent manner by adoption of highest standards of professionalism, honesty, integrity and ethical behavior the company has adopted a vigil mechanism policy.

PREVENTION OF INSIDER TRADING

The Company has adopted a Code of Conduct for Prevention of Insider Trading with a view to regulate in securities by the Directors and designated employees of the Company. The Code requires pre-clearance for dealing in the Company's shares and prohibits the purchase or sale of Company shares by the Directors and the designated employees while in possession of unpublished price sensitive information in relation to the Company and during the period when the Trading Window is closed. The Board is responsible for implementation of the Code.

All Board Directors and the designated employees have confirmed compliance with the code.

DISCLOSURES PERTAINING TO THE SEXUAL HARASSMENT OF WOMEN AT THE WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The company has complied with the provision relating to the constitution of Internal Complaints Committee under the Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act, 2013 and also SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as follows:

- a. number of complaints filed during the financial year : Nil
- b. number of complaints disposed of during the financial year : Nil
- c. number of complaints pending as on end of the financial year : Nil

STATUTORY AUDITOR AND INTERNAL AUDITOR REPORTS

M/S MOON AND COMPANY, CHARTERED ACCOUNTANT (FRN 0024693N), who have been the Statutory Auditor of the Company for the F.Y. 2019-2024 for the term of Five (5) Years continues to be Statutory Auditor of the Company for the F. Y. 2020-21 also.

As per the MCA Notification Dated 7th May, 2018 read with The Companies (Amendment) Act, 2017 also read with section 139 of Companies Act, 2013, there is no need to ratify the term of auditor in every ensuing Annual General Meeting till the continuation of his term. Hence, no resolution has been inserted for ratification of Statutory Auditor. The Independent Auditor Report is annexed with Annual report.

M/s ANVC & CO. (Chartered Accountant) FRN No: 028429N who have been appointed as Internal Auditor of the company. There s no any qualification or remarks in their report.

SECRETARIAL AUDIT REPORTS:

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 **M/S Richa Dhamija And Company (Practicing Company Secretary)** to undertake the Secretarial Audit of the Company.

The Secretarial Audit Report is annexed herewith as "**Annexure C**" in the Form MR-3.

EXPLANATIONS BY BOARD ON QUALIFICATIONS BY STATUTORY AUDITOR, SECRETARIAL

There are no qualifications in Secretarial Auditor's and Statutory Auditor's in their reports that company board has to provide explanation.

COMPLIANCE WITH SECRETARIAL STANDARD

All the applicable Secretarial Standard was complied by company during the year 2019-20. Applicable Secretarial Standard-1 and Secretarial Standard-2 took in consideration while meeting of Board of Directors and General meetings are conducted during the year. Secretarial Standard-4 was considered for preparation of Board Report of company during the year 2019-20.

PARTICULARS OF EMPLOYEES

Information as per Section 134 of the Companies Act, 2013 read with Companies (Particulars of Employees) Rules, 1975 are given in the statement which form a part of this report. However as per the provisions of section 136 of the Companies Act, 2013, the report and accounts are being sent to all shareholders of the Company excluding the aforesaid information. Any shareholder interested in obtaining a copy of the particulars may write to the Company's Registered Office.

LISTING WITH STOCK EXCHANGES

The Company confirms that it has paid the Annual Listing Fees for the year 2020-21 to MSEI where the Company's Shares are listed.

ACKNOWLEDGEMENT

Your Directors place on record their sincere appreciation of the services rendered by the employees of the Company. They are grateful to shareholders, bankers, depositors, customers and vendors of the company for their continued valued support. The Directors look forward to a bright future with confidence.

CAUTIONARY STATEMENT

The statements contained in the Board's Report contain certain statements relating to the future and therefore are forward looking within the meaning of applicable securities, laws and regulations various factors such as economic conditions, changes in government regulations, tax regime, other statutes, market forces and other associated and incidental factors may however lead to variation in actual results.

**For and on behalf of the Board
Sarnimal Investment Limited**

Place: Delhi
Dated: 03.09.2020

Nitin Agarwal
(DIN: 03122245)
(Managing Director)

Sudhir Kumar Agarwal
(DIN: 00024935)
(Director)

FORM NO. AOC-2

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

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

1. Details of contracts or arrangements or transactions not at arm's length basis:- None
 - (a) Name(s) of the related party and nature of relationship
 - (b) Nature of contracts/arrangements/transactions
 - (c) Duration of the contracts/arrangements/transactions
 - (d) Salient terms of the contracts or arrangements or transactions including the value, if any
 - (e) Justification for entering into such contracts or arrangements or transactions
 - (f) Date of approval by the Board
 - (g) Amount paid as advances, if any:
 - (h) Date on which the special resolution was passed in general meeting as required under first proviso to section 188

2. Details of material contracts or arrangement or transactions at arm's length basis:- refer Note No. 25 of Financial Statements.
 - (a) Name(s) of the related party and nature of relationship
 - (b) Nature of contracts/arrangements/transactions
 - (c) Duration of the contracts/arrangements/transactions
 - (d) Salient terms of the contracts or arrangements or transactions including the value, if any:
 - (e) Date(s) of approval by the Board, if any:
 - (f) Amount paid as advances, if any:

**For and on behalf of the Board
Sarnimal Investment Limited**

**Place: Delhi
Dated: 03.09.2020**

**Nitin Agarwal
(DIN: 03122245)
(Managing Director)**

**Sudhir Kumar Agarwal
(DIN: 00024935)
(Director)**

As per section 134(3) of the Companies Act, 2013 read with Companies (Accounts) Rules, 2014

i) Conservation of Energy

The operations involve low energy consumption. Wherever possible, energy conservation measures have been implemented. Efforts to conserve and optimize the use of energy are a continuous process.

ii) Technology Absorption

1. Specific areas in which R & D carried out are as follows:

- a) Review of the existing courses and evaluation of feasibility of the new courses to be launched and estimating the costing thereof.
- b) Providing technical support on existing products.

2. Benefits derived as a result of the above R & D

As a result the organization is being able to implement current courses.

3. Expenditure on R & D: NIL

iii) Foreign Exchange Earnings & Outgo

There were no foreign exchange earnings as well as outgo of the Company during the year under report.

ACKNOWLEDGMENT

Your Directors would like to express their grateful appreciation for assistance and Co-operation received from the financial institutions, Government Authorities, Customers, Vendors and Members during the year under review. Your Directors, also wish to place on record their deep sense of appreciation for the committed services of executives, staff and workers of Company.

