

# Supra Industrial Resources Limited

CIN: L65999DL1985PLC019987

REGD.OFFICE: E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex,  
Near By- Dhobi Ghat, East Delhi, Delhi 110092

Tel: +91- 9594924487

Email: suprail1985@gmail.com

September 6, 2025

To,

Head, Listing Compliance Department

Metropolitan Stock Exchange of India Limited

Building A, Unit 205(A), 2nd Floor Piramal

Agastya Corporate Park Kamani Junction,

LBS Road Kurla (West), Mumbai – 400070

Symbol: SUPRAIND

**Sub.:** Annual Report of the Company for Financial Year 2024-25.

**Ref.:** Regulation 34(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Ma'am,

Pursuant to Regulation 34(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Report of the Company alongwith the Notice of the 40th Annual General Meeting of the Company and other Statutory Reports for FY 2024-25.

The Annual Report for FY 2024-25 is being made available on the website of the Company at

<https://www.supraindustrialresources.in>

The aforesaid advertisements are being submitted for your kind information and records.

Thanking You,

For Supra Industrial Resources Limited

Pooja Ramji Shukla

(Additional Director)

DIN: 10811012

Encl.: As above

# **SUPRA INDUSTRIAL RESOURCES LIMITED**

CIN-L65999DL1985PLC019987

REGISTERED OFFICE: E-91-A First Floor, Old-No-91.  
Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat  
East Delhi, Delhi India, 110092

**E-mail:** [suprairl1985@gmail.com](mailto:suprairl1985@gmail.com)

Website: [www.supraindustrialresources.in](http://www.supraindustrialresources.in)

Phone: 091- 9594924487

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40<sup>th</sup>

**ANNUAL REPORT**

**2024-25**

## **BOARD OF DIRECTORS**

Mr. Lokesh Devendra Kothari	Non-Executive & Independent Director (Appointed w.e.f. 25/06/2024)
Mrs. Pooja Ramji Shukla	Non-Executive & Non-Independent) (Appointed w.e.f. 07/11/2024)
Mr. Bhavin Shashikant Khona	Executive & Non-Independent Director (Appointed w.e.f. 14/11/2024)
Mr. Sagar Shashikant Khona	Executive & Non-Independent Director (Appointed w.e.f. 14/11/2024)
Mrs. Kinjal Khona	Non-Executive & Non-Independent Director (Appointed w.e.f. 14/11/2024) (Ceased w.e.f. 04/09/2025)
Mrs. Nidhi Khona	Non-Executive & Non-Independent Director (Appointed w.e.f. 14/11/2024) (Ceased w.e.f. 04/09/2025)
Mr. Subrata Nath	Non-Executive & Non-Independent) (Appointed w.e.f. 19/03/2025)
Mr. Manoj Rambilas Jaisval	Non-Executive & Independent Director (Appointed w.e.f. 01/08/2025)
Mr. Nadeem Naeemuddin Shaikh	Non-Executive & Independent Director (Appointed w.e.f. 01/08/2025)
Mr. Rajat Agarwal	Executive & Non-Independent Director (Ceased w.e.f. 14/11/2024)
Mr. Vivek Kumar	Non-Executive & Non-Independent Director (Ceased w.e.f. 26/06/2024)
Mrs. Tanu Jaiswal	Non-Executive & Independent Director (Ceased w.e.f. 14/11/2024)
Mr. Rajat Agarwal	CFO
Mr. Rajat Agarwal	CEO

### **Company Secretary & Compliance Officer**

Ms. Vanshita Sharma	Ceased w.e.f. 07/11/2024
Ms. Radhika Mishra	Appointed w.e.f. 20/06/2025

## **AUDITORS**

### **Statutory Auditor**

M/s Sweta Jain & Co.  
Chartered Accountants  
HO-G/007, Om Sai Enclave,  
Near Gracious School  
Poonam Sagar Complex, Mira Road (E),  
Thane Maharashtra

### **Secretarial Auditor**

M/s Bharat Khaniwal & Co.  
Compnay Secretaries  
P. No. 44 Prem Sagar,  
Bhankrota, Jaipur  
302026 Rajasthan

**INTERNAL AUDITOR**

M/s. Gaurav Hirawat & Associates

**INVESTORS HELPDESK & EMAIL**

E-mail: [suprail1985@gmail.com](mailto:suprail1985@gmail.com)

WEBSITE: [www.supraindustrialresources.in](http://www.supraindustrialresources.in)

**STOCK EXCHANGES**

Metropolitan Stock Exchange of India Limited

**REGISTRARS & TRANSFER AGENTS**

Skyline Financial Services (P) Limited,  
D-153 A, First Floor, Okhla Industrial Area,  
Phase – I, New Delhi-110020.

Phones: 011-40450193-197      Web: [skylinerta.com](http://skylinerta.com)

# **SUPRA INDUSTRIAL RESOURCES LIMITED**

Registered Office: E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat East Delhi, Delhi India, 110092

CIN: L65999DL1985PLC019987; Website: [www.supraindustrialresources.in](http://www.supraindustrialresources.in)

E-mail: [supral985@gmail.com](mailto:supral985@gmail.com), [suprail1985@gmail.com](mailto:suprail1985@gmail.com)

Phone: 091-9594924487

## **NOTICE OF 40<sup>th</sup> ANNUAL GENERAL MEETING**

NOTICE IS HEREBY GIVEN that the **Fortieth Annual General** Meeting of Supra Industrial Resources Limited will be held at the Registered office of the Company at E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat East Delhi, Delhi India, 110092 on Tuesday, **the 30<sup>th</sup> day of September, 2025 at 3:30 P.M. (IST)** to transact the following business:

### **ORDINARY BUSINESS:**

1. **To consider and adopt the audited standalone financial statement of the Company for the financial year ended on March 31, 2025 and the reports of the Board of Directors and Auditors thereon and in this regard, to consider and if thought fit, to pass, with or without modification(s), the following resolution as Ordinary Resolution:**

**“RESOLVED THAT** the audited standalone financial statement of the Company for the financial year ended on March 31, 2025 and the report of the Board of Directors and Auditors thereon, as circulated to the members, be and are hereby considered and adopted.”

2. **To re-appoint Mrs. Pooja Ramji Shukla, who retires by rotation as a Director and in this regard, to consider and if thought fit, to pass, with or without modification(s), the following resolution as an Ordinary Resolution:**

**“RESOLVED THAT** in accordance with the provisions of Section 152 and other applicable provisions of the Companies Act, 2013, Mrs. Pooja Ramji Shukla (DIN: 10811012), who retires by rotation at this meeting be and is hereby appointed as a Director of the Company.”

3. **To Appoint of M/s Shweta Jain & Co., Chartered Accountant As Statutory Auditor**

*To appoint M/s Shweta Jain & Co., Chartered Accountant as Statutory Auditor and to fix their remuneration and for the purpose to consider and if, thought fit, to pass with or without modification(s), the following Ordinary Resolution thereof:*

**“RESOLVED THAT** pursuant to the provisions of sections 139, 142 and other applicable provisions, if any, of the Companies Act, 2013, read with the Companies (Audit and Auditors) Rules, 2014, (including any statutory modification(s), amendment(s) or re-enactment(s) thereof for the time being in force), as may be applicable **M/s Shweta Jain & Co., Chartered Accountant, (ICAI Firm Registration Number 127673W)** be and are hereby appointed as the Statutory Auditors of the Company to hold office for a term of 5 (five) years, from the conclusion of this **40th Annual General Meeting (2024-25) until the conclusion of the 45th Annual General Meeting** of the Company to be held in the year **(2029-30)** on such remuneration plus service taxes, out-of-pocket expenses, etc. as may be mutually agreed upon by the Board of Directors and the Auditors.

**RESOLVED FURTHER THAT** approval of the Company be and is hereby accorded to the Board of Directors of the Company to do all such acts, deeds, matters and things and to take all such

steps as may be required in this connection including seeking all necessary approvals to give effect to this Resolution and to settle any questions, difficulties or doubts that may arise in this regard.”

## **SPECIAL BUSINESS**

### **ITEM NO.4**

#### **To change in designation of Mr. Bhavin Shashikant Khona (DIN: 10222583) as a Whole Time Director of the Company.**

*To consider and, if thought fit, to pass with or without modification(s), the following resolution as Special Resolution:*

“**RESOLVED THAT** pursuant to the provisions of Sections 149, 152, 196, 197, 198 and 203 and other applicable provisions of Companies Act, 2013, the rules made thereunder read with Schedule V of the Act and Securities and Exchange Board of India (Listing Obligations Disclosure Requirements) Regulations, 2015 (including any statutory modifications or re-enactment thereof for the time being in force), Mr. Bhavin Shashikant Khona (DIN: 10222583) who was appointed as an Executive Director cum Additional Director of the Company by the Board of Directors, with effect from 14th November, 2024 in terms of Section 161, 196, 197 and 203 of the Companies Act, 2013 and who holds office up to the date of this Annual General Meeting of the Company in terms of, be and is hereby accorded in 40th Annual General Meeting by way of Special Resolution to appoint as Whole Time Director not liable to retire by rotation, for a term of 5 (five) consecutive years to hold office from the ensuing AGM.

**RESOLVED FURTHER THAT** any of the Director of Company for the time being be and is hereby severally authorized to sign and execute all such documents and papers (including appointment letter etc.) as may be required for the purpose and file necessary e-form with the Registrar of Companies and to do all such acts, deeds and things as may considered expedient and necessary in this regard.”

### **ITEM NO. 5**

#### **To regularize the additional director of Mr. Sagar Shashikant Khona (DIN: 10222584) as a Non-Executive & Non-Independent Director of the Company.**

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

“**RESOLVED THAT** pursuant to the provisions of Sections 161, 203 read with Schedule V and other applicable provisions of Companies Act, 2013, and Securities and Exchange Board of India (Listing Obligations Disclosure Requirements) Regulations, 2015 (including any statutory modifications or re-enactment thereof for the time being in force) and in accordance with the recommendation of Nomination and Remuneration Committee, Mr. Sagar Shashikant Khona (DIN: 10222584), who were appointed as an Additional Director, designated as Non-Executive Non-Independent Director of the Company with effect from 14<sup>th</sup> November, 2024, approval of the members be and is hereby accorded to appoint Mr. Sagar Shashikant Khona (DIN:10222584), or a term of 5 (five) years the period of his office shall be liable to retire by rotation, on the terms and conditions and remuneration as follows, with liberty to the Board of Directors (hereinafter referred to as “the Board” which term shall include the Nomination and Remuneration Committee

of the Board) to alter and vary the terms and conditions of the said appointment and / or remuneration as it may deem fit.

**RESOLVED FURTHER THAT** any of the Directors for the time being be and are hereby severally authorized to sign and execute all such documents and papers (including appointment letter etc.) as may be required for the purpose and file necessary e-form with the Registrar of Companies and to do all such acts, deeds and things as may considered expedient and necessary in this regard.

**RESOLVED FURTHER THAT** any one of the Directors for the time being be and are hereby severally authorized to sign the certified true copy of the resolution of the resolution to be given as and when required.”

**ITEM NO. 6**

**To regularize the additional director Mrs. Pooja Ramji Shukla (DIN: 10811012) as a Non-Executive Non-Independent Director of the Company.**

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

“**RESOLVED THAT** pursuant to the provisions of Sections 161, 203 read with Schedule V and other applicable provisions of Companies Act, 2013, and Securities and Exchange Board of India (Listing Obligations Disclosure Requirements) Regulations, 2015 (including any statutory modifications or re-enactment thereof for the time being in force) and in accordance with the recommendation of Nomination and Remuneration Committee, Mrs. Pooja Ramji Shukla (DIN: 10811012),, who were appointed as an Additional Director, designated as Non-Executive Non-Independent Director of the Company with effect from 7th November, 2024, approval of the members be and is hereby accorded to appoint Mrs. Pooja Ramji Shukla (DIN: 10811012), for a term of 5 (five) years the period of his office shall be liable to retire by rotation, on the terms and conditions and remuneration as follows, with liberty to the Board of Directors (hereinafter referred to as “the Board” which term shall include the Nomination and Remuneration Committee of the Board) to alter and vary the terms and conditions of the said appointment and / or remuneration as it may deem fit.”

**RESOLVED FURTHER THAT** any of the Directors for the time being be and are hereby severally authorized to sign and execute all such documents and papers (including appointment letter etc.) as may be required for the purpose and file necessary e-form with the Registrar of Companies and to do all such acts, deeds and things as may considered expedient and necessary in this regard.

**RESOLVED FURTHER THAT** any one of the Directors for the time being be and are hereby severally authorized to sign the certified true copy of the resolution of the resolution to be given as and when required.”

**ITEM NO. 7**

**To regularize the additional director Mr. Subrata Nath (DIN: 11005851) as a Non-Executive Non-Independent Director of the Company.**

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

**“RESOLVED THAT** pursuant to the provisions of Sections 161, 203 read with Schedule V and other applicable provisions of Companies Act, 2013, and Securities and Exchange Board of India (Listing Obligations Disclosure Requirements) Regulations, 2015 (including any statutory modifications or re-enactment thereof for the time being in force) and in accordance with the recommendation of Nomination and Remuneration Committee, Mr. Subrata Nath (DIN: 11005851),, who were appointed as an Additional Director, designated as Non-Executive Non-Independent Director of the Company with effect from 19th March, 2025, approval of the members be and is hereby accorded to appoint Mr. Subrata Nath (DIN: 11005851), for a term of 5 (five) years the period of his office shall be liable to retire by rotation, on the terms and conditions and remuneration as follows, with liberty to the Board of Directors (hereinafter referred to as “the Board” which term shall include the Nomination and Remuneration Committee of the Board) to alter and vary the terms and conditions of the said appointment and / or remuneration as it may deem fit.”