**For and on behalf of the Board
Sarnimal Investment Limited**

**Place: Delhi
Dated: 03.09.2020**

**Nitin Agarwal
(DIN: 03122245)
(Managing Director)**

**Sudhir Kumar Agarwal
(DIN: 00024935)
(Director)**

Form No. MR-3
SECRETARIAL AUDIT REPORT
For The Financial Year Ended 31st March, 2020

[Pursuant to section 204(1) of the Companies Act, 2013 and Rule No. 9 of the Companies (Appointment and Remuneration Personnel) Rules, 2014]

To,
The Members,
SARNIMAL INVESTMENT LIMITED
439, Vikas Marg , Jagriti
Enclave Delhi-110092

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Sarnimal Investment Limited (hereinafter called "the Company"). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company, the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, the explanations and clarifications given to us and the representations made by the Management, we hereby report that in our opinion, the Company has during the audit period covering the financial year ended on March 31, 2020, generally 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:

We have examined the books, papers, minute books, forms and returns filed and other records made available to us and maintained by the Company for the financial year ended on March 31, 2020 according to the applicable provisions of:

- (i) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (ii) The Securities Contract (Regulation) Act, 1956 ('SCRA') and the rules made thereunder;
- (ii) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (iii) 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;
- (iv) 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, 2015;
 - (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 and The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 and amendments from time to time;
 - (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the audit period)
 - (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the Company during the audit period)
 - (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; (Not applicable to the Company during the audit period)

- (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; (Not applicable to the Company during the audit period) and
- (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 and The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018, (Not applicable to the Company during the audit period).

(vi) Other laws applicable specifically to the Company namely:-

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India with respect to board and general meetings.
- (ii) The Listing Agreements entered into by the Company with BSE Limited read with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

We further report that:

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors. 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.

Adequate notice was given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance for meetings other than those held at shorter notice, 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.

As per the minutes, the decisions at the Board Meetings were taken unanimously.

We 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 etc.

**For Richa Dhamija And Company
(Practicing Company Secretaries)**

**Richa Dhamija
M. NO. F9776
COP NO. 12099**

**Place: Delhi,
Date: 03.09.2020**

This Report is to be read with our letter of even date which is annexed as Annexure A and Forms an integral part of this report.

To,

The Members,
SARNIMAL INVESTMENT LIMITED
439, Vikas Marg , Jagriti
Enclave Delhi-110092

Our report of even date is to be read along with this letter.

1. Maintenance of secretarial records is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the process and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where ever required, we have obtained the Management Representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedure on test basis.
6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For Richa Dhamija And Company
(Practicing Company Secretaries)**

**Richa Dhamija
M. NO. F9776
COP NO. 12099**

**Place: Delhi
Date: 03.09.2020**

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

1. Industry structure and developments

The company is engaged in trading in shares, financial services and investment activities where the outlook of the business seems to be encouraging over and above we have been diversified into different businesses ranging from third party product distributions (lowest balance sheet risk) to originating unsecured personal loans, corporate loans (highest balance sheet risk). We believe that we are well placed to leverage on the growth opportunities in the economy.

2. Opportunities and Threats

OPPORTUNITIES

- Increase in Income levels will aid greater penetration of financial products.
- Positive regulatory reforms.
- Increase in corporate growth & risk appetite.
- Greater efficiency in debt market operations which will also help greater penetration.
- Increased securitization.
- Focus on selling new product/services.

THREATS

- Inflation could trigger increase in consumer price inflation, which would dampen growth.
- Increased competition in both local & overseas markets.
- Unfavorable economic development.
- Market risk arising from changes in the value of financial instruments as a result of changes in market variables like interest rate and exchange rates.

3. Segment-wise or product-wise performance:

The company has only one segment line of business. Hence, this head does apply to our company.

4. Risks and concerns

Management of risk to the business is continuous challenge for any organization growing in size and enhancing its purpose. The traditional risk factors like client risks, industry segment risks and economic risk are well understood and the means to handle them are also fairly established.

5. Internal control systems and their adequacy

The company ensures existence of adequate internal control through policy and procedures to be followed by the executives at various levels in the company. The operating managers ensure compliance within their areas. The Company has internal Audit system to carry out extensive checking and test and report noncompliance/ weakness, if any through internal Audit Reports on the respective areas. These reports along with reports on compliance made thereafter are reviewed by the Audit Committee of the Board.

6. Material developments in Human Resources / Industrial Relations front, including number of people employed

Management relation with the employees remains cordial. The Company's Human Resources philosophy is to establish and build a strong performance and competency drive culture with greater senses of accountability and responsibility. The industrial relations scenario remained peaceful and harmonious.

7. Disclosure Of Accounting Treatment

The financial statements of the Company have been prepared in accordance with the Indian Accounting Standards (IND AS) to comply with the Accounting Standards notified under Section 133 of the Companies Act, 2013 ("the 2013 Act") and the relevant provisions of the 2013 Act, as applicable. The financial statements have been prepared on going concern basis under the historical cost convention on accrual basis. The Company has followed to continue with the period of 1st day of April to 31st day of March, each year as its financial year for the purpose of preparation of financial statements under the provisions of Section 2(41) of the Companies Act, 2013.

Cautionary Statement

Statements in the Management Discussion and Analysis describing the Company's objectives, expectations, predictions and assumptions may be "FORWARD LOOKING" within the meaning of applicable Laws and Regulations. Actual results may differ materially from those expressed herein, important factors that could influence the Company's operations include domestic economic Conditions affecting demand, supply, price conditions, and change in Government's regulations, tax regimes, other statutes and other factors such as industrial relations.

**For and on behalf of the Board
Sarnimal Investment Limited**

**Place: Delhi
Dated: 03.09.2020**

**Nitin Agarwal
(DIN: 03122245)
(Managing Director)**

**Sudhir Kumar Agarwal
(DIN: 00024935)
(Director)**

INDEPENDENT AUDITOR'S REPORT
TO THE MEMBERS OF SARNIMAL INVESTMENT LIMITED

I. Report on the Audit of the Standalone Financial Statements

1. Opinion

- A. We have audited the accompanying Standalone Financial Statements of **Sarnimal Investment Limited** ("the Company"), which comprise the Balance Sheet as at March 31, 2020, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows 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 read with the Companies (Indian Accounting Standards) Rules, 2015, as amended, ("IndAS") and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2020, 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 there-under, 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 that there is no matters to be describing in key audit matters.

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 Annexure to Board's Report, Corporate Governance and Shareholder's Information to the extent applicable, 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 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, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Ind AS and other 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 is 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.
- 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. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.

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 Statement, 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.

II. Report on Other Legal and Regulatory Requirements

1. 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 including Other Comprehensive Income, Statement of Changes in Equity and the Statement of Cash Flow 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 Ind AS 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, 2020 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2020 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 over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in “Annexure A”. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company’s internal financial controls over financial reporting.
 - 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:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act.
 - 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:
 - i) The Company does not have any pending litigations which would impact its financial position.
 - ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - iii) There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
2. As required by the Companies (Auditor’s Report) Order, 2016 (“the Order”) issued by the Central Government in terms of Section 143(11) of the Act, we give in “Annexure B” a statement on the matters specified in paragraphs 3 and 4 of the Order to the extent applicable.