**RESOLVED FURTHER THAT** any of the Directors for the time being be and are hereby severally authorized to sign and execute all such documents and papers (including appointment letter etc.) as may be required for the purpose and file necessary e-form with the Registrar of Companies and to do all such acts, deeds and things as may considered expedient and necessary in this regard.

**RESOLVED FURTHER THAT** any one of the Directors for the time being be and are hereby severally authorized to sign the certified true copy of the resolution of the resolution to be given as and when required.”

#### **ITEM NO. 8**

#### **To regularize the additional director of Mr. Nadeem Naeemuddin Shaikh (DIN: 11222637) as a Non- Executive Independent Director of the Company.**

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

**“RESOLVED THAT** pursuant to the provisions of Section 149, 152, 160 and other applicable provisions, if any, of the Companies Act, 2013 (the “Act”), and Rules made thereunder, Regulation 16, 25, 17 (1C) and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 (including any statutory modification(s) or re-enactment thereof for the time being in force), the Articles of Association of the Company, based on recommendation of the Nomination and remuneration Committee, Mr. Nadeem Naeemuddin Shaikh (DIN: 11222637) who was appointed as an Additional Director (Non-Executive /Independent Director) of the Company with effect from 1st August 2025 and who, holds office upto the date of ensuing Annual General Meeting under Section 161 of the Act and who has submitted a declaration that he meets criteria of Independence as provided under the Act and the Listing Regulations, and in respect of whom the Company has received a notice in writing from him signifying his intention to propose himself as a candidate for the office of a Director of the Company, be and is hereby appointed as Non-Executive /Independent Director of the Company and shall not be liable to retire by rotation.

**RESOLVED FURTHER THAT** any Director be and is hereby authorized to sign and file required e-forms with Registrar of Companies and to do all acts, deeds, matters and things may be deemed necessary, proper or expedient for the purpose of giving effect to this resolution and for matters connected therewith or incidental thereto.”

#### **ITEM NO. 9**

#### **To regularize the additional director of Mr. Manoj Rambilas Jaisval (DIN: 11222638) as Non- Executive Independent Director of the Company.**

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

**“RESOLVED THAT** pursuant to the provisions of Section 149, 152, 160 and other applicable provisions, if any, of the Companies Act, 2013 (the “Act”), and Rules made thereunder, Regulation 16, 25, 17 (1C) and other applicable provisions of the Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015 (including any statutory modification(s) or re-enactment thereof for the time being in force), the Articles of Association of the Company, based on recommendation of the Nomination and remuneration Committee, Mr. Manoj Rambilas Jaisval (DIN: 11222638) who was appointed as an Additional Director (Non-Executive /Independent Director) of the Company with effect from 1st August 2025 and who, holds office upto the date of ensuing Annual General Meeting under Section 161 of the Act and who has submitted a declaration that he meets criteria of Independence as provided under the Act and the Listing Regulations, and in respect of whom the Company has received a notice in writing from him signifying his intention to propose himself as a candidate for the office of a Director of the Company, be and is hereby appointed as Non- Executive /Independent Director of the Company and shall not be liable to retire by rotation.

**RESOLVED FURTHER THAT** any Director be and is hereby authorized to sign and file required e-forms with Registrar of Companies and to do all acts, deeds, matters and things may be deemed necessary, proper or expedient for the purpose of giving effect to this resolution and for matters connected therewith or incidental thereto.”

#### **ITEM NO. 10**

#### **To appoint M/s. Bharat Khaniwal & Co, Practicing Company Secretaries as Secretarial Auditor for period of five consecutive years commencing from financial year 2025-26 and ending on financial year 2029-30**

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

**“RESOLVED THAT** pursuant to provisions of Sections 204 and 179(3) of the Companies Act, 2013 read with the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 framed thereunder, Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (including any statutory modification(s), re-enactment thereof for time being in force) and circulars issued thereunder from time to time, approval of the members of the Company be and is hereby accorded for the appointment of M/s. Bharat Khaniwal & Co., Company Secretaries (Unique Code Number - S2025RJ10262000) as the Secretarial Auditors for the Company, to hold office for a term of five consecutive years i.e. from financial year 2025-26 to financial year 2029-30, on such remuneration as may be mutually agreed between the Board of Directors and the Secretarial Auditors.

**RESOLVED FURTHER THAT** the Board or any duly constituted Committee of the Board, be and is hereby authorised to do all acts, deeds, matters and things as may be deemed necessary and/or expedient in connection therewith or incidental thereto, to give effect to the foregoing resolution."

**By Order of the Board  
For Supra Industrial Resources Limited**

**Date: 04/09/2025  
Place: New Delhi**

**Sd/-  
(Pooja Ramji  
Shukla)  
(Additional Director)  
DIN: 10811012**

## **NOTES:**

1. The Explanatory Statement pursuant to Section 102 of the Companies Act, 2013 and Regulation 36(5) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015, is annexed hereto.
2. The Register of Members and the Share Transfer books of the Company will remain closed from Wednesday 24th September, 2025 to Tuesday 30th September, 2025 both days inclusive.
3. National Securities Depository Limited, ("NSDL") will be providing facility for voting through remote e-Voting, for voting in the 40<sup>th</sup> AGM and e-Voting during the 40<sup>th</sup> AGM.
4. NSDL e-Voting System – For e-voting and Joining Virtual meetings.
5. In accordance with the Ministry of Corporate Affairs (MCA), General Circular Nos. 14/2020 dated: April 08, 2020, 17/2020, dated: April 13, 2020, 20/2020 dated May 5, 2020, 02/2022 dated May 5, 2022, 10/2022 dated December 28, 2022 and General Circular No. 09/2023 dated September 25, 2023 and September 19, 2024 issued by (MCA Circulars) and circular dated May 12, 2020, May 13, 2022, January 5, 2023 and circular dated October 07, 2023, issued by the Securities and Exchange Board of India providing relaxations to the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Circulars") and any other applicable laws and regulations, holding of the Annual General Meeting ("AGM") through VC / OAVM, without the physical presence of the Members at a common venue. In compliance with the MCA Circulars and SEBI Circulars, the AGM of the Members of the Company is being held through VC / OAVM. The registered office of the Company shall be deemed to be the venue for the AGM.

Corporate Members/ Institutional Investors (i.e. other than individuals, HUF's, NRI's, etc.) who are intending to appoint their authorized representatives pursuant to Sections 112 and 113 of the Act, as the case may be, to attend the AGM are requested to send a duly certified copy of the Board Resolution to [suprair1985@gmail.com](mailto:suprair1985@gmail.com).

6. Pursuant to the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014 (as amended) and Regulation 44 of SEBI (Listing Obligations & Disclosure Requirements) Regulations 2015 (as amended), and MCA Circulars dated April 08, 2020, April 13, 2020 and May 05, 2020 the Company is providing facility of remote e-voting to its Members in respect of the business to be transacted at the AGM. For this purpose, the Company has entered into an agreement with National Securities Depository Limited (NSDL) for facilitating voting through electronic means, as the authorized e-Voting's agency. The facility of casting votes by a member using remote e-voting as well as the e-voting system on the date of the AGM will be provided by NSDL.
7. The Members can join the AGM in the VC/OAVM mode 15 minutes before and after the scheduled time of the commencement of the Meeting by following the procedure mentioned in the Notice. The facility of participation at the AGM through VC/OAVM will be made available to at least 1000 members on first come first served basis. This will not include large Shareholders (Shareholders holding 2% or more shareholding), Promoters, Institutional Investors, Directors, Key Managerial Personnel, the Chairpersons of the Audit Committee, Nomination and Remuneration Committee and Stakeholders Relationship Committee, Auditors etc. who are allowed to attend the AGM without restriction on account of first come first served basis.
8. The attendance of the Members attending the AGM through VC/OAVM will be counted for the purpose of ascertaining the quorum under Section 103 of the Companies Act, 2013.
9. Pursuant to MCA Circular No. 14/2020 dated April 08, 2020, the facility to appoint proxy to attend and cast vote for the members is not available for this AGM. However, in pursuance of Section 112 and Section 113 of the Companies Act, 2013, representatives of the members such as the President of India or the Governor of a State or body corporate can attend the AGM through VC/OAVM and cast their votes through e-voting.

10. Pursuant to regulation 36 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 Companies can serve soft copies of full Annual Reports to those Members who have registered their e-mail address either with the Company or with the Depository Participant. Earlier, pursuant to SEBI circular SEBI/HO/CFD/CFD-PoD-2/P/CIR/2024/133 dated October 03rd 2024 it has been decided to provide relaxation upto September 30, 2025, from Regulation 36(1) (b) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") which requires sending hard copy of annual report containing salient features of all the documents prescribed in Section 136 of the Companies Act, 2013 to the shareholders who have not registered their email addresses.
11. In line with the Ministry of Corporate Affairs (MCA) Circular No. 17/2020 dated April 13, 2020, the Notice calling the AGM has been uploaded on the website of the Company at [www.novelixpharma.com](http://www.novelixpharma.com) The Notice can also be accessed from the websites of the Stock Exchanges i.e., BSE Limited at [www.bseindia.com](http://www.bseindia.com). The AGM Notice is also disseminated on the website of NSDL (agency for providing the Remote e-Voting facility and e-voting system during the AGM) i.e., [www.evotingindia.com](http://www.evotingindia.com).
12. The MCA in continuation to its previous General Circulars (including General Circular Nos. 21/2021 dated 14th December, 2021, 11/2022 dated December 28, 2022, 09/2023 dated September 25, 2023 and September 19, 2024 issued in respect to allowing Companies to hold AGM through video conferencing or other audio-visual means, has further decided to allow the companies to organize AGM through VC or OAVM in the year 2025 on or before 30th September, 2025 in accordance with the requirements laid down in Para 3 & 4 of General Circular No. 20/2020 dated. 05.05.2020.

### 13. THE INTRUCTIONS OF SHAREHOLDERS FOR REMOTE E-VOTING:

**Step 1** : Access through Depositories CDSL/NSDL e-Voting system in case of individual shareholders holding shares in demat mode.

**Step 2** : Access through CDSL e-Voting system in case of shareholders holding shares in physical mode and non-individual shareholders in demat mode.

- (i) The voting period begins on 27/09/2025 9:00 A.M. and ends on 29/09/2025 5:00 P.M. During this period shareholders' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date 23/09/2025 of 23/09/2025 may cast their vote electronically. The e-voting module shall be disabled by CDSL for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Pursuant to SEBI Circular No. **SEBI/HO/CFD/CMD/CIR/P/2020/242 dated 09.12.2020**, under Regulation 44 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, listed entities are required to provide remote e-voting facility to its shareholders, in respect of all shareholders' resolutions. However, it has been observed that the participation by the public non-institutional shareholders/retail shareholders is at a negligible level.

Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.

In order to increase the efficiency of the voting process, pursuant to a public consultation, it has been decided to enable e-voting to **all the demat account holders, by way of a single login credential, through their demat accounts/ websites of Depositories/ Depository Participants**. Demat account holders would be able to cast their vote without having to register again with the ESPs, thereby, not only facilitating seamless authentication but also enhancing ease and convenience of participating in e-voting process.

**Step 1** :Access through Depositories CDSL/NSDL e-Voting system in case of individual shareholders holding shares in demat mode.

(iv) In terms of SEBI circular no. SEBI/HO/CFD/CMD/CIR/P/2020/242 dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Pursuant to abovesaid SEBI Circular, Login method for e-Voting for **Individual shareholders holding securities in Demat mode CDSL/NSDL** is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in Demat mode with <b>CDSL Depository</b>	<ol style="list-style-type: none"> <li>1) Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The users to login to Easi / Easiest are requested to visit cdsi website <a href="http://www.cdslindia.com">www.cdslindia.com</a> and click on login icon &amp; My Easi New (Token) Tab.</li> <li>2) After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the evoting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers, so that the user can visit the e-Voting service providers' website directly.</li> <li>3) If the user is not registered for Easi/Easiest, option to register is available at cdsi website <a href="http://www.cdslindia.com">www.cdslindia.com</a> and click on login &amp; My Easi New (Token) Tab and then click on registration option.</li> <li>4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on <a href="http://www.cdslindia.com">www.cdslindia.com</a> home page. The system will authenticate the user by sending OTP on registered Mobile &amp; Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.</li> </ol>
Individual Shareholders holding securities in demat mode with <b>NSDL Depository</b>	<ol style="list-style-type: none"> <li>1) If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the following URL: <a href="https://eservices.nsd.com">https://eservices.nsd.com</a> either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period.</li> <li>2) If the user is not registered for IDeAS e-Services, option to register is available at <a href="https://eservices.nsd.com">https://eservices.nsd.com</a>. Select "Register Online for IDeAS "Portal or click at <a href="https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp">https://eservices.nsd.com/SecureWeb/IdeasDirectReg.jsp</a></li> <li>3) Visit the e-Voting website of NSDL. Open web browser by typing the following URL: <a href="https://www.evoting.nsd.com/">https://www.evoting.nsd.com/</a> either on a Personal Computer or on a mobile. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will</li> </ol>

	<p>be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period.</p> <p>4) For OTP based login you can click on <a href="https://eservices.nsdl.com/SecureWeb/evoting/evotinglogin.jsp">https://eservices.nsdl.com/SecureWeb/evoting/evotinglogin.jsp</a>. You will have to enter your 8-digit DP ID, 8-digit Client ID, PAN No., Verification code and generate OTP. Enter the OTP received on registered email id/mobile number and click on login. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on <b>company name or e-Voting service provider name</b> and you will be re-directed to <b>e-Voting service provider website</b> for casting your vote during the remote e-Voting period or joining virtual meeting &amp; voting during the meeting.</p>
Individual Shareholders (holding securities in demat mode) login through their <b>Depository Participants (DP)</b>	<p>You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period.</p>

Important note: Members who are unable to retrieve User ID/ Password are advised to use Forget User ID and Forget Password option available at abovementioned website.