For: Moon And Company
Chartered Accountants
FRNo.024693N

CA Moon Goel
(Partner)
M. No. 523034

Place: New Delhi
Dated: 10/07/2020

SARNIMAL INVESTMENT LIMITED

Annexure "A" to the Independent Auditors Report

Pursuant to Companies (Auditors Report) Order 2016

Report on the Internal Financial Controls under Clause (i) of sub-section 3 Section 143 of the Companies Act, 2013 ('the Act')

We have audited the internal Financial Controls over financial reporting of **SARNIMAL INVESTMENT LIMITED** ("the Company") as at March 31, 2020 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Company's Management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India (ICAI). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to the Company's policies, the safeguarding for its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditor's Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the 'Guidance Note') and the Standards on Auditing, issued by the ICAI and deemed to be prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditors' judgement, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis of our audit opinion on the Company's internal financial controls system over financial reporting.

Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the Company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the Company are being made only in accordance with authorizations of the Management and directors of the Company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the Company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31st March 2020, based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For: Moon And Company
Chartered Accountants
FRNo.024693N

CA Moon Goel
(Partner)
M. No. 523034

Place: New Delhi
Dated: 10/07/2020

SARNIMAL INVESTMENT LIMITED

Annexure “B” to the Independent Auditors Report

Pursuant to Companies (Auditors Report) Order 2016

- (i) (a) As explained to us, Company has no fixed assets, so there is no question arises to maintain the records of fixed assets.
- (b) As explained to us, whether the company has no fixed assets, physical verification of fixed assets is not applicable by the management.
- (c) As explained to us, there is no immovable property held by the company.
- (ii) As explained to us, the company hold inventory of shares and those are in de-mat form so it is not possible to physically verified by the management.
- (iii) The Company has granted loans, secured or unsecured to companies, firms, Limited Liability Partnership or other parties covered in the register maintained under section 189 of the Act. Accordingly the provisions of clause 3(iii) (a) to (C) of the Order are applicable to the Company.
 - 1. The Terms and conditions of the grant of such loan are not prejudicial to the company’s interest
 - 2. The schedule of repayment of principal and payment of interest has been stipulated and the repayments and receipts are regular.
 - 3. The amount is not overdue.
- (iv) In our opinion and according to the information ad explanations given to us, the company has complied with the provisions of section 185 and 186 of the Companies Act, 2013, in respect of loans, investments, guarantees, and security.
- (v) The company has not accepted any deposit from the public and hence the directives issued by the Reserve Bank of India and the provisions of Section 73 to 76 or any other relevant provisions of the Act and the Companies (Acceptance of Deposit) Rules, 2015 with regard to the deposits accepted from the public are not applicable.
- (vi) As informed to us, the maintenance of cost records has not been specified by the Central Government under sub-section (1) of Section 148 of the Companies Act, in respect of the activities carried on by the company.
- (vii) (a) According to information and explanations given to us and on the basis of our examination of the books of account, and records, the Company has been generally regular in depositing undisputed statutory dues including provident fund, Employees State Insurance, Income-Tax, Sales Tax, Service Tax, Duty of Customs, Duty of Excise, Value Added Tax, Goods and Services Tax, Cess and any other statutory dues with the appropriate authorities. According to the information and explanations given to us, no undisputed amounts payable in respect of the above were in arrears as at March 31, 2020 for a period of more than six months from the date on when they become payable.
- (b) According to the information and explanations given to us, there are no dues of Income Tax, sales tax, service tax, duty of customs, duty of excise, value added tax outstanding on account of any dispute.
- (viii) In our opinion and according to the information and explanations given to us, the company has not defaulted in repayment of dues of banks. The Company has not taken any loan either from financial institutions or from the government and has not issued any

debentures.

- (ix) Based upon the audit procedures performed and the information and explanations given by the management, the Company has not raised money by way of initial public offer or further public offer including debt instruments and term loans. Accordingly, the provisions of clause 3(ix) of the order are not applicable to the company and hence not commented upon.
- (x) Based upon the audit procedures performed and the information and explanations given by the management, we report that no fraud by the company or on the company by its officers or employees has been noticed or reported during the year.
- (xi) Based upon the audit procedures performed and the information and explanations given by the management, the managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of Section 197 read with Schedule V of the Companies Act.
- (xii) In our opinion, the company is not a Nidhi Company. Therefore, the provisions of clause 4(xii) of the order are not applicable to the Company.
- (xiii) In our opinion, all transactions with the related parties are in compliance with section 177 and 188 of the Companies Act, 2013 and the details have been disclosed in the Financial Statements as required by the applicable accounting standards.
- (xiv) Based upon the audit procedures performed and the information and explanations given by the management, the Company has not made any preferential allotment of private placement of shares or fully or partly convertible debentures during the year under review. Accordingly, the provisions of clause 3(xiv) of the Order are not applicable to the Company and hence not commented upon.
- (xv) Based upon the audit procedures performed and the information and explanations given by the management, the Company has not entered into any non-cash transactions with directors or persons connected with them. Accordingly, the provisions of clause 3 (xv) of the Order are not applicable to the Company and hence not commented upon.
- (xvi) The Company is registered under section 45-IA of the Reserve Bank of India Act, 1934.

For: Moon And Company
Chartered Accountants
FRNo.024693N

CA Moon Goel
(Partner)
M. No. 523034

Place: New Delhi
Dated: 10/07/2020

Sarnimal Investment Limited

CIN NO. L65100DL1981PLC012431
439, Vikas Marg, Jagriti Enclave, Delhi-110092

Balance Sheet As on 31st March, 2020

(Amount in Rs)

Particulars	Note No.	As at March 31, 2020	As at March 31, 2019
ASSETS			
Non-current assets			
(a) Property, Plant and Equipment		-	-
(b) Capital Work in Progress		-	-
(c) Intangible assets		-	-
(d) Financial assets		-	-
(e) Advance Income tax assets (net)		-	-
(f) Deferred tax assets		56,955	56,955
(g) Other non-current assets	4	109,156,804	84,281,863
		109,213,759	84,338,818
Current assets			
(a) Inventories	5	1,113,756	79,453,611
(b) Financial Assets			
(i) Investments		5,545,000	-
(ii) Trade receivables	6	(324)	12,362
(iii) Cash and cash equivalents	7	2,612,032	2,860,951
(c) Current Income tax assets (net)		-	-
(d) Other current assets	8	1,129,720	770,693
		10,400,184	83,097,617
TOTAL ASSETS		119,613,943	167,436,435
EQUITY AND LIABILITIES			
Equity			
Equity share capital	9	44,980,000	44,980,000
Other Equity	10	814,682	805,090
		45,794,682	45,785,090
Liabilities			
Non-current Liabilities			
(a) Financial liabilities			
(b) Provisions		-	-
(c) Deferred tax liabilities (Net)		-	-
(d) Other non-current liabilities		-	-
Total A		-	-
Current Liabilities			
(a) Financial liabilities			
(i) Trade payables	11	-	45,118,369
(ii) Other financial liabilities	12	72,082,583	73,694,365
(b) Other current liabilities	13	1,261,804	2,501,487
(c) Provisions	14	474,874	337,124
Total B		73,819,261	121,651,345
Total liabilities (A+B)		73,819,261	121,651,345
Total equity and liabilities		119,613,943	167,436,435