Helpdesk for Individual Shareholders holding securities in demat mode for any technical issues related to login through Depository i.e. CDSL and NSDL

Login type	Helpdesk details
Individual Shareholders holding securities in Demat mode with <b>CDSL</b>	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at <a href="mailto:helpdesk.evoting@cdslindia.com">helpdesk.evoting@cdslindia.com</a> or contact at toll free no. 1800 21 09911
Individual Shareholders holding securities in Demat mode with <b>NSDL</b>	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at <a href="mailto:evoting@nsdl.co.in">evoting@nsdl.co.in</a> or call at : 022 - 4886 7000 and 022 - 2499 7000

**Step 2** : Access through CDSL e-Voting system in case of shareholders holding shares in physical mode and non-individual shareholders in demat mode.

- (v) Login method for Remote e-Voting for **Physical shareholders and shareholders other than individual holding in Demat form.**
- 1) The shareholders should log on to the e-voting website [www.evotingindia.com](http://www.evotingindia.com).
  - 2) Click on "Shareholders" module.
  - 3) Now enter your User ID
    - a. For CDSL: 16 digits beneficiary ID,
    - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
    - c. Shareholders holding shares in Physical Form should enter Folio Number registered with the Company.

- 4) Next enter the Image Verification as displayed and Click on Login.
- 5) If you are holding shares in demat form and had logged on to [www.evotingindia.com](http://www.evotingindia.com) and voted on an earlier e-voting of any company, then your existing password is to be used.
- 6) If you are a first-time user follow the steps given below:

<b>For Physical shareholders and other than individual shareholders holding shares in Demat.</b>	
PAN	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders) <ul style="list-style-type: none"> <li>• Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.</li> </ul>
Dividend Bank Details <b>OR</b> Date of Birth (DOB)	Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login. <ul style="list-style-type: none"> <li>• If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field.</li> </ul>

- (vi) After entering these details appropriately, click on "SUBMIT" tab.
- (vii) Shareholders holding shares in physical form will then directly reach the Company selection screen. However, shareholders holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password is to be also used by the demat holders for voting for resolutions of any other company on which they are eligible to vote, provided that company opts for e-voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.
- (viii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (ix) Click on the EVSN for the relevant <Company Name> on which you choose to vote.
- (x) On the voting page, you will see "RESOLUTION DESCRIPTION" and against the same the option "YES/NO" for voting. Select the option YES or NO as desired. The option YES implies that you assent to the Resolution and option NO implies that you dissent to the Resolution.
- (xi) Click on the "RESOLUTIONS FILE LINK" if you wish to view the entire Resolution details.
- (xii) After selecting the resolution, you have decided to vote on, click on "SUBMIT". A confirmation box will be displayed. If you wish to confirm your vote, click on "OK", else to change your vote, click on "CANCEL" and accordingly modify your vote.
- (xiii) Once you "CONFIRM" your vote on the resolution, you will not be allowed to modify your vote.
- (xiv) You can also take a print of the votes cast by clicking on "Click here to print" option on the Voting page.
- (xv) If a demat account holder has forgotten the login password then Enter the User ID and the image verification code and click on Forgot Password & enter the details as prompted by the system.

- (xvi) There is also an optional provision to upload BR/POA if any uploaded, which will be made available to scrutinizer for verification.
- (xvii) **Additional Facility for Non – Individual Shareholders and Custodians –For Remote Voting only.**
- Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to [www.evotingindia.com](http://www.evotingindia.com) and register themselves in the “Corporates” module.
  - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com).
  - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
  - The list of accounts linked in the login will be mapped automatically & can be delink in case of any wrong mapping.
  - It is Mandatory that, a scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
  - Alternatively Non Individual shareholders are required mandatory to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; \_\_\_\_\_ (designated email address by company) , if they have voted from individual tab & not uploaded same in the CDSL e-voting system for the scrutinizer to verify the same.

**PROCESS FOR THOSE SHAREHOLDERS WHOSE EMAIL/MOBILE NO. ARE NOT REGISTERED WITH THE COMPANY/DEPOSITORIES.**

1. For Physical shareholders- please provide necessary details like Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAR (self attested scanned copy of Aadhar Card) by email to **Company/RTA email id.**
2. For Demat shareholders -, Please update your email id & mobile no. with your respective Depository Participant (DP)
3. For Individual Demat shareholders – Please update your email id & mobile no. with your respective Depository Participant (DP) which is mandatory while e-Voting & joining virtual meetings through Depository.

If you have any queries or issues regarding e-Voting from the CDSL e-Voting System, you can write an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or contact at toll free no. 1800 21 09911

All grievances connected with the facility for voting by electronic means may be addressed to Mr. Rakesh Dalvi, Sr. Manager, (CDSL, ) Central Depository Services (India) Limited, A Wing, 25th Floor, Marathon Futurex, Mafatlal Mill Compounds, N M Joshi Marg, Lower Parel (East), Mumbai - 400013 or send an email to [helpdesk.evoting@cdslindia.com](mailto:helpdesk.evoting@cdslindia.com) or call at toll free no. 1800 21 09911

14. The Company has sent individual letters to all the Members holding shares of the Company in physical form for furnishing their PAN, KYC details and Nomination pursuant to SEBI Circular No. SEBI/HO/MIRSD/MIRSD\_RTAMB/P/CIR/2021/655 dated November 3, 2021 in Form ISR-1. The Form ISR-1 is also available on the website of the Company at [www.supraindustrialresources.in](http://www.supraindustrialresources.in) The Attention of the Members holding shares of the Company in physical form is invited to go through and submit the said Form ISR–1.

15. Members are requested to intimate changes, if any, pertaining to their name, postal address, e-mail address, telephone/mobile numbers, PAN, registering of nomination, power of attorney registration, Bank Mandate details, etc., to their DPs in case the shares are held in electronic form and to the RTA in prescribed Form ISR-1 and other forms pursuant to SEBI Circular No. SEBI/HO/MIRSD/MIRSD\_RTAMB/P/CIR/2021/655 dated November 3, 2021. Further, Members may note that SEBI has mandated the submission of PAN by every participant in securities market.

16. Nomination facility: As per the provisions of Section 72 of the Act, the facility for making nomination is available to the Members in respect of the shares held by them. Members who have not yet registered their nomination are requested to register the same by submitting Form No. SH-13. If a member desires to opt-out or cancel the earlier nomination and record a fresh nomination, the Member may submit the same in Form ISR-3 or Form SH-14, as the case may be. The said forms can be downloaded from the Company's website at [www.supraindustrialresources.in](http://www.supraindustrialresources.in) in Members are requested to submit the said form to their DPs in case the shares are held in electronic form and to the RTA at [www.vccipl.com](http://www.vccipl.com) in case the shares are held in physical form, quoting their folio no(s).

17. Members may please note that SEBI vide its Circular No. SEBI/HO/MIRSD/MIRSD\_RTAMB/P/CIR/2022/8 dated January 25, 2022 has mandated the Listed Companies to issue securities in demat form only while processing service requests viz. Issue of duplicate securities certificate; claim from Unclaimed Suspense Account; Renewal/Exchange of securities certificate; Endorsement; Sub division/Splitting of securities certificate; Consolidation of securities certificates/folios; Transmission and Transposition. Accordingly, Shareholders are requested to make service requests by submitting a duly filled and signed Form ISR-4, the format of which is available on the Company's website at [www.supraindustrialresources.in](http://www.supraindustrialresources.in) It may be noted that any service request can be processed only after the folio is KYC compliant. SEBI vide its notification dated January 24, 2022 has mandated that all requests for transfer of securities including transmission and transposition requests shall be processed only in dematerialized form. In view of the same and to eliminate all risks associated with physical shares and avail various benefits of dematerialization, Members are advised to dematerialize the shares held by them in physical form. Members can contact the Company or RTA, for assistance in this regard.

18. In terms of the Listing Regulations, securities of listed companies can only be transferred in dematerialized form with effect from 1st April 2019. In view of the above, Members are advised to dematerialize shares held by them in physical form.

19. Electronic copy of all the documents referred to in the accompanying Notice of the 40th AGM and the Explanatory Statement shall be available for inspection at the website of the Company at [www.supraindustrialresources.in](http://www.supraindustrialresources.in).

20. Details as required in sub-regulation (3) of Regulation 36 of the Listing Regulations and Secretarial Standard on General Meeting (SS-2) of ICSI, in respect of the Directors seeking appointment/ re-appointment at the 40<sup>th</sup> AGM, forms integral part of the Notice of the 40<sup>th</sup> AGM. Requisite declarations have been received from the Directors for seeking appointment/ re- appointment.

21. Since the AGM will be held at registered office, the Route Map is annexed in this Notice.

**By Order of the Board  
For Supra Industrial Resources Limited**

**Date: 04/09/2025  
Place: New Delhi**

**(Pooja Ramji Shukla)  
(Additional Director)  
DIN: 10811012**

**DETAILS OF DIRECTORS SEEKING APPOINTMENT/RE-APPOINTMENT IN THE FORTY ANNUAL GENERAL MEETING**

**Pursuance to Regulation 36(3) of the SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015**

<b>Name</b>	BHAVIN SHASHIKANT KHONA	SAGAR SHASHIKANT KHONA	POOJA RAMJI SHUKLA	SUBRATA NATH	NADEEM NAEEMUDDIN SHAIKH	MANOJ RAMBILAS JAISVAL
<b>DIN</b>	10222583	10222584	10811012	11005851	11222637	11222638
<b>Date of birth</b>	04/12/1986	14/11/1983	01/11/1994	04/07/1976	06/08/1993	17/06/1993
<b>Date of first appointment on the Board</b>	14/11/2024	14/11/2024	07/11/2024	19/03/2025	01/08/2025	01/08/2025
<b>Expertise in Special Functional Areas</b>	Medical	Finance	Accounts	Accounts	Marketing	Sales
<b>*Directorship held in other Public Limited Companies</b>	Nil	Nil	Nil	Nil	Nil	Nil

<b>Qualification</b>	B Pharma	M.Com	M.Com	B. Com	Secondary education	Secondary education
<b>No. of Meetings of the Board attended during the financial year</b>	3 (Three)	3 (Three)	3 (Three)	Nil	Nil	Nil
<b>Shareholding in the Company</b>	Yes	Yes	Nil	Nil	Nil	Nil
<b>Disclosure of inter-se relationships between Directors and Key Managerial Personnel of the Company</b>	Brother	Brother	Employee	None	None	None
<b>Membership of Committees of other public limited companies</b>	None	None	None	None	None	None
<b>No. of Shares held in the Company</b>	16425	16425	Nil	Nil	Nil	Nil

## **EXPLANATORY STATEMENT PURSUANT TO THE PROVISIONS OF SECTION 102 OF THE COMPANIES ACT, 2013**

### **Item No. 4**

The Board has, based on the recommendation of the Nomination and Remuneration Committee and subject to the approval of the Members, approved the appointment of Mr. Bhavin Shashikant Khona (DIN: 10222583), Whole Time Director, for a period of 5 (Five) years from the conclusion of this AGM till the 46th AGM of the Company not liable to retire by rotation. Mr. Bhavin Shashikant Khona has given his consent to act as a Director of the Company, along with a declaration in Form DIR - 8 stating that he is not disqualified from being appointed as the Managing Director in terms of Section 164 of the Act. He satisfies all the conditions as set out in Section 196(3) of the Act and Part-I of Schedule V to the Act, for being eligible for his re-appointment.

The broad terms and conditions of the proposed appointment of and remuneration to Mr. Bhavin Shashikant Khona are mentioned below:

However, the Board of Directors shall have the liberty to revise, vary or amend the terms of his remuneration, including payment of salary, perquisites or other benefits, within the overall limits as may be prescribed under the Companies Act, 2013 and/or as approved by the Members of the Company, from time to time.

### **Item No. 5**

On recommendation of the Nomination and Remuneration Committee, Mr. Sagar Shashikant Khona (DIN:10222584) was appointed as an Additional Non-Executive Director on the Board of the Company w.e.f. 14th November, 2024.

Your directors have proposed the appointment of Mr. Sagar Shashikant Khona, as a Non-Executive Director of the Company, a resolution to that effect has been set out as Item No. 5. of this Notice. Mr. Sagar Shashikant Khona not disqualified from being appointed as a Director in terms of Section 164 of the Act and has given his consent to act as a Director.

Relevant details relating to appointment of Mr. Sagar Shashikant Khona as required by the Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and Secretarial Standard-2 on Annual General Meetings are provided as an Annexure to this Notice.

Your Board recommends the Ordinary Resolution set forth in Item No. 5 of the Notice for approval of the members.

None of the Directors or Key Managerial Personnel of the Company or their relatives are in any way concerned or interested, financially or otherwise, in the proposed resolution, except Mr. Sagar Shashikant Khona who is considered interested in the resolution for his appointment.

#### **Item No. 6**

On recommendation of the Nomination and Remuneration Committee, Mrs. Pooja Ramji Shukla (DIN: 10811012) was appointed as an Additional Non-Executive Director on the Board of the Company w.e.f. 7th November, 2024.

Your directors have proposed the appointment of Mrs. Pooja Ramji Shukla, as a Non-Executive Director of the Company, a resolution to that effect has been set out as Item No. 6 of this Notice. Mrs. Pooja Ramji Shukla not disqualified from being appointed as a Director in terms of Section 164 of the Act and has given her consent to act as a Director.

Relevant details relating to appointment of Mrs. Pooja Ramji Shukla as required by the Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and Secretarial Standard-2 on Annual General Meetings are provided as an Annexure to this Notice.

Your Board recommends the Ordinary Resolution set forth in Item No. 6 of the Notice for approval of the members.

None of the Directors or Key Managerial Personnel of the Company or their relatives are in any way concerned or interested, financially or otherwise, in the proposed resolution, except Mrs. Pooja Ramji Shukla who is considered interested in the resolution for her appointment.

#### **Item No. 7**

On recommendation of the Nomination and Remuneration Committee, Mr. Subrata Nath (DIN: 11005851) was appointed as an Additional Non-Executive Director on the Board of the Company w.e.f. 19<sup>th</sup> March, 2025.

Your directors have proposed the appointment of Mr. Subrata Nath, as a Non-Executive Director of the Company, a resolution to that effect has been set out as Item No. 7 of this Notice. Mr. Subrata Nath not disqualified from being appointed as a Director in terms of Section 164 of the Act and has given his consent to act as a Director.

Relevant details relating to appointment of Mr. Subrata Nath as required by the Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and Secretarial Standard-2 on Annual General Meetings are provided as an Annexure to this Notice.

Your Board recommends the Ordinary Resolution set forth in Item No. 7 of the Notice for approval of the members.

None of the Directors or Key Managerial Personnel of the Company or their relatives are in any way concerned or interested, financially or otherwise, in the proposed resolution, except Mr. Subrata Nath who is considered interested in the resolution for his appointment.

#### **Item No. 8**

On recommendation of the Nomination and Remuneration Committee, Mr. Nadeem Naeemuddin Shaikh (DIN:11222637) was appointed as an Additional Non-Executive Independent Director on the Board of the Company w.e.f. 1<sup>st</sup> August, 2025.

Your directors have proposed the appointment of Mr. Nadeem Naeemuddin Shaikh, as a Non-Executive Independent Director of the Company, for a period of 05 (Five) years and a resolution to that effect has

been set out as Item No. 3 of this Notice. Mr. Manoj Rambilas Jaisval not disqualified from being appointed as a Director in terms of Section 164 of the Act and has given his consent to act as a Director.

He has also submitted a declaration of independence under Section 149(6) of the Companies Act, 2013 and under Regulation 16 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. In the opinion of the Board, he fulfills the conditions specified in the Act and the rules made thereunder and also under the SEBI LODR Regulations for appointment as Independent Director and is independent of the Management.

Relevant details relating to appointment of Mr. Nadeem Naeemuddin Shaikh as required by the Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and Secretarial Standard-2 on Annual General Meetings are provided as an Annexure to this Notice.

Your Board recommends the Ordinary Resolution set forth in Item No. 8 of the Notice for approval of the members.

None of the Directors or Key Managerial Personnel of the Company or their relatives are in any way concerned or interested, financially or otherwise, in the proposed resolution, except Mr. Nadeem Naeemuddin Shaikh who is considered interested in the resolution for his appointment.

#### **Item No. 9**

On recommendation of the Nomination and Remuneration Committee, Mr. Manoj Rambilas Jaisval (DIN:11222638) was appointed as an Additional Non-Executive Independent Director on the Board of the Company w.e.f. 1<sup>st</sup> August, 2025.

Your directors have proposed the appointment of Mr. Manoj Rambilas Jaisval, as a Non-Executive Independent Director of the Company, for a period of 05 (Five) years and a resolution to that effect has been set out as Item No. 3 of this Notice. Mr. Manoj Rambilas Jaisval not disqualified from being appointed as a Director in terms of Section 164 of the Act and has given his consent to act as a Director.

He has also submitted a declaration of independence under Section 149(6) of the Companies Act, 2013 and under Regulation 16 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. In the opinion of the Board, he fulfills the conditions specified in the Act and the rules made thereunder and also under the SEBI LODR Regulations for appointment as Independent Director and is independent of the Management.

Relevant details relating to appointment of Mr. Manoj Rambilas Jaisval as required by the Companies Act 2013, SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015 and Secretarial Standard-2 on Annual General Meetings are provided as an Annexure to this Notice.

Your Board recommends the Ordinary Resolution set forth in Item No. 9 of the Notice for approval of the members.

None of the Directors or Key Managerial Personnel of the Company or their relatives are in any way concerned or interested, financially or otherwise, in the proposed resolution, except Mr. Manoj Rambilas Jaisval who is considered interested in the resolution for his appointment.

## **Item No. 10**

The Board of Directors at its meeting held on 3<sup>rd</sup> September, 2025 has recommended the appointment of M/s Bharat Khaniwal & Co., Practicing Company Secretaries (M. No. A29035, COP No. 27989) as the Secretarial Auditor of the Company to undertake Secretarial Audit of the Company, as required under Section 204 of the Companies Act, 2013 and rules made thereunder, for consecutive 5 years, i.e. from the Financial Year 2025-26 to Financial Year 2029-30.

M/s Bharat Khaniwal & Co. has provided written consent to act as the Secretarial Auditor of the Company.

Accordingly, consent of the members is sought for passing an Ordinary Resolution.

None of the Directors and Key Managerial Personnel of the Company and their relatives are, in any way, concerned or interested, financially or otherwise, in the resolution set out at Item No. 10 of the Notice.

### **DETAILS AS PER REGULATION 36 OF SEBI (LISTING OBLIGATION AND DISCLOSURE REQUIREMENT) 2015**

<b>PARTICULARS</b>	<b>DETAILS</b>
Proposed fees payable to the Secretarial Auditor along with terms of appointment	Rupees 1,20,000/- (One Lac Twenty Thousand) and taxes or out of pocket expenses wherever applicable.
Basis of recommendation for appointment including the details in relation to and credentials of the Secretarial Auditor proposed to be appointed	<p><b>M/s Bharat Khaniwal &amp; Co.</b>, a firm having Unique Code Number S2025RJ1026200 registered in the year 2025 with the Institute of Company Secretaries of India. The firm has practice areas in the field of corporate laws FEMA and SEBI regulations with a very highly professional approach. The firm is functioning as the sole proprietor under the proprietorship of <b>CS Bharat Khaniwal</b>. The firm deals with many reputed corporate sectors.</p> <p>The firm believes and is committed to providing proactive and consistent quality service to all the clients. The firm keeps abreast with the latest changes in the legislation and their implications on the business of its clients. Each assignment is handled with dedicated personal services.</p>

**By Order of the Board  
For Supra Industrial Resources Limited**

**Date:04/09/2025  
Place: New Delhi**

**Sd/-  
(Pooja Ramji Shukla)  
(Additional Director)  
DIN: 10811012**

Annexure II

**Form No. MGT-11**

Proxy form [Pursuant to section 105(6) of the Companies Act, 2013 and rule 19(3) of the Companies (Management and Administration) Rules, 2014]

CIN: **L65999DL1985PLC019987**

Name of the company: **Supra Industrial Resources Limited**

Registered office: **E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat, East Delhi, Delhi, India, 110092**

Name of the member (s):

Registered address:

E-mail Id:

Folio No/ Client Id:

DP ID:

I/We, being the member (s) of ..... shares of the above named company, hereby appoint

1. Name: .....

Address:

E-mail Id:

Signature:....., or failing him

2. Name: .....

Address:

E-mail Id:

Signature:.....,

As my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the Annual General Meeting of the company, to be held on the **Tuesday, the 30<sup>th</sup> day of September, 2025 at 3.30 P.M. (IST) at E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat, East Delhi, Delhi, India, 110092** and at any adjournment thereof in respect of such resolutions as are indicated below:

S. No.	Ordinary Business	For	Against
1.	To receive, consider and adopt the Audited Balance Sheet of the Company as at 31st March, 2025 and the Statements of Profit & Loss for the year ended on that date together with the reports of Board of Directors and Auditors thereon.		

2.	To appoint Mrs. Pooja Ramji Shukla, who retires by rotation as a Director of the Company.		
3.	To appoint of M/S Sweta Jain & Co., (127673W) as statutory auditor of the company.		
	<b>Special Business</b>		
4	To approve change in designation of Mr. Bhavin Shashikant Khona (DIN: 10222583) as a Whole Time Director of the company.		
5	To regularise the additional director Mr. Sagar Shashikant Khona (DIN: 10222584) as a Non-Executive & Non-Independent Director of the company.		
6	To regularise the additional director Mrs. Pooja Ramji Shukla (DIN: 10811012) as a Non-Executive & Non-Independent Director of the company.		
7	To regularise the additional director Mr. Subrata Nath (DIN: 11005851) as a Non-Executive Non-Independent Director of the company.		
8	To regularise the additional director of Mr. Nadeem Naeemuddin Shaikh (DIN: 11222637) as Non- Executive Independent Director of the company.		
9	To regularise the additional director of Mr. Manoj Rambilas Jaisval (DIN: 11222638) as Non- Executive Independent Director of the company.		
10	To appoint M/s. Bharat Khaniwal & Co., company secretaries (Unique Code Number - S2025RJ1026200) as secretarial auditors of the company.		

Signed this .....day of .....2025.

.....  
Signature of shareholders

.....  
Signatures of Proxy holders(s)

**Affix Re. 1.00  
Revenue Stamp  
Signatures**

**Annexure III**

**Attendance Slip**

**MEMBERS ATTENDING THE MEETING IN PERSON OR BY PROXY ARE REQUESTED TO COMPLETE THE ATTENDANCE SLIP AND HAND IT OVER AT THE ENTRANCE OF THE MEETING HALL.**

I hereby record my presence at the Annual General Meeting of the Company at **E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat East Delhi Delhi 110092, at 3.30 P.M. (IST).**

Full name of the Member (in block letters) .....

Signature .....

Folio No. : .....

DP ID No.\* .....

Client ID No\*.....

Number of shares held .....

Notes:

- 1. Only Member/Proxy can attend the meeting. No minor would be allowed at the meeting.**
- 2. Member/Proxy wish attend the meeting must bring this attendance slip to the meeting and handover at the entrance duly filled in and signed.**

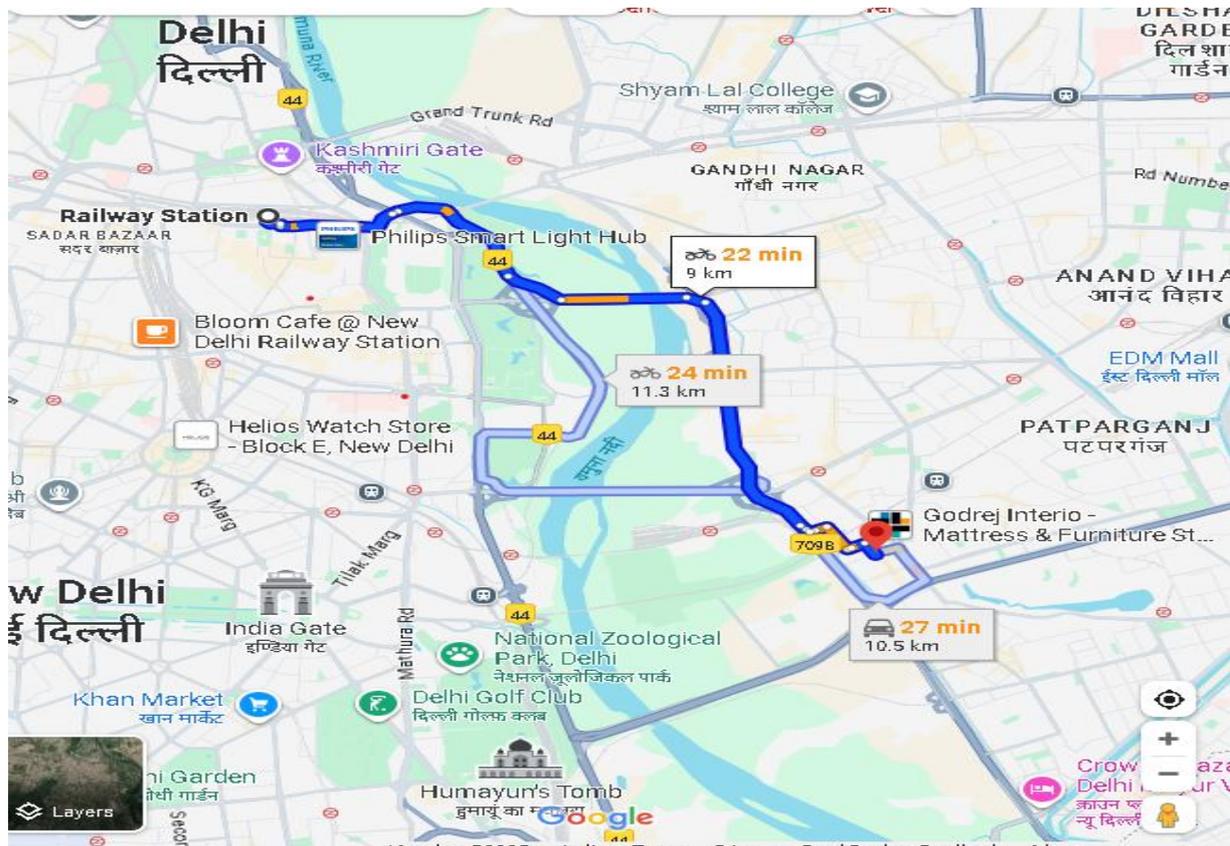
Full name of the proxy (in block letters) .....