See accompanying note nos. 1 to 25 forming part of the financial statements

In terms of our report attached of the even date

For And on Behalf of the Board
Sarnimal Investment Limited

For : Moon And Company
(Chartered Accountants)
Firm Reg. No. 024693N

Nitin Agarwal
(Managing Director)
DIN-03122245

Sudhir kumar Agarwal
(Director)
DIN-00024935

Megha Gupta
(C.S)
PAN:AMJPG310

Nitin Agarwal
(CFO)
PAN:AMWPA6693F

Sarnimal Investment Limited

CIN NO. L65100DL1981PLC012431

439, Vikas Marg, Jagriti Enclave, Delhi-110092

Profit & Loss Account for the year ended 31st March, 2020

(Amount in Rs.)

	Particulars	Note No	For the Year Ended March 31, 2020	For the Year Ended March 31, 2019
I	Revenue from operations (gross)	15	116,252,281	21,617,386
II	Other income	16	245,270	39,943
III	Total income (I + II)		116,497,551	21,657,329
IV	Expenses:			
	Cost of materials consumed		-	-
	Changes in inventories of finished goods and work-in-progress Excise	17	78,339,855	(25,282,042)
	Purchases		20,622,286	16,197,030
	Direct Expenses	18	-	-
	Employee benefits expense	19	228,500	181,166
	Finance costs	20	5,788,123	5,556,447
	Depreciation and amortisation expense Other expenses		-	-
	Administrator & Other expenses	21	11,316,455	25,898,813
	Contingent Provision for Standard Assets (@0.4% of outstanding standard assets as per RBI Notification)			35,702
	Total expenses		116,295,219	22,587,116
V	Profit/(loss) before exceptional item and tax (III-IV)		202,332	(929,787)
VI	Exceptional item (Prior Period (Expenses)/Income		(54,990)	900,000
VII	Profit/(loss) before tax (V-VI)		147,342	(29,787)
VIII	Tax-expense/(Credit):			
	-Current tax		38,309	-
	Less- MAT Credit Entitlement		-	-
	-Deferred tax		-	-
IX	Profit/(loss) for the year (VII-VIII)		109,033	(29,787)
X	Other Comprehensive income/(loss)			
	Item that will not be subsequently reclassified to profit or loss			
	(a) Re-measurement gains/(losses) on defined benefit obligations		-	-
	(b) Income tax effect		-	-
	Item that may be subsequently reclassified to profit or loss:			
	(a) Cash flow hedges		-	-
	(b) Income tax effect		-	-
	Total Other Comprehensive income/(loss) for the year		-	-
XI	Total Comprehensive income/(loss) for the year		109,033	(29,787)
XII.	Earnings/(loss) per equity share (of Rs. 1/- each)		0.0024	(0.0007)
	Basic and Diluted (in Rs. per share)			

See accompanying note nos. 1 to 25 forming part of the financial statements

In terms of our report attached of the even date

For And on Behalf of the Board
Sarnimal Investment Limited

For : Moon And Company
(Chartered Accountants)
Firm Reg. No. 024693N

Nitin Agarwal
(Managing Director)
DIN-03122245

Sudhir kumar Agarwal
(Director)
DIN-00024935

Megha Gupt
(C.S)
PAN:AMJPG3101D

Nitin Agarwal
(CFO)
PAN:AMWPA6693F

CA Moon Goel
(Partner)
M.No. 523034

Date : 10/07/2020
Place : New Delhi

Sarnimal Investment Limited
CIN NO. L65100DL1981PLC012431
439, Vikas Marg, Jagriti Enclave, Delhi-110092
Cash Flow Statement as on 31st March, 2020

(Amount in Rs.)

	Particulars	For the Year Ended March 31, 2020	For the Year Ended March 31, 2019
A.	Cash flow from operating activities	1,47,342.00	(29,786.70)
	Profit/(loss) before tax		
	Adjusted for :		
	Depreciation and amortisation expense	-	-
	Leasehold prepayments amortisation	-	-
	Interest income	-	-
	Finance cost	-	-
	Proceeds from long-term borrowings	-	(3,74,51,115.00)
	Gain on mark to market of investments	-	-
	(Profit)/loss on sale of property, plant and equipment (net)	-	-
	Net (gain)/loss on foreign currency transactions and translation	-	-
	Provision for Standard assets	-	-
	Deferred Government grant transferred	-	-
	Operating profit/(loss) before working capital changes	1,47,342.00	(3,74,80,901.70)
	Adjusted for :		
	(Increase)/Decrease in trade receivables	12,686.45	78,49,101.55
	(Increase)/Decrease in inventories	7,83,39,855.00	(2,52,82,042.00)
	(Increase)/Decrease in other assets	(3,59,027.00)	2,03,24,784.21
	Increase/(Decrease) in trade payables	(4,51,18,369.00)	4,41,12,969.00
	(Increase)/Decrease in Short Term loans & Advances	(16,11,782.00)	(89,26,163.00)
	Increase/(Decrease) in other liabilities	(12,39,683.00)	16,13,884.00
	Increase/(Decrease) in provisions		
	Cash generated from operations	3,00,23,680.45	3,96,92,533.76
	Net Income taxes (paid) / refunds	3,01,71,022.45	22,11,632.06
	Net cash from operating activities A	3,01,71,022.45	21,53,135.06
B.	Cash flow from investing activities		
	Capital expenditure on property, plant and equipments including capital advances	-	-
	Sale of property, plant and equipments	-	-
	Purchases of investments	(55,45,000.00)	-
	Sale of investments	-	-
	Loans and Advances	(2,48,74,941.00)	-
	Interest received	-	-
	Finance Cost	-	-
	Bank balances not considered as cash and cash equivalents	-	-
	-Deposits placed	-	-
	-Deposits matured	-	-
	Net cash used in investing activities B	(3,04,19,941.00)	-
C.	Cash flow from financing activities		
	Proceeds from long-term borrowings	-	-
	Proceeds from short term borrowings	-	-
	Repayment of long-term borrowings	-	-
	Repayment of short-term borrowings	-	-
	Interest and finance charges paid	-	-
	Net cash used in financing activities C	-	-
	Net (decrease) / increase in cash and cash equivalents A+B+C	(2,48,918.55)	21,53,135.06
	Cash and cash equivalents as at the beginning of the year	28,60,950.51	7,07,815.45
	Cash and cash equivalents as at the End of the year	26,12,031.96	28,60,950.51

See accompanying note nos. 1 to 25 forming part of the financial statements

In terms of our report attached of the even date

For And on Behalf of the Board
Sarnimal Investment Limited

For : Moon And Company
(Chartered Accountants)

Firm Reg. No. 024693N

Nitin Agarwal
(Managing Director)
DIN-03122245

Sudhir kumar Agarwal
(Director)
DIN-00024935

Megha Gupta
(C.S)
PAN:AMJPG3101D

Nitin Agarwal
(CFO)
PAN:AMWPA6693F

CA Moon Goel
(Partner)

Date : 10/07/2020

Place : New Delhi

M.No. 523034

Statement of Changes in Equity for the year ended March 31, 2020					
A Equity share capital					
	As at March 31, 2020		As at March 31, 2019		
	Numbers of shares	Rupees	Numbers of shares	Rupees	
As at April 1, 2018	4,49,80,000	4,49,80,000	4,49,80,000	4,49,80,000	
As at March 31, 2019	4,49,80,000	4,49,80,000	4,49,80,000	4,49,80,000	
As at March 31, 2020	4,49,80,000	4,49,80,000	4,49,80,000	4,49,80,000	
B Other equity					
Particulars	Reserve and Surplus				
	Reserve Fund	Retained Earnings	Debenture Redemption Reserve	General Reserve	Total reserves
Balance as at March 31, 2019	4,47,675	29,291	-	3,28,124	8,05,090
Profit for the year	-	1,09,033	-	-	1,09,033
Less: Reserve Fund @25% (as required by section 45-IC of RBI Act,1934)	36,836	(36,836)	-	-	-
Contingent Provision for Standard Assets (@ 0.4% of outstanding standard assets as per RBI Notification)	-	(99,441)	-	-	-
	4,84,511	2,047	-	3,28,124	8,14,682
Transferred (from)/to Reserve Fund	-	-	-	-	-
Transferred (from)/to Reserve Fund	-	-	-	-	-
Balance as at March 31, 2020	4,84,511	2,047	-	3,28,124	8,14,682

3. Summary of significant accounting policies.

a. Use of Estimates

In preparation of the financial statements, the Company makes judgments, estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and the associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The estimates and the underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognized in the period in which the estimate is revised and future periods affected.

b. Revenue Recognition

Revenue is recognized for amounts the Company expects to be entitled to in exchange for transferring promised goods and services to a customer excluding amounts collected on behalf of third parties e.g. sales tax.

Revenue from contracts with customers is recognized when the Company satisfies the performance obligation identified in the contract through transfer of control of the promised goods and services.

Contract with a customer is accounted for when all the following criteria are met:

- The parties to the contract have approved the contract and are committed to perform their respective obligations;
- Each party's rights regarding the goods or services to be transferred are identifiable;
- Payment terms for the goods or services to be transferred are identifiable;
- the contract has commercial substance (i.e. the risk, timing or amount of the entity's future cash flows is expected to change as a result of the contract); and
- It is probable that the entity will collect the consideration to which it is entitled in exchange for the goods or services that will be transferred to the customer.

Service income

Revenue from service transactions is usually recognized as the service is performed on conversion of customer's material by the percentage completion method. Processing charges include freight and packaging charges but are net of service tax.

Interest income

Interest income from a financial asset is recognized when it is probable that the economic benefits will flow to the Company and the amount of income can be measure reliably. Interest income is accrued on a time basis, by reference to the principal outstanding and the effective interest rate applicable which is the rate exactly discounts estimated future cash receipts through the expected life of the financial asset to that asset's net carrying amount on initial recognition.

Dividend income

Dividend income from investments is recognized when the shareholder's rights to receive payment have been established.

c) Inventories

Finished goods are valued at lower of cost or net realizable value. Net realizable value is the price at which the inventories can be realized in the normal course of business after allowing for the cost of conversion from their existing state to a finished condition and for the cost of marketing, selling and distribution.

d) Investments

Long-term investments are stated at cost. Provision for diminution in the value of long term investment is made only if, such a decline is other than temporary in the opinion of the management. The Current investments are stated at lower of cost or quoted/fair vale market value computed category wise

e) Fixed, Intangible Assets & Borrowing Cost

Fixed assets are stated at their original cost, less provision for impairment losses, if any, depreciation, amortization and adjustments on account of foreign exchange fluctuations in respect of change in rupee liability of foreign currency loans used for acquisition of fixed Assets.

f) Depreciation & Amortization

Depreciation on tangible assets is provided based on the useful life prescribed under Part C of schedule-II of Companies Act 2013. Accordingly the remaining life of assets are considered after adjusting already lapsed life of assets, from the life prescribed under the new companies Act. Accordingly depreciation calculated as per new provision.

g. Cash & Cash equivalent

Cash and cash equivalents comprise cash and cash or deposit with banks and corporations. The company considers all highly liquid investments with a remaining maturity at the date of purchase of three months or Less and that are readily convertible to know amounts of cash to be cash equivalents.

h. Employee Benefits

Company has complied with all labour laws.

I. Accounting for Taxes for Income

Deferred Tax: - Deferred tax is provided on timing differences between tax and accounting treatments that originate in one period and are expected to be reversed or settled in subsequent periods. Deferred tax assets and liabilities are measured using the enacted/substantively enacted tax rate for continuing operations. Adjustment of deferred tax liability attributable to change in tax rate is shown in the statement of profit and loss as a part of the deferred tax adjustment for the year.

(ii) There is no Intangible Assets.

(iii) The borrowing cost such as interest, processing fee etc. are recognized in accordance with principal laid down in the Accounting standard 16.

Cost of borrowing related to General borrowing is changed to profit/loss Account.

j.) Provisions and Contingent Liabilities

Provisions are recognized in the balance sheet when the Company has a present obligation (legal or constructive) as a result of a past event, which is expected to result in an outflow of resources embodying economic benefits which can be reliably estimated. Each provision is based on the best estimate of the expenditure required to settle the present obligation at the balance sheet date. When appropriate, provisions are measured on a discounted basis

Constructive obligation is an obligation that derives from an entity's actions where:

(a) by an established pattern of past practice, published policies or a sufficiently specific current statement, the entity has indicated to other parties that it will accept certain responsibilities; and

(b) As a result, the entity has created a valid expectation on the part of those other parties that it will discharge those responsibilities.