**Signature .....**

**Note:**

- 1) This form should be signed across the stamp as per specimen signatures registered with the Company.
- 2) THIS FORM OF PROXY IN ORDER TO BE EFFECTIVE SHOULD BE DULY COMPLETED AND DEPOSITED AT THE REGISTERED OFFICE OF THE COMPANY, NOT LESS THAN 48 HOURS BEFORE THE COMMENCEMENT OF THE MEETING.
- 3) A proxy need not be a member of the Company.
- 4) A person can act as proxy on behalf of member not exceeding fifty and holding in the aggregate not more than 10% of the total share capital of the company carrying voting rights. A member holding more than 10% of the total share capital of the company voting right may appoint a single person as proxy and such person shall not act as a proxy for any other person or shareholder.
- 5) Please put a (✓) in the appropriate column against the resolution indicated in the Box. If you leave the 'for' or 'Against' column blank against any or all the resolution, your preference will not be counted. your proxy will be entitled to vote in the manner as he/she think appropriate.

**Here we are given below the route map for the purpose of company's AGM venue:**



## **SUPRA INDUSTRIAL RESOURCES LIMITED**

Registered Office: E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near  
By- Dhobi Ghat East Delhi, Delhi 110092

CIN: L65999DL1985PLC019987; Website: [www.supraindustrialresources.in](http://www.supraindustrialresources.in)  
E-mail: [supra1985@gmail.com](mailto:supra1985@gmail.com)  
Phone: +91- 9594924487

### **DIRECTORS' REPORT**

To the Members,

Your Directors have pleasure in submitting their **Fortieth Annual Report** of the Company together with the Audited Statements of Accounts for the year ended 31<sup>st</sup> March, 2025.

#### **1. FINANCIAL RESULTS**

The Company's financial performance for the year under review along with previous year figures is given here under:

*(Rupees in "000")*

<b>Particulars</b>	<b>For the year ended 31.03.2025</b>	<b>For the year ended 31.03.2024</b>
Revenue from Operation including other income	364	721
Expenses excluding Depreciation	243	536
Depreciation and Amortization	0.00	0.00
Profit (Loss) Before Tax	121	185
Extraordinary items	0.00	0.00
Current Tax	0.00	0.00
Deferred Tax Adjustment	0.00	0.00
Profit (loss) After Tax	121	185
Net fixed assets	0	0
Share capital	2500	2500
Reserve & Surplus Profit/(Loss)	(24)	(145)

## **2. REVIEW OF BUSINESS OPERATIONS AND FUTURE PROSPECTS:**

Your directors wish to submit that the Company was a Registered NBFC and due to Net Worth being less than the threshold limit of INR 2 Crore, the RBI has cancelled the License. However, albeit the grace period of three years expired on 1<sup>st</sup> August 2021, the Company's funds are still employed on loans pending return of Principal and Interest there on.

## **3. STATE OF COMPANY'S AFFAIRS:**

The Company is in the process of reduction of net owned fund in the NBFC activity as directed by the RBI. The Company is in Compliance with filing all necessary documents with Stock Exchange, SEBI, RBI, Web site of the Company and other necessary compliances with MCA.

## **4. CHANGE IN THE NATURE OF BUSINESS**

The Company was category- B registered NBFC bearing Registration No. B-14.00608 dated March 31, 1998. The Certificate of Registration (COR) of Supra Industrial Resources Limited has been cancelled by Reserve Bank of India vide their letter reference DNBS.ND.No. 375/CMS/05.19.357/2018-19 dated August 02, 2018.

There is no change in nature of business during the year under review (After Cancellation of NBFC registration no NBFC activity except the Continuation of existing loan to parties). The RBI has vide above mentioned letter dated August 02, 2018 instructed to reduce Financial Assets to less than 50 % in to NBFC activities in three years and the company is striving to gradually reduce Financial Assets to less than 50 % of the total funds of the company as per said order / letter. However, the effect and after-effect of "COVID-19" pandemic, the management has evaluated the current situation and after discussion with the borrowers, the management is confident of receiving back the advanced sum and also interest due on them.

## **5. ANNUAL RETURN:**

The Annual Return of the Company for the year ended March 31, 2025 prepared in compliance with Section 92 of the Companies Act, 2013 and related Rules in prescribed Form No. MGT-7 is placed on the website of the Company and can be accessed at the web link: <https://www.supraindustrialresources.in>

## **6. MEETINGS:**

During the financial year 2024-25, following meetings were convened:

### **Board Meetings**

<b>S. No.</b>	<b>Date of Board Meeting</b>	<b>Board's Strength</b>	<b>No. of Directors Present</b>
1	30/05/2024	3	3
2	25/06/2024	3	3
3	11/07/2024	3	3
4	30/07/2024	3	3

5	08/08/2024	3	3
6	03/09/2024	3	3
7	07/11/2024	3	3
8	14/11/2024	3	3
9	19/12/2024	6	6
10	14/02/2025	6	6
11	19/03/2025	6	6

### **Audit Committee Meetings**

<b>S. No.</b>	<b>Date of Board Meeting</b>	<b>Strength of Members</b>	<b>No. of Members Present</b>
1	30/05/2024	3	3
2	30/07/2024	3	3
3	14/11/2024	3	3
4	14/02/2025	3	3

### **Nomination & Remuneration Committee Meetings**

<b>S. No.</b>	<b>Date of Board Meeting</b>	<b>Strength of Members</b>	<b>No. of Members Present</b>
1	07/11/2024	3	3

### **Independent Director's Meeting**

<b>S. No.</b>	<b>Date of Board Meeting</b>	<b>Strength of Members</b>	<b>No. of Members Present</b>
1	19/03/2025	2	2

### **Stakeholder Relationship's Committee Meeting**

<b>S. No.</b>	<b>Date of Board Meeting</b>	<b>Strength of Members</b>	<b>No. of Members Present</b>
1	19/03/2025	3	3

## Members Meeting

S. No.	Type of Meeting	Date of Meeting	Total No. of Members Entitled to Attend	Number of Members Attended
1	Annual General Meeting	30/09/2024	258	5

## **7. DIRECTORS RESPONSIBILITY STATEMENT**

In accordance with the provisions of Section 134(5) of the Companies Act, 2013 the Board hereby submit its responsibility Statement:

- (a) In the preparation of the annual accounts, the applicable accounting standards had been followed along with proper explanation relating to material departures; if any.
- (b) the directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit of the company for that period;
- (c) The directors had taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;
- (d) The directors had prepared the annual accounts on a going concern basis; and
- (e) The directors, in the case of a listed company, had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively. – Internal financial control means the policies and procedures adopted by the Company for ensuring the orderly and efficient conduct of its business including adherence to Company's policies, the safeguarding of 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.
- (f) 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.

## **8. AUDITORS AND AUDITORS' REPORT:**

### **STATUTORY AUDITORS:**

At the Board Meeting of the company held on Thursday, 29th May, 2025, Board has appointed M/s Shweta Jain & Co. Chartered Accountants (Firm Registration No. 127673W) as Statutory Auditors of the Company under casual vacancy in place of Gaurav Hirawat & Associates, Chartered Accountants (Firm Registration No. (144897W) who tender his resignation on 8th November, 2024, to hold the office till the conclusion of Ensuing AGM.

Re-Appointment of M/s Shweta Jain & Co., Chartered Accountants (Firm Registration No. (127673W), as Statutory Auditors of the Company would be tabled at the meeting of Members, to be appointed as a Statutory Auditor of the Company Subject to the approval of Shareholders at General Meeting.

However, A Certificate from the Auditors has been received from the Statutory to the effect that their appointment, if made, would be within the limits prescribed under section 141(3)(g) of the Companies Act, 2013 and that they are not disqualified to be appointed as statutory auditors in terms of the

provisions of the proviso to section 139(1), section 141(2) and section 141(3) of the companies Act, 2013, and the provisions of Companies (Audit and Auditors) Rules, 2014.

The Notes on financial statement referred to in the Auditors' Report are self-explanatory and do not call for any further comments.

The Auditors of the company have not reported any instance of fraud committed against the company by its officers or employees under Section 143(12) of the Companies Act, 2013. The Auditors' Report for FY 2024-25 is unmodified i.e. it does not contain any qualification, reservation or adverse remark or disclaimer.

#### **SECRETARIAL AUDITOR:**

Pursuant to the provisions of Section 204(1) and other applicable provisions, if any, of the Companies Act, 2013 read with Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel), Rules 2014, M/s Bharat Khaniwal & Co., Practicing Company Secretaries as Secretarial Auditor to conduct Secretarial Audit of the Company in the upcoming 40<sup>th</sup> Annual General Meeting to be held on 30<sup>th</sup> September, 2025, for the period of Five consecutive years commencing from Financial Year 2025-26 and ending on Financial Year 2029-30 at a remuneration as may be decided by the Board from time to time.

The Secretarial Audit report for the financial year ended on March 31, 2025 received from M/s Bharat Khaniwal & Co. is annexed herewith and marked as "**Annexure I**" to this report.

- 1. The Company was non-compliant under regulation 6(1) of SEBI (LODR) Regulations, 2015, with requirement and Section 203 of the Companies Act, 2013 read with Rule 8A of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 to appoint a qualified company secretary as the compliance officer. Further the Company has appointed CS Radhika Mishra as whole time Company Secretary and compliance officer with effect from 20th June, 2025 and complied with the provision of Regulation 6(1).***

Our response to the above comment is that, as mentioned above the provisions of Regulation 6(1) of SEBI LODR and Section 203 of the Companies Act, 2013 read with Rule 8A of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 have been complied on 20<sup>th</sup> June, 2025.

- 2. During the review period, the Company has not complied with the provisions of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with respect to the constitution of the Board of Directors and its Committees.***

- The Company has not constituted the Audit Committee as required under Section 177 of the Companies Act, 2013 and Regulation 18 of SEBI (LODR) Regulations, 2015.*
- The Company has not constituted the Nomination and Remuneration Committee as required under Section 178 of the Companies Act, 2013 and Regulation 19 of SEBI (LODR) Regulations, 2015.*
- The Company has not constituted the Stakeholders Relationship Committee as required under Section 178(5) of the Companies Act, 2013 and Regulation 20 of SEBI (LODR) Regulations, 2015.*
- The Board of Directors is not duly constituted in terms of Section 149 of the Companies Act, 2013 and Regulation 17 of SEBI (LODR) Regulations, 2015, as it does not have the required number of Independent Directors.*

*Accordingly, the Company has been in non-compliance with the above provisions during the reporting period.*

Our response to the above comment is that, as mentioned above These are material non-compliances which may attract penal provisions under the Companies Act, 2013 and SEBI (LODR) Regulations, 2015.

3. **During the review period, It has been observed that the Company has prepared its financial statements for the financial year ended 2025 in accordance with the Accounting Standards notified under the Companies (Accounting Standards) Rules, 2006, and has not adopted the Indian Accounting Standards (Ind-AS) framework as prescribed under Section 133 of the Companies Act, 2013.**

Our response to the above comment is that, as mentioned above the management has informed that the same is under review and will be implemented in due course.

4. **During the review of the outcome of the Board Meeting held on 14/11/2024, it was noted that the outcome mentioned appointment of 4 Directors, whereas as per the Ministry of Corporate Affairs and Registrar of Companies records only 2 Directors were appointed.**

The Company is advised to exercise greater care in reporting the appointment of Directors in meeting outcomes so as to ensure consistency and compliance with the provisions of the Companies Act, 2013 and applicable Secretarial Standards.

#### **COST AUDITOR:**

The provisions of Section 148 of the Companies Act, 2013, read with the Companies (Cost Records and Audit) Rules, 2014 relating to Appointment of Cost Auditors is not applicable to Company.

#### **INTERNAL AUDITOR:**

M/s. Gaurav Hirawat & Associates, FRM No 0160587W, has been appointed as Internal Auditor pursuant to section 138 of the Companies Act, 2013.

#### **9. EXPLANATION OR COMMENTS BY THE BOARD ON EVERY QUALIFICATION, RESERVATION OR ADVERSE REMARK OR DISCLAIMER MADE:**

a) By the Auditor in his Report: **NIL**

(b) By the Company Secretary in Practice in his Secretarial Audit report: **as above given**

#### **10. COMPANY'S POLICY RELATING TO DIRECTORS APPOINTMENT, PAYMENT OF REMUNERATION AND DISCHARGE OF THEIR DUTIES**

The provisions of Section 178(1) relating to constitution of Nomination and Remuneration Committee are applicable to the Company and hence the Company has devised policy relating to appointment of Directors, payment of Managerial remuneration, Director's qualifications, positive attributes, independence of Directors and other related matters as provided under Section 178(3) of the Companies Act, 2013. Policy is available on the Company's web site.

#### **11. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS MADE UNDER SEC. 186 OF THE COMPANIES ACT, 2013**

Since the company was registered as NBFC, the provisions of loan, guarantees or investments under Section 186 of the Companies Act, 2013 were not applicable. Now, after the Certificate of Registration as NBFC has been cancelled by the RBI vide letter no. DBNS.375/CMS/05.19.357/2018-19 dated 2<sup>nd</sup> August 2018 and as per said letter, the company has been provided with three-year timeframe to reduce its financial assets. With the intermittent recurring of "COVID-19" pandemic during first quarter of reported financial year, the management has evaluated the current situation and after discussion with the borrowers, the management is confident of receiving back the advanced sum and also interest due on them. However, there may be some delay in receiving the deployed funds. The Company assures to take every step to safeguard Principal and Interest.

Moreover, the company will adhere to applicable provisions of Section 186 of Companies Act, 2013 as applicable to non NBFC companies.

## **12. PARTICULARS OF CONTRACTS OR ARRANGEMENTS MADE WITH RELATED PARTIES**

All transactions with Related Parties entered in Financial Year 2024 - 2025, were in ordinary course of business and at arm's length basis and in accordance with the provisions of the Act and the Rules made thereunder, the Listing Regulations and the Company's Policy on Related Party Transactions and that the provisions of Section 188 of the Companies Act, 2013 are not attracted. Thus, disclosure in Form AOC-2 is not required.