When some or all of the economic benefits required to settle a provision are expected to be recovered from a third party, a receivable is recognized as an asset if it is virtually certain that reimbursement will be received and the amount of the receivable can be measured reliably.

Contingent liabilities are not recognized but are disclosed in the notes. Contingent assets are neither recognized nor disclosed in the financial assets

k) Financial liabilities and equity instruments

Equity instruments

An equity instrument is any contract that evidences a residual interest in the assets of the Company after deducting all of its liabilities. Equity instruments are recorded at the proceeds received, net of direct issue costs.

Financial Liabilities

Trade and other payables are initially measured at fair value, net of transaction costs, and are subsequently measured at amortized cost, using the effective interest rate method. Interest-bearing bank loans, overdrafts and issued debt are initially measured at fair value and are subsequently measured at amortized cost using the effective interest rate method. Any difference between the proceeds (net of transaction costs) and the settlement or redemption of borrowings is recognized over the term of the borrowings in accordance with the Company's accounting policy for borrowing cost

DE recognition of financial liabilities

The Company derecognizes financial liabilities when, and only when, the Company's obligations are discharged, cancelled or they expire.

Derivative financial instruments and hedge accounting

In the ordinary course of business, the Company uses certain derivative financial instruments to reduce business risks which arise from its exposure to foreign exchange and interest rate fluctuations. The instruments are confined principally to forward foreign exchange contracts, cross currency swaps and interest rate swaps. The instruments are employed as hedges of transactions included in the accounts or for highly probable forecast transactions/ firm contractual commitments. These derivatives contracts do not generally extend beyond 12 months, except for certain interest rate swaps and cross currency interest rate swaps.

In cases where hedge accounting is not applied, changes in the fair value of derivatives are recognized in the Statement of Profit and Loss as they arise. Hedge accounting is discontinued when the hedging instrument expires or is sold, terminated, or exercised, or no longer qualifies for hedge accounting. At that time, any cumulative gain or

loss on the hedging instrument recognized in equity is retained in equity until the forecasted transaction occurs. If a hedged transaction is no longer expected to occur, the net cumulative gain or loss recognized in equity is transferred to the Statement of Profit and Loss for the period. Certain components, such as terms and conditions, embedded in financial instruments or other hosts contracts are accounted for as separate derivatives and carried at fair value. These components are separately accounted for when their risks and characteristics are not closely related to those of the host contract, the host contract itself is not carried at fair value with gains or losses reported in the Statement of Profit and Loss, and where a separate instrument with the same terms as the embedded component would itself meet the definition of a derivative.

Derivatives are initially accounted for and measured at fair value from the date the derivative contract is entered into and are subsequently re-measured to their fair value at the end of each reporting period. The fair

Values for forward currency contracts, interest rate swaps are marked to market at the end of each reporting period. The Company adopts hedge accounting for forward and interest rate contracts wherever possible.

At the inception of each hedge, there is a formal, documented designation of the hedging relationship. This documentation includes, inter alia, items such as identification of the hedged item or transaction and the

Nature of the risk being hedged. At inception each hedge is expected to be highly effective in achieving an offset of changes in fair value or cash flows attributable to the hedged risk. The effectiveness of hedge

Instruments to reduce the risk associated with the exposure being hedged is assessed and measured at the inception and on an ongoing basis. The ineffective portion of designated hedges are recognized immediately

In the Statement of Profit and Loss.

When hedge accounting is applied:

For fair value hedges of recognized assets and liabilities, changes in fair value of the hedged assets and liabilities attributable to the risk being hedged, are recognized in the Statement of Profit and Loss and Compensate for the effective portion the symmetrical changes in the fair value of the derivatives

1.) Earnings per Share

Basic earnings per share are computed by dividing profit or loss attributable to equity shareholders by the weighted average number of equity shares outstanding during the period. The Company did not have any Potentially dilutive securities in any of the periods presented.

For the purpose of calculation diluted EPS the net profit loss for the year attributable to equity shareholders and the weighted average number of shares outstanding during the period are adjusted for the effect of

All dilutive potential equity shares.

4 Other non-current assets			(Amount in ₹)
Particulars	As at March 31, 2020	As at March 31, 2019	
Unsecured, considered good			
Loan & Advances (from related parties)	8,114,856		
Loan & Advances (others)	101,041,948	84,281,863	
Total	109,156,804	84,281,863	
5 Inventories			
Particulars	As at March 31, 2020	As at March 31, 2019	
(a) Raw materials Goods-in transit	-	-	
(b) Work-in-progress Goods-in transit	-	-	
(c) Finished goods/ Traded goods	1,113,756	79,453,611	
		-	
Total	1,113,756	79,453,611	
6 Financial assets - current : Trade receivable			
Particulars	As at March 31, 2020	As at March 31, 2019	
Unsecured, considered good			
Trade receivable	(324)	12,362	
Total	(324)	12,362	
7 Financial assets - Current : Cash and cash equivalents			
Particulars	As at March 31, 2020	As at March 31, 2019	
Cash in hand	199,527	177,097	
Balances with banks *	2,412,505	2,683,853	
Total	2,612,032	2,860,951	
* Balance Subject to Reconciliation.			
8 Other Current Assets			
Particulars	As at March 31, 2020	As at March 31, 2019	
Unsecured, considered good			
Short term loans & Advances		-	
Balances with statutory/Government authorities	1,129,720	770,693	
Total	1,129,720	770,693	

9 Share capital				
Particulars	As at March 31, 2020		As at March 31, 2019	
	Number of Shares	Amount	Number of shares	Amount
(a) Authorised Share Capital				
Opening/Closing balance (500,00,000 equity shares of Rs 1 each)	50,000,000	50,000,000	50,000,000	50,000,000
TOTAL	50,000,000	50,000,000	50,000,000	50,000,000
(b) Issued, subscribed and fully Paid up				
Opening/Closing balance (449,80,000 equity shares of Rs 1 each)	44,980,000	44,980,000	44,980,000	44,980,000
TOTAL	44,980,000	44,980,000	44,980,000	44,980,000
Name of Shareholder				
10 Reserve & Surplus				
Particulars	As at March 31, 2020		As at March 31, 2019	
	Amount		Amount	
a) General Reserve		328,124		328,124
A				
b) Reserve Fund (as required by section 45-IC of RBI Act,1934)				
Op. Balance		447,675		447,675
Add,- Current year Transfer		27,258		-
B		474,933		447,675
c) Surplus of profit & Loss account				
Op. Balance		29,291		59,078
Current years profit & loss account		109,033		(29,787)
		138,324		29,291
Less: Reserve Fund @25% (as required by section 45-IC of RBI Act,1934)		(27,258)		-
Less: Contingent Provision for Standard Assets (@ 0.4% of outstanding standard assets as per RBI Notification)		(99,441)		-
C		11,625		29,291
Grand Total A+B+C		814,682		805,090

(Amount in ₹)

11 Trade payables		
Particulars	As at March 31, 2020	As at March 31, 2019
MSME	-	-
Others	-	45,118,369
Total	-	45,118,369
12 Financial liabilities - Current : Other financial liabilities		
Particulars	As at March 31, 2020	As at March 31, 2019
Dues to related parties (refer note 25)	72,082,583	73,694,365
Deposits from vendors and others	-	-
Others	-	-
Total	72,082,583	73,694,365
13 Other Current liabilities		
Particulars	As at March 31, 2020	As at March 31, 2019
TDS Payable	589,383	859,553
Salary Payable	-	128,000
Audit Fee Payable	18,000	18,000
Expences Payable	15,000	65,504
Others	639,421	1,430,430
Total	1,261,804	2,501,487
14 Provisions		
Particulars	As at March 31, 2020	As at March 31, 2019
Provision for Income Tax	38,309	-
Contingent Provision on Standard Assets	436,565	337,124
Total	474,874	337,124

15 Revenue from operations		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
Sale of products (gross)	109,042,166	14,337,805
Interest Income	7,210,115	7,279,581
Revenue from operation (gross)	116,252,281	21,617,386
16 Other income		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
Interest on IT refund	20,517	8,443
Dividend Received	9,753	-
Other Income	215,000	
Amount Wo	-	31,500
Total	245,270	39,943
17 Changes in inventories of finished goods and work-in-progress		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
Opening inventories Finished goods Work in progress By products	79,453,611	54,171,569
Closing inventories Finished goods Work in progress By products	1,113,756	79,453,611
Total	78,339,855	(25,282,042)
18 Employee benefits expense		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
(a) Salaries and wages	228,500	176,166
(c) Staff welfare expenses	-	5,000
Total	228,500	181,166
19 Finance cost		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
Interest expense	5,788,123	5,556,447
Total	5,788,123	5,556,447

20 Other expenses		
Particulars	For the Year Ended	
	March 31, 2020	March 31, 2019
Advertisement Expenses	31,320	34,013
AGM expenditure	79,448	58,570
Auditors fee	18,000	18,000
CDSL	24,000	24,000
Bank Charges	4,720	7,670
Legal & Professional Fee	7,000	-
Loss From Future and Trading	10,766,727	25,146,745
Listing Fee	55,000	59,000
Demat Charges	9,500	10,849
General Expences	15,890	25,800
ROC fee	19,800	13,800
STT (Share Transfer Expenses)	255,643	448,896
Misc. Expenditure	-	7,500
Printing & stationery	5,890	23,950
Website Maintenance	3,717	4,130
Telephone Expences	2,800	890
DP Charges	2,000	-
Secretarial exp	15,000	15,000
Total	11,316,455	25,898,813

21. Contingent Liabilities and commitments		
Particulars	Year ended March 31, 2020	Year ended March 31, 2019
Guarantee given by bank	Nil	Nil
Income Tax matter in dispute	Nil	Nil

22. Obligation & Commitments outstanding		
Particulars	Year ended March 31, 2020	Year ended March 31, 2019
a). Estimated Value of contracts remaining to be executed	Nil	Nil
b). Bill Discounted with Bank	Nil	Nil

22.a). The response to letters sent by the Company requesting confirmation of balances has been insignificant. In the management's opinions, adjustment on reconciliation of the balances, if any required, will not be material in relation to the financial statements of the company and the same will be adjusted in the financial statements as and when the confirmations are received and reconciliations are completed.

b). Inventories, loans & advances, trade receivables and other current / non-current assets are reviewed annually and in the opinion of the management do not have a value on realization in the ordinary course of business, less than the amount at which they are stated in the balance sheet.

c) The company operates in a two type of business i.e. Income from Shares & Interest Income and single geographical segment i.e. with in India Accordingly no separate disclosures for primary Business and Second Geographical segment are required

23. Payments to auditors	For the Year Ended	
	March 31, 2020	March 31, 2019
As Auditor - for statutory audit and limited review For other services	18,000	18,000
Total	18,000	18,000

24. Earnings per share (EPS)

Particulars	March 31, 2020	March 31, 2019
Net profit/(loss) after tax for the year (Rs)	109,033.08	(29787)
Weighted number of ordinary shares for basic EPS	44,980,000	44,980,000
Nominal value of ordinary share (in Rs. per share)	1	1
Basic and Diluted earnings for ordinary shares (in Rs. per	0.00	(0.0007)

25. RELATED PARTY DISCLOSURES

A Names of related parties and description of relation :

(i) Holding companies: NIL

(ii) Subsidiary companies : NIL

(iii) Related Parties Other than Holding Companies with whom transactions have taken place during the year

(a) Fellow subsidiaries :NIL

(b) Other related parties

Abhinav Leasing And Finance Ltd., Aglow Financial Services Pvt Ltd, Samimal Investment Limited, MIDAS Global Securities Ltd, Sudhir Agarwal & Associates, Svam Software Limited, Avika Developers Pvt Ltd, Chrishmatic Developer Private Ltd, Shridhar Financial Services Limited

(iv) Key Management Personal : Mr Sudhir Kumar Agarwal, Payal Agarwal, Amit Aggarwal , Nitin Agarwal, Nikhil Bansal, Ambika Agarwal, Megha Gupta

B Transactions with related parties

For the year ended March 31, 2020

Particulars	Relation	31-Mar-20	31-Mar-19
Interest expense			
Tridev Infraestates Limited	Director Interested	-	-
Midas Commodities Pvt Ltd	Director Interested		10,92,000
Salora Capital Limited	Director Interested	7,809	4,15,252
Shiney Buildwell Pvt Ltd	Director Interested	-	2,75,262
Shridhar Financial Services Limited	Director Interested	2,46,301	5,78,692
Aglow Fiancial Services Pvt Ltd	Director Interested	46,52,077	27,45,553
Avika Developers Pvt Ltd	Director Interested	8,81,936	-
Svam Software limited	Director Interested	-	4,49,688
Interest Income			
Abhinav Leasing & Finance Ltd	Director Interested	2,21,200	83,534
Jolly Plastic Industries Ltd	Director Interested	438	3,93,773
Avika Developers Pvt Ltd	Director Interested	-	1,23,511
Svam Software limited	Director Interested	942	-

Particulars	Relation	31-Mar-20	31-Mar-19
Amount paid during the year			
Salora Capital Limited	Director Interested	-	4,61,82,077
Abhinav Leasing & Finance Ltd	Director Interested	89,98,999	53,31,819
Jolly Plastic Industries Ltd	Director Interested	6,40,000	1,05,00,000
Svam software Limited	Director Interested	50,000	-
Total		9,70,54,206	14,33,18,313