There are no related party transactions that may have potential conflict with the interest of the Company at large. The attention of the Members is drawn to the notes to the Financial Statement setting out the related party transactions disclosures, for Financial Year 2024 - 2025.

## **13. AMOUNT PROPOSED FOR RESERVES**

NIL

### **Transfer To Special Reserve U/S 45 I(C) & Contingent Provisions Against Standard Assets Under Reserve Bank of India Act, 1934.**

Under Section 45- I(C) Of the Reserve Bank of India Act, 1934, Non-Banking Financial Company is required to create reserve fund by transfer of 20% of the net profits to a special reserve. Since there are losses, the company has not transferred any amount to the special reserve for the current year. (Previous year- NIL). The Company will keep on transferring such fund to special fund as per RBI Act till the time company is being governed by RBI act post cancellation of certificate of registration as NBFC.

## **14. DIVIDEND**

No Dividend was declared for the current financial year due to loss incurred by the Company.

## **15. TRANSFER OF UNCLAIMED DIVIDEND TO INVESTOR EDUCATION AND PROTECTION FUND:**

Since there was no unpaid/unclaimed Dividend, the provisions of Section 125 of the Companies Act, 2013 do not apply.

## **16. DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS, COURTS AND TRIBUNALS:**

Since the company was registered as NBFC, the provisions of loan, guarantees or investments under Section 186 of the Companies Act, 2013 were not applicable. Now, after the Certificate of Registration as NBFC has been cancelled by the RBI vide letter no. DBNS.375/CMS/05.19.357/2018-19 dated 2<sup>nd</sup> August 2018 and as per said letter, the company has been provided with three-year timeframe to reduce its financial assets. The management has evaluated the current situation and after discussion with the borrowers, the management is confident of receiving back the advanced sum and also interest due on them. However, there may be some delay in receiving the deployed funds. The Company assures to take every step to safeguard Principal and Interest.

**17. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO**

The information pertaining to conservation of energy, technology absorption, foreign exchange Earnings and outgo as required under Section 134 (3)(m) of the Companies Act, 2013 read with Rule 8(3) of the Companies (Accounts) Rules, 2014 is furnished as under:

**a) Conservation of Energy:**

Steps taken for conservation	
Steps taken for utilizing alternate sources of energy	Necessary steps have already been taken wherever possible to conserve energy.
Capital investment on energy conservation equipment's	Not assessed.

**b) Technology Absorption:**

Efforts made for technology absorption	N.A.
Benefits derived	N.A.
Expenditure on Research & Development, if any	N.A.
Details of technology imported, if any	N.A.
Year of import	N.A.
Whether imported technology fully absorbed	N.A.
Areas where absorption of imported technology has not taken place, if any	N.A.

**c) Foreign Exchange Earnings/ Outgo:**

Earnings	NIL
Outgo	NIL

**d) Environment Protection:**

The Company and its management are Committed towards sustained economic and environment protection in and around Company and committed to adopt and implement policies accordingly.

**18. STATEMENT CONCERNING DEVELOPMENT AND IMPLEMENTATION OF RISK MANAGEMENT POLICY OF THE COMPANY.**

The Company does not have any Risk Management Policy as the element of risk threatening the Company's existence is very minimal.

**19. DETAILS OF POLICY DEVELOPED AND IMPLEMENTED BY THE COMPANY ON ITS CORPORATE SOCIAL RESPONSIBILITY INITIATIVES**

Pursuant to the provisions of Section 135 of the Companies Act, 2013, read with the Companies (Corporate Social Responsibility Policy) Rules, 2014, the requirement to constitute a Corporate Social Responsibility Committee and undertake CSR activities is not applicable to the Company for the financial year 2024–25, as the Company does not meet prescribed thresholds under the Act.

The Company has not developed and implemented any Corporate Social Responsibility initiatives as the said provisions are not applicable.

**20. POLICY ON NOMINATION, REMUNERATION AND BOARD DIVERSITY.**

The Board of Directors has framed a policy which lays down a framework in relation to the remuneration of Directors, Key Managerial Personnel and Senior Management of the Company. This policy also lays down criteria for selection and appointment of Board Members as well as diversity of the Board. Supra recognizes the benefits and importance of having a diverse Board of Directors in terms of skill set and experience. The Company has an optimum mix of executive and non-executive, independent directors and woman director.

The Nomination and Remuneration Policy has been uploaded on the website of the Company at <http://www.supraindustrialresources.in>.

**21. FAMILIARISATION PROGRAMME FOR THE BOARD MEMBER**

A note on the familiarisation programme adopted by the company for orientation and training of the directors and the Board evaluation process undertaken in compliance with the provisions of the Companies Act, 2013 and the listing regulations.

**22. DECLARATION BY INDEPENDENT DIRECTORS**

The Company's Independent Directors have submitted requisite declarations confirming that they continue to meet the criteria of independence as prescribed under Section 149(6) of the Act and Regulation 16(1)(b) of the Listing Regulations. The Independent Directors have also confirmed that they have complied with Schedule IV of the Act and the Company's Code of Conduct. The Company keeps a policy of transparency and arm's length while dealing with its Independent Directors. No transaction was entered with Independent Directors during the year which could have any material pecuniary relationship with them. Apart from sitting fee, no other remuneration was paid to any of the Independent Directors.

In the opinion of the Board, the Independent Directors hold highest standard of integrity and possess the requisite qualifications, experience, expertise and proficiency.

### **23. PERFORMANCE EVALUATION:**

The Company has devised a Policy for performance evaluation of the Board, Committees and other individual Directors (including Independent Directors) which include criteria for performance evaluation of Non-executive Directors and Executive Directors. The evaluation process inter alia considers attendance of Directors at Board and committee meetings, acquaintance with business, communicating inter se board members, effective participation, domain knowledge, compliance with code of conduct, vision and strategy.

Your Company has established well defined familiarization and induction program. Further, at the time of the appointment of an Independent Director, the Company issues a Letter of appointment outlining his / her role, function, duties and responsibilities.

The Board carried out an annual performance evaluation of the Board, Committees, Individual Directors and the Chairman. The Chairman of the respective Committees shared the report on evaluation with the respective Committee members. The performance of each Committee was evaluated by the Board, based on report on evaluation received from respective Committees.

The report on performance evaluation of the Individual Directors was reviewed by the Chairman of the Board and feedback was given to Directors. Pursuant to the provisions of the Companies Act, 2013 read with the Rules issued there under and the Listing Regulations (including any statutory modification(s) or re-enactment(s) for the time being in force), the process for evaluation of the annual performance of the Directors / Board / Committees was carried out.

In a separate meeting of Independent Director's, performance of non-independent directors, performance of the board as a whole and performance of the chairman was evaluated, taking into account the view of executive directors and non-executive directors. The same was discussed in the board meeting that followed the meeting of the independent directors at which the performance of the Board, its committees and individual directors was also discussed. Performance evaluation of independent directors was done by the entire board excluding the independent directors being evaluated.

### **24. DIRECTORS AND KEY MANAGERIAL PERSONNEL:**

In accordance with provisions of Section 152 of the Companies Act, 2013 and the Company's Articles of Association, Mrs. Pooja Ramji Shukla (DIN: 10811012), Director (Executive and Non-Independent) retires by rotation at the ensuing 40<sup>th</sup> Annual General Meeting and being eligible offers herself for re-appointment. The Board recommends the appointment of Mrs. Pooja Ramji Shukla (DIN: 10811012) for the consideration of the members of the Company.

Mr. Bhavin Shashikant Khona (DIN: 10222583) was appointed as a Additional Director (Executive & Non-Independent) of the Company w.e.f. 14/11/2024 and further appointed as a Whole-time Director of the Company for a term of five years w.e.f. 01/10/2025 to 30/09/2030 in Forthcoming 40th Annual General Meeting to be held on 30th September, 2025.

Mr. Sagar Shashikant Khona (DIN: 10222584) was appointed as a Additional Director (Executive & Non-Independent) of the Company w.e.f. 14/11/2024 and confirm as Director in Forthcoming 40th Annual General Meeting to be held on 30th September, 2025.

Mr. Subrata Nath (DIN: 11005851) was appointed as a Additional Director of the Company w.e.f. 19/03/2025 and confirm as Director in Forthcoming 40th Annual General Meeting to be held on 30th September, 2025.

Mr. Nadeem Naeemuddin Shaikh (DIN: 11222637) was appointed as Non-Executive, Independent Director, not liable to retire by rotation, for the first term to hold office for the period of five consecutive years with effect from conclusion of the 40th Annual General Meeting to be held on 30th September, 2025 up to the conclusion of the Annual General Meeting to be held for the financial year 31st March, 2030.

Mr. Manoj Rambilas Jaisval (DIN: 11222638) was appointed as Non-Executive, Independent Director, not liable to retire by rotation, for the first term to hold office for the period of five consecutive years with effect from conclusion of the 40th Annual General Meeting to be held on 30th September, 2025 up to the conclusion of the Annual General Meeting to be held for the financial year 31st March, 2030.

Mr. Vivek Kumar, (DIN: 08233771) was appointed as Non-Executive, Non-Independent Director w.e.f. 27/09/2019 and ceased same on 26.06.2024.

Mrs. Kinjal Bhavin Khona, (DIN: 10810796) was appointed as Non- Executive, Non-Independent Director w.e.f. 14/11/2024 and ceased same on 04/09/2025.

Mrs. Nidhi Sagar Khona, (DIN: 10222585) was appointed as Non- Executive, Non-Independent Director w.e.f. 14/11/2024 and ceased same on 04/09/2025.

Mrs. Tanu Jaiswal (DIN: 09380639) was appointed as Non-Executive, Independent Director w.e.f. 30/09/2022 and ceased same on 14/11/2024.

Mr. Rajat Agarwal, (DIN: 00266205) was appointed as Non-Executive, Non-Independent Director w.e.f. 13/08/2015 and ceased same on 19/12/2024.

#### **Key Managerial Personnel :**

Pursuant to the provisions of Section 203 of the Act Ms. Vanishta Sharma appointed as Company Secretary cum Compliance Officer of the Company w.e.f. 08.08.2024 and cessation as Company Secretary cum Compliance Officer w.e.f. 07/11/2024.

#### **25. SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES**

The Company does not have Any Subsidiary, Joint Venture or Associate Company.

#### **26. DEPOSITS**

The Company has neither accepted nor renewed any deposits. During the year under review. Balance Out standing if any - NIL

### **27. INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY**

Control system commensurate with the size, scale and complexity of its operations to maintain its objectivity and independence, internal audit function reports are reviewed by the board.

### **28. DISCLOSURE OF COMPOSITION OF AUDIT COMMITTEE AND PROVIDING VIGIL MECHANISM:**

The Audit Committee consists of the following members:

<b>S. No.</b>	<b>Name</b>	<b>Chairman/Member</b>
1.	Lokesh Devendra Kothari	Chairman
2.	Pooja Ramji Shukla	Member
3.	Sagar Shashikant Khona	Member

The above composition of the Audit Committee consists of independent Directors viz. Lokesh Devendra Kothari, Pooja Ramji Shukla and Sagar Shashikant Khona who forms the majority.

The Company has established a vigil mechanism and oversees through the audit committee, the genuine concerns expressed by the employees and other Directors. The Company has also provided adequate safeguards against victimization of employees and Directors who express their concerns. The Company has also provided direct access to the chairman of the Audit Committee on reporting issues concerning the interests of co employees and the Company. The Company also has proper whistle blower mechanism in place. The Vigil Mechanism Policy has been uploaded on the website of the Company at <http://www.supraindustrialresources.in>.

### **29. INTERNAL FINANCIAL CONTROL**

Company has an internal control system commensurate to the size of the Company and its operations. This system continuously monitors compliance to internal processes across the operations to ensure that all safeguarded and protected against loss from unauthorized use or disposition, that transactions are authorized, recorded and reported correctly and that operations are conducted in an efficient and cost-effective manner.

### **30. DISCLOSURES UNDER SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013.**

Your Company has adopted a Sexual Harassment Policy with an objective to ensure a protective and equal platform for working of women in the organization. From time-to-time information is provided to the women employees to feel empowered and work in free environment.

The Anti-Sexual Harassment Policy has been uploaded on the website of the Company at <http://www.supraindustrialresources.in>.

Your Company has also constituted an Internal Complaint Committee as per the provision of the aforesaid Act. The composition of the Internal Complaint Committee is as under:

S. No.	Name	Designation
1.	Pooja Ramji Shukla	Chairperson
2.	Rajat Agarwal	Member
3.	Lokesh Devendra Kothari	Member

As per the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, the disclosures required to be made are as under:

S. No.	Particulars	Details
1.	Number of complaints of sexual harassment received during the year	NIL
2.	Number of complaints disposed off during the year	NIL
3.	Number of cases pending for more than ninety days	NIL
4.	Number of workshops or awareness programme against sexual harassment carried out	NIL
5.	Nature of action taken by the employer or District Officer	N/A

### **31. PARTICULARS OF EMPLOYEES AND RELATED DISCLOSURES.**

The Disclosure required under Section 197(12) of the Act read with the Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and the Companies (Appointment and Remuneration of Managerial Personnel) Amendment Rules, 2016, During the year Nil Employees in the Company.

The Company does not have any employee whose particulars are required to be disclosed in terms of the provisions of Section 197(12) of the act read with Rule 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules 2014, hence furnishing of the same does not arise.