Amount taken during the year			
Salora Capital Limited	Director Interested	1,42,92,972.00	-
Midas global securities pvt ltd	Director Interested	1,50,15,000.00	-
Midas Commodities Pvt Ltd	Director Interested	-	37,00,000
Shiney Buildwell Pvt Ltd	Director Interested	-	65,00,000
Shridhar Financial Services Limited	Director Interested	-	8,36,60,000
Aglow Fiancial Services Pvt Ltd	Director Interested	2,06,35,906	10,67,92,000
Svam Software limited	Director Interested	-	98,00,000
Chrismatic Developers Pvt Ltd	Director Interested	-	7,00,000.00
Tridev InfraEstates Ltd	Director Interested	-	4,00,000.00
Sai Baba Finvest Ltd.	Director Interested	6,19,00,000	53,61,160
Total		11,18,43,878	31,76,67,030
Particulars			
Nature			
Sale & Purchase			
Midas Global Securities Ltd		Purchase	
Tridev Intrastates Limited		Sale Purchase Transaction	
Midas Global Securities Ltd		Sale	
Particulars			
Relation			
March 31, 2020			
March 31, 2019'			
Amount Recovered			
Salora Capital Limited	Director Interested		4,81,73,727
Shiney Buildwell Pvt Ltd	Director Interested	-	1,97,36,236
Abhinav Leasing & Finance Ltd	Director Interested	80,88,801	99,84,967
Jolly Plastic Industries Ltd	Director Interested	6,40,000	1,80,34,366
Total		87,28,801	9,59,29,296
Particulars			
Relation			
March 31, 2020			
March 31, 2019'			
Amount Repaid			
Midas Commodities Pvt Ltd	Director Interested	96,99,706	39,00,000
Salora Capital Limited		1,42,92,972	
Shridhar Financial Services Limited	Director Interested	95,77,791	7,13,70,000
Midas Global Securities Ltd		50,15,000	
Aglow Fiancial Services Pvt Ltd	Director Interested	8,73,54,500	7,35,00,000
Svam Software limited	Director Interested		76,55,772
Chrismatic Developers Pvt Ltd	Director Interested	-	7,00,000
Shiny Buildwell Pvt Ltd	Director Interested	-	1,97,36,236
Avika Developers Pvt. Ltd.	Director Interested	61,90,000	53,61,160
Total		13,21,29,969	18,22,23,168
Particulars			
Relation			
March 31, 2020			
March 31, 2019'			
Balance outstanding at the year end			
Amount Payable			
Aglow Financial Services Pvt Ltd	Director Interested	-	5,44,16,868
Midas Commodity Pvt Ltd	Director Interested		96,99,706
Shridhar Financial Services Limited	Director Interested		95,77,791
Avika Developers Pvt Ltd	Director Interested	5,65,03,742	-
Tridev Infraestates Limited	Director Interested		1,84,76,587
Midas Global Securities Ltd	Director Interested	1,00,00,000	-
Jolly Plastic Industries Ltd	Director Interested	55,78,840	-
Midas Global Securities Ltd	Director Interested	324	-
Amount Receivable			
Aglow Financial Services Pvt Ltd	Director Interested	81,14,857	-
Midas Global Securities Ltd	Director Interested	-	12,362.45

Notes Forming Part Of Balance sheet

1. COMPANY OVERVIEW

The Company was originally incorporated with name "Sarnimal Investment Private Limited" and the Certificate of Incorporation was granted by the Registrar of Companies, NCT of Delhi & Haryana on 30th September, 1981 vide registration No.012431.

Subsequently, the Status of the Company was changed from Private Limited to Public Limited vide fresh Certificate of Incorporation dated 9th December, 1981, issued by Registrar of Companies, NCT of Delhi and Haryana.

Consequently the name of the Company has been changed from "Sarnimal Investment Private Limited" to "Sarnimal Investment Limited". The CIN of the Company L65100DL1981PLC012431.

Sarnimal Investment Limited is a Non Banking Financial Company (NBFC) under the category B (NBFC not accepting Public Deposits). The Company obtained its Certificate of Registration from RBI to carry on the business of non-banking financial institution on 02nd November, 2000. The Registration no. of the Company with RBI is B-14.02077. At present, the Company is carrying on activities of NBFC. The main business of the Company is to carry on the business of financiers (not amounting to banking business) by way of lending and advancing money to industrials, commercials and other enterprises.

The shares of the Company are presently listed at the MCX Stock Exchange Limited and Delhi Stock Exchange Limited. The Company got its shares listed with Delhi Stock Exchange Limited in the Financial Year 1982-83 when it came with Initial Public Offer inviting public to subscribe for its shares. The IPO of the Company was successful.

Further Company got its shares listed with MCX Stock Exchange Limited w.e.f 12th January, 2015

2. BASIS OF PREPARATION OF FINANCIAL STATEMENTS

a) Basis of preparation and compliance with Ind AS

(i) For all periods upto and including the year ended March 31, 2020, the Company prepared its financial statements in accordance with Generally Accepted Accounting Principles (GAAP) in India and complied with the accounting standards (Previous GAAP) as notified under Section 133 of the Companies Act, 2013 read together with Rule 7 of the Companies (Accounts) Rules, 2014, as amended, to the extent applicable, and the presentation requirements of the Companies Act, 2013.

In accordance with the notification dated February 16, 2015, issued by the Ministry of Corporate Affairs, the Company has adopted Indian Accounting Standards (Ind AS) notified under Section 133 read with Rule 4A of Companies (Indian Accounting Standards) Rules, 2015, as amended, and the relevant provisions of the Companies Act, 2013 (collectively, "Ind ASs") with effect from April 1, 2018 and the Company is required to prepare its financial statements in accordance with Ind ASs for the year ended March 31, 2018. These financial statements as and for the year ended March 31, 2018 (the "Ind AS Financial Statements") was the first financial statements, the Company has prepared in accordance with Ind AS.

The management of the Company has compiled the Special Purpose Comparative Ind AS Financial Statements using the Audited Previous GAAP Financial Statements and made required Ind AS adjustments. The Audited Previous GAAP Financial Statements, and the Special purpose Comparative Ind AS Financial Statements, do not reflect the effects of events that occurred subsequent to the respective dates of approval of the Audited Previous GAAP Financial Statements.

(iv) These financial statements were approved for issue by the Board of Directors on July 10, 2020.

b) **Basis of measurement**

The Ind AS Financial Statements have been prepared on a going concern basis using historical cost convention and on an accrual method of accounting, except for certain financial assets and liabilities, including derivative.