### **32. DEMATERIALISATION:**

Your Directors would request all the members who have not yet converted their holdings into dematerialized form, to do so thereby facilitating trading of their shares. As per SEBI guidelines it is mandatory that the shares of a company are in dematerialized form for trading.

### **33. ARCHIVAL POLICY:**

Pursuant to the Listing Regulations and in line with Supra Industrial Resources Limited's Policy on Determination of Materiality of Events, the Company shall disclose all such events to the Stock Exchanges and such disclosures shall be hosted on the website of the Company for a period of 5 years and thereafter the same shall be archived so as to be available for retrieval for a further period of three years by storing the same on suitable media. Thereafter the said information, documents, records may be destroyed as per the Company's policy on preservation of documents.

The Archival Policy has been uploaded on the website of the Company at <http://www.supraindustrialresources.in>.

### **34. DISCLOSURE OF ACCOUNTING TREATMENT:**

The Company follows Accounting Standards prescribed by the Companies Accounting Standard Rules, 2006 (as amended) and relevant provisions of the Companies Act, 2013. In preparation of financial statements, the Company has not adopted a treatment different from what is prescribed in the Accounting Standards. The financial statements for the year have been prepared in accordance with and in compliance of Schedule III of the Companies Act, 2013.

### **35. CORPORATE GOVERNANCE:**

Pursuant to Chapter IV of the SEBI Listing Regulations, the provision with regard to Corporate Governance is not applicable to the Company as the paid up equity capital does not exceed 10 crores and net worth does not exceed 25 crores as on the last day of the previous financial year. Further your Company aims and constantly strives in maintaining the highest standards of Corporate Governance practices.

### **36. MANAGEMENT DISCUSSION ANALYSIS REPORT:**

Pursuant to Regulation 34(2) read with the Schedule V of the SEBI Listing Regulations, it is required to annex Management Discussion and Analysis Report of the Company to the Annual Report. In compliance of the above-mentioned provisions, said report for the financial year ended March 31, 2025 is annexed herewith and marked as Annexure to this report in "**Annexure II**".

### **37. SHARES:**

The Authorized Share Capital of the Company Rs. 25,00,000 (Rupees Twenty-Five Lakh Only) divided into 2,50,000 (Two Lakh Fifty Thousand) Equity Shares of face value of Rs. 10/- (Rupees Ten Only) each.

The Paid-up capital of the Company of the Company Rs. 25,00,000 (Rupees Twenty-Five Lakh Only) divided into 2,50,000 (Two Lakh Fifty Thousand) Equity Shares of face value of Rs. 10/- (Rupees Ten Only) each.

#### **A. BUY BACK OF SECURITIES**

The Company has not bought back any of its securities during the year under review.

**B. SWEAT EQUITY**

The Company has not issued any Sweat Equity Shares during the year under review.

**C. BONUS SHARES**

No Bonus Shares were issued during the year under review.

**D. EMPLOYEES STOCK OPTION PLAN**

The Company has not provided any Stock Option Scheme to the employees.

**38. DETAILS OF APPLICATION MADE OR PROCEEDING PENDING UNDER INSOLVENCY AND BANKRUPTCY CODE, 2016**

During the period under review, there were no applications made or proceedings pending in the name of the company under the Insolvency and Bankruptcy code, 2016.

**39. DETAILS OF DIFFERENCE BETWEEN VALUATION AMOUNT ON ONE TIME SETTLEMENT AND VALUATION WHILE AVAILING LOAN FROM BANKS AND FINANCIAL INSTITUTIONS**

During the period under review, there has been no one time settlement of Loans taken from Banks and Financial Institutions.

**40. STATEMENT PURSUANT TO SECRETARIAL STANDARDS-1**

During the period under review, the Company has complied with the provisions of Secretarial Standards-1 and Secretarial Standards-2.

**41. MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY**

The company is going under takeover process, open offer under takeover code, 2011 has already been given. 100 % shareholding of promoter including promoter group will be transferred and there will be change in management too. The company is under approval stage of the same.

**42. MATERNITY BENEFIT**

Your Company has in place a policy in line with the requirements of the Maternity Benefit Act, 1961, as amended from time to time. The policy provides for enhanced benefits to women employees, including paid maternity leave, crèche facility, work from home options (wherever applicable) and other support in accordance with law. The Company is committed to ensuring a healthy, safe and inclusive work environment for all its employees.

During the year under review, the Company has complied with the provisions relating to maternity benefits and no complaints/representations were received under the said Act.

#### **43. GENDER DIVERSITY (MALE-FEMALE RATIO)**

Your Company recognizes the importance of diversity and inclusion at the workplace and is committed to providing equal opportunities to all employees, irrespective of gender. As on March 31, 2025, the Company had a total of **nil** employee.

The Company continues to focus on improving gender balance at all levels of the organization through its recruitment, training and employee development initiatives.

#### **44. ACKNOWLEDGEMENTS:**

Your directors place on records their sincere thanks to bankers, business associates, consultants, and various Government Authorities for their continued support extended to your Companies activities during the year under review. Your directors also acknowledge gratefully the shareholders for their support and confidence reposed on your Company.

**For and on behalf of the Board of Directors  
For Supra Industrial Resources Limited**

**Sd/-  
Bhavin Shashikant Khona  
Additional Director  
DIN: 10222583**

**Sd/-  
Pooja Ramji Shukla  
Additional Director  
DIN: 10811012**

**Date: 04/09/2025  
Place: New Delhi**

## **MANAGEMENT DISCUSSION AND ANALYSIS REPORT**

### **1. INDUSTRY STRUCTURE AND DEVELOPMENTS.**

After Cancellation of NBFC Category B Certificate by RBI, management intends to withdraw funds and put to use in to the activities other than Non-Banking Financial activities and accordingly object clause of the Company will be suitably modified and Promoters are looking for alternative source of revenue enhancement and deployment of funds returned from the existing borrowers.

### **2. OPPORTUNITIES & 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.
- COVID 19” Threat and its effect in the long term and bring recessionary conditions

### **3. SEGMENT-WISE OR PRODUCT-WISE PERFORMANCE:**

Segment-wise or Product –wise performance is not applicable to company as the company has only one business segment of Financing (Other) for the year under review.

### **4. OUTLOOK:**

The long-term fundamentals of the Indian economy continue to be strong due to rising incomes and large investments. These growth drivers are expected to sustain over a long period of time. At the same time, there are some concerns due to uncertain global economic environment and slow recovery in developed markets.

#### **FUTURE OUTLOOK:**

The management has evaluated the current situation and after discussion with the borrowers, the management is confident of receiving back the advanced sum and also interest due on them. However, there may be some delay in receiving the deployed funds. The management is constantly evaluating the ground realities caused by this pandemic and will update the shareholders of any development.

The Company is looking forward to diversify in to the areas as decided by the management once funds are returned by the Borrowers.

### **5. 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.

#### **6 . INTERNAL CONTROL SYSTEMS AND THEIR ADEQUACY:**

The Company's well defined organization structure, documented policy guidelines, predefined authority levels, and an extensive system of internal controls ensure optimal utilization and protection of resources, IT security, accurate reporting of financial transactions and compliance with applicable laws and regulations. The Internal Control systems are guided to ensure that assets are safeguarded against loss from unauthorized use or disposition, and that transactions are authorized, recorded, and reported correctly. The Company has an exhaustive budgetary control system. Actual performance is reviewed with reference to the budget by the management on an ongoing basis. The Company's internal auditors review business processes and controls. The Audit Committee of the Board then discusses significant findings and corrective measures initiated.

#### **7. DISCUSSION ON FINANCIAL PERFORMANCE WITH RESPECT TO OPERATIONAL PERFRMANCE:**

The Company achieved a turnover of Rs. 3,64,375/- during the year, as compared to Rs. 7,21,202/- in the previous year. The Company's income from operations primarily comprises interest earned on loans advanced.

#### **8. MATERIAL DEVELOPMENT IN HUMAN RESOURCES / INDUSTRIAL RELATION FRONT, INCLUDING NUMBER OF PEOPLE EMPLOYED:**

The employees are satisfied and having good relationship with the Management.

#### **9. HUMAN RESOURCE:**

The Company keeps developing its organizational structure consistently over time. Efforts are made to follow excellent Human Resource practices. Adequate efforts of the staff and management personnel are directed on imparting continuous training to improve the management practices. The objective of your Company is to create a workplace where every person can achieve his or her full potential. The employees are encouraged to put in their best. Lot of hard work is put in to ensure that new and innovative ideas are given due consideration to achieve the short- and long-term objectives of your company.

#### **10. DETAILS OF ANY CHANGE IN RETURN ON NET WORTH AS COMPARED TO THE IMMEDIATELY PREVIOUS FINANCIAL YEAR ALONG WITH A DEATEILED EXPLANTAION THEREOF**

The Company had a net worth of Rs. 24,75,967/- for the financial year ended 31st March 2025, as compared to Rs. 23,54,744/- for the financial year ended 31st March 2024. The increase in net worth is attributable to the profits earned by the Company during the year."

#### **11. DECLARATION REGARDING COMPLIANCE BY BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL WITH THE COMPANY'S CODE OF CONDUCT:**

This is to confirm that the Company has adopted a Code of conduct for its employees including the director. Board of Directors of the Company confirm that the Company has in respect of the financial Year ended 31<sup>st</sup> March, 2024, received from the Senior Management team of the Company and the members of the Board, a declaration of Compliance with the code of Conduct as applicable to them.

**CERTIFICATE PURSUANT TO REGULATION 17(8) OF THE SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015**

To,  
The Members,  
Supra Industrial Resources Limited  
CIN: L65999DL1985PLC019987  
Reg. office: E-91-A First Floor, Old-No-91.  
Ganesh Nagar Pandav Nagar Complex, Near By-  
Dhobi Ghat East Delhi, Delhi 110092, India

We, Bhavin Shashikant Khona, and Pooja Ramji Shukla Additional Directors of the company certify to the Board that in respect to the Financial Year ended on March 31, 2025:

1. We have reviewed the financial statements and the Cash Flow Statement for the year ended March 31, 2025 and that to the best of our knowledge and belief:

(i) These statements do not contain any material untrue statements or omit any material fact or contain statements that might be misleading;

(ii) These statements together present a true and fair view of the Company's affairs and are in compliance with existing Accounting Standards, applicable laws and regulations.

2. There are, to the best of our knowledge and belief, no transactions entered into by the Company during the year which are fraudulent, illegal or violative of the Company's Code of Conduct.

3. We accept responsibility for establishing and maintaining internal controls for financial reporting and have evaluated the effectiveness of internal control system of the Company pertaining to financial reporting and we have disclosed to the auditors and the Audit Committee, deficiencies in the design or operation of such internal controls, if any, of which we are aware and the steps we have taken or propose to take to rectify these deficiencies.

4. We have indicated to the Auditors and the Audit Committee that:

(i) there has not been any significant change in internal control over financial reporting during the year under reference;

(ii) there has not been any significant change in accounting policies during the year requiring disclosure in the notes to the financial statements; and

(iii) There has not been any instance during the year of significant fraud of which we had become aware and the involvement therein, if any, of the management or an employee having a significant role in the Company's internal control system over financial reporting.

**For Supra Industrial Resources Limited**

Sd/-  
(Pooja Ramji Shukla)  
DIN: 10811012  
(Additional Director)  
Date : 04/09/2025  
Place: New Delhi

## **DECLARATION TO COMPLIANCE OF CODE OF CONDUCT**

This is to certify that the company has laid down its code of conduct for Board of Directors and Senior Management Personnel of the company and copy of the same has been uploaded on the website of the Company **[www.supraindustrialresources.in](http://www.supraindustrialresources.in)**

I hereby declare that all the Directors and Senior Managerial personnel have affirmed the compliance with the Code of Conduct and have given a confirmation thereto in this regard, in respect of financial year ended 31st March 2025.

For the purposes of this declaration, Senior Management Personnel means the Personnel who are members of the core management team, including persons in the cadre of functional heads and above but excluding Board of Directors as on March 31, 2025.

**For Supra Industrial Resources Limited**

**Sd/-  
(Pooja Ramji Shukla)  
DIN: 10811012  
(Additional Director)**

**Date : 04/09/2025  
Place: New Delhi**

## FORM AOC\_2

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

**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:**

Details of contracts or arrangements or transactions not at Arm's length basis.

SL. No.	Particulars	Details
a)	Name (s) of the related party & nature of relationship	NIL
b)	Nature of contracts/arrangements/transaction	NIL
c)	Duration of the contracts/arrangements/transaction	NIL
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	NIL
e)	Justification for entering into such contracts or arrangements or transactions'	NIL
f)	Date of approval by the Board	NIL
g)	Amount paid as advances, if any	NIL
h)	Date on which the special resolution was passed in General meeting as required under first proviso to section 188	NIL

2. Details of contracts or arrangements or transactions at Arm's length basis.

SL. No.	Particulars	Details
1.		
a)	Name (s) of the related party & nature of relationship	NIL
b)	Nature of contracts/arrangements/transaction	NIL
c)	Duration of the contracts/arrangements/transaction	NIL
d)	Salient terms of the contracts or arrangements or transaction including the value, if any	NIL
e)	Date of approval by the Board	NIL
f)	Amount paid as advances, if any	NIL

**For and on behalf of the Board of Directors  
Supra Industrial Resources Limited**

**Sd/-  
Bhavin Shashikant Khona  
Additional Director  
DIN: 10222583**

**Sd/-  
Pooja Ramji Shukla  
Additional Director  
DIN: 10811012**

**Dated: 04/09/2025  
Place: New Delhi**

## **CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS**

**(Pursuant to Regulation 34(3) and Schedule V Para C clause (10) (i) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)**

To,  
The Members,  
**Supra Industrial Resources Limited**  
**CIN: L65999DL1985PLC019987**  
**Reg. office: E-91-A First Floor, Old-No-91.**  
**Ganesh Nagar Pandav Nagar Complex, Near By-**  
**Dhobi Ghat East Delhi, Delhi 110092, India**

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of Supra Industrial Resources Limited having CIN L65999DL1985PLC019987 and having registered office at office: E-91-A First Floor, Old-No-91. Ganesh Nagar Pandav Nagar Complex, Near By- Dhobi Ghat East Delhi, Delhi 110092, (hereinafter referred to as 'the Company'), produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal [www.mca.gov.in](http://www.mca.gov.in)) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ending on 31st March, 2025 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority.

<b>Sr. No</b>	<b>Name of Director</b>	<b>DIN</b>	<b>Date of appointment in Company</b>
1	LOKESH DEVENDRA KOTHARI	10671223	25/06/2024
2	POOJA RAMJI SHUKLA	10811012	07/11/2024
3	BHAVIN SHASHIKANT KHONA	10222583	14/11/2024
4	SAGAR SHASHIKANT KHONA	10222584	14/11/2024
5	KINJAL BHAVIN KHONA	10810796	14/11/2024
6	NIDHI SAGAR KHONA	10222585	14/11/2024
7	SUBRATA NATH	11005851	19/03/2025

Ensuring the eligibility of for the appointment / continuity of every Director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on our verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

**For M/s Bharat Khaniwal & Co.**  
**Company Secretaries**

**Place: Jaipur**  
**Date: 04/09/2025**

Sd/-  
**Bharat Khaniwal**  
**(Proprietor)**  
**Membership No.29035**  
**C.P. No-27989**  
**UDIN: A029035G001173629**

**Form No. MR-3**  
**SECRETARIAL AUDIT REPORT**  
**FOR THE FINANCIAL YEAR ENDED ON 31st MARCH, 2025**

*[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,**  
**Supra Industrial Resources Limited**  
**CIN: L65999DL1985PLC019987**  
**Reg. office: E-91-A First Floor, Old-No-91.**  
**Ganesh Nagar Pandav Nagar Complex,**  
**Near By-Dhobi Ghat East Delhi, Delhi 110092, India**

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practice by **Supra Industrial Resources Limited (L65999DL1985PLC019987)**. Secretarial audit was conducted in the manner that provided us a reasonable basis for evaluating the corporate conduct/ statutory compliance and expressing our opinion thereon.

Based on our verification of the Company's books, papers, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, We hereby report that in our opinion; the Company has, during the audit period covering the financial year ended on 31st March, 2025 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, minutes' books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2025 according to the provisions of:

- i The Companies Act, 2013 (the Act) and the rules made there under;
- ii The Securities Contract (Regulation) Act, 1956 and Rules made there under;
- iii The Depositories Act, 1996 and Regulations and Bye-laws framed there under;
- iv Foreign Exchange Management Act,1999and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;(Not Applicable to the Company during Audit Process);
- v The Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act,1992 ('SEBI Act') viz.;

a. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations,2015;

b. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations,2011;

c. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

d. The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;

e. The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999; [Not applicable as there was no reportable event during the financial year under review for secretarial audit]

f. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008; [Not applicable as there was no reportable event during the financial year under review for secretarial audit]

g. 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;

- h. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; [Not applicable as there was no reportable event during the financial year under review for secretarial audit] and
- i. The Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018; [Not applicable as there was no reportable event during the financial year under review for secretarial audit]

I. As identified by the management, following laws are specifically applicable to the Company:

- a. Reserve Bank of India Act, 1934;
- b. Prevention of Money-Laundering Act, 2002;
- c. Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013
- d. General Laws
- e. Any other applicable laws

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

- (i) Secretarial Standards issued by The Institute of Company Secretaries of India.
- (ii) The Listing Agreement entered into by the Company with BSE Limited read with SEBI (LODR) Regulations, 2015.

To the best of our understanding, we are of the view that during the period under review, the Company has complied with the provisions of the Acts, Rules, Regulations, Guidelines, Standards, etc. mentioned above subject to the following observations:

**1. The Company was non-compliant under regulation 6(1) of SEBI (LODR) Regulations, 2015, with requirement and Section 203 of the Companies Act, 2013 read with Rule 8A of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 to appoint a qualified company secretary as the compliance officer. Further the Company has appointed CS Radhika Mishra as whole time Company Secretary and compliance officer with effect from 20th June, 2025 and complied with the provision of Regulation 6(1).**

**2. The Company has not complied with the provisions of the Companies Act, 2013 and the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with respect to the constitution of the Board of Directors and its Committees.**

- **The Company has not constituted the Audit Committee as required under Section 177 of the Companies Act, 2013 and Regulation 18 of SEBI (LODR) Regulations, 2015.**
- **The Company has not constituted the Nomination and Remuneration Committee as required under Section 178 of the Companies Act, 2013 and Regulation 19 of SEBI (LODR) Regulations, 2015.**
- **The Company has not constituted the Stakeholders Relationship Committee as required under Section 178(5) of the Companies Act, 2013 and Regulation 20 of SEBI (LODR) Regulations, 2015.**
- **The Board of Directors is not duly constituted in terms of Section 149 of the Companies Act, 2013 and Regulation 17 of SEBI (LODR) Regulations, 2015, as it does not have the required number of Independent Directors.**

**Accordingly, the Company has been in non-compliance with the above provisions during the reporting period.**

**3. The Company has not complied with the provisions of the Indian Accounting Standards (Ind-AS) as prescribed under Section 133 of the Companies Act, 2013 read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015, as amended, in preparation and presentation of its financial statements for the financial year ended 2025. The financial statements have been**

*prepared in accordance with the previous Accounting Standards notified under the Companies (Accounting Standards) Rules, 2006. Consequently, the financial statements are not in conformity with the requirements of Ind-AS framework, which is a non-compliance under the Companies Act, 2013.”.*

- 4. During the review of the outcome of the Board Meeting held on 14/11/2024, it was noted that the outcome mentioned appointment of 4 Directors, whereas as per the Ministry of Corporate Affairs and Registrar of Companies records only 2 Directors were appointed.**

**We further report that**

- a. The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors.
- b. Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.
- c. None of the directors in any meeting dissented on any resolution and hence there was no instance of recording any dissenting member's view in the minutes

**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. Company has introduced compliance alert system for applicability of all applicable laws, rules, regulations and guidelines.

**We further report that** during the audit period, there was no other event/action having major bearing on affairs of the Company except the following:

During the year the Open Offer ("Offer") for Acquisition of upto 65,000 Equity Shares representing 26.00% of the Voting and/or Share from the Shareholders of Supra Industrial Resources Limited, by Mr. Sagar Shashikant Khona, Mrs. Kinjal Bhavin Khona, Mrs. Nidhi Sagar Khona and Mr. Bhavin Shashikant Khona.

**Place: Jaipur  
Date: 04/09/2025**

**For M/s Bharat Khaniwal & Co.  
Company Secretaries**

**Sd/-  
Bharat Khaniwal  
(Proprietor)  
Membership No.29035  
C.P. No-27989  
UDIN: A029035G001173497**

This report is to be read with our letter of even date which is annexed as **Annexure-A** forms an integral part of this report.

**Annexure-A**

**To,  
The Members,  
Supra Industrial Resources Limited  
CIN: L65999DL1985PLC019987  
Reg. office: E-91-A First Floor, Old-No-91.  
Ganesh Nagar Pandav Nagar Complex,  
Near By-Dhobi Ghat East Delhi, Delhi 110092, India**

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

1. Maintenance of secretarial record 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 processes 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 processes 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 f 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 procedures on test basis.
6. The Secretarial Audit report is neither an assurance to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.
7. The maximum liability of our firm under the secretarial audit in respect of the aggregate of all claims shall not exceed the fee charged by me.

**For M/s Bharat Khaniwal & Co.  
Company Secretaries**

**Place: Jaipur  
Date: 04/09/2025**

**Sd/-  
Bharat Khaniwal  
(Proprietor)  
Membership No.29035  
C.P. No-27989  
UDIN: A029035G001173497**

## INDEPENDENT AUDITOR'S REPORT

To,  
The members of  
Supra Industrial Resources Limited,  
New Delhi

### Report on the Audit of the Standalone Financial Statements

#### Opinion

We have audited the accompanying financial statements of **Supra Industrial Resources Limited**, (“the Company”), which comprise the Balance Sheet as at March 31, 2025, the Statement of Profit and Loss 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.

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, (“Ind AS”) and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2024, the profit and total comprehensive income, changes in equity and its cash flows for the year ended on that date.

#### **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 standalone financial statements under the provisions of the Act and the Rules made thereunder, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI’s Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the standalone financial statements.

#### **Key Audit Matters**

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

There are no any Reportable Key Audit Matters.

#### **Information Other than the Standalone Financial Statements and Auditor’s Report Thereon**

The Company’s Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board’s

Report including Annexures to Board's Report, Business Responsibility Report, Corporate Governance and Shareholder's Information, but does not include the standalone financial statements and our auditor's report thereon.

Our opinion on the standalone financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the standalone 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 no any material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

### **Management's Responsibility for the Standalone Financial Statements**

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.

In preparing the standalone financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

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

### **Auditor's Responsibilities for the Audit of the Standalone Financial Statements**

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.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

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.

- 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.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the standalone financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- 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.

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 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 financial statements.

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.

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.

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.

## **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, 2024 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2024 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 matter to be included in the Auditor's Report under section 197(16), In our opinion and according to the information and explanations given to us, the remuneration paid by the Company to its directors during the current year is in accordance with the provisions of section 197 of the Act. The remuneration paid to any director is not in excess of the limit laid down under section 197 of the Act. The Ministry of Corporate Affairs has not prescribed other details under section 197(16) which are required to be commented upon by us.
- 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 has no pending litigations on its financial position in its standalone financial statements.
  - ii. The Company has made provision, as required under the applicable law or accounting standards, for material foreseeable losses, if any, on long-term contracts including derivative contracts.
  - iii. There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
  - iv. (a) The management has represented that, to the best of its knowledge and belief, other than as disclosed in the notes to the accounts, no funds have been advanced or loaned or invested (either from borrowed funds or share premium or any other sources or kind of funds) by the company to or in any other person(s) or entity(ies), including foreign entities ("Intermediaries"), with the understanding, whether recorded in writing or otherwise, that the Intermediary shall, whether, directly or indirectly lend or invest in other persons or entities identified in any manner whatsoever by or on behalf of the company ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries;
  
  - (b) The management has represented, that, to the best of its knowledge and belief, other than as disclosed in the notes to the accounts, no funds have been received by the company from any person(s) or entity(ies), including foreign entities ("Funding Parties"), with the understanding, whether recorded in writing or otherwise, that the company shall, whether, directly or indirectly, lend or invest in other persons or entities identified in any manner whatsoever by or on behalf

of the Funding Party ("Ultimate Beneficiaries") or provide any guarantee, security or the like on behalf of the Ultimate Beneficiaries; and

(c) Based on such audit procedures that have been considered reasonable and appropriate in the circumstances, nothing has come to our notice that has caused us to believe that the representations under sub-clause (i) and (ii) of Rule 11(e), as provided under (a) and (b) above, contain any material mis-statement.

- v. No dividend have been declared or paid during the year by the company.
- vi. Based on our examination which included test checks, the company has used an accounting software for maintaining its books of account which has a feature of recording audit trail (edit log) facility and the same has operated from 07.02.2024 as the company migrated to new software having audit trail feature from that date. Further, during the course of our audit we did not come across any instance of audit trail feature being tampered with.

2. As required by the Companies (Auditor's Report) Order, 2020 ("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.

3. As required by the Non-Banking Financial Companies Auditor's Report (Reserve Bank) Directions 2008, issued by Reserve Bank of India and on the basis of books and records of the company and the information provided to us during the course of audit, we place our observations on the matters specified in Paragraph 3 and 4 of the aforementioned directions.

A. (i) The Company is registered as a NBFC with Reserve Bank of India as required U/s 45-A of the Reserve Bank of India Act, 1934 and the Certificate of Registration granted on 31.03.1998 vide COR No.14.00608 under category-B as a Non-Deposit Taking Company.

(ii) ***The Company is not entitled to hold COR issued by Reserve Bank of India in terms of The Reserve Bank of India vide its order reference DNBS.ND.No.375/CMS/05.19.357/2018-19 dated 02.08.2018 has cancelled the Certificate of Registration (CoR) of the company on account of non maintaining net owned funds (NOF) of the company to Rs.200.00 lacs, , This fact has properly disclosed by the management under Notes of Account Note # 1: CORPORATE INFORMATION.***

B. As the Company is not accepting/holding public deposits, clause 'B' of paragraph 3 of the NBFC Auditor's Report (Reserve Bank) Directions 2008 is not applicable to the company.

C. (i) The Board of Directors has passed a resolution for the non-acceptance of any Public Deposits.

(ii) The Company has not accepted any Public Deposits during the relevant year.

(iii) The Company has complied with the prudential norms relating to income recognition, accounting standards, asset classification and provisioning for bad and doubtful debts as applicable to it in terms of Non-Banking Financial (Non- Deposit Accepting or Holding) Companies Prudential Norms (Reserve Bank Directions, 2007

D. The clause "company engaged in the business of non-banking financial institution not required to hold CoR subject to certain conditions" is not applicable.

**For M/s Shweta Jain & Co.  
Chartered Accountants**

**Partner: NAVEEN MEHTA  
M. No:078177**

**FRN No :127673W  
UDIN:25078177BMLAHU8669**

**Place: Mumbai  
Date:30/05/2025**

## **ANNEXURE “A” TO THE INDEPENDENT AUDITOR’S REPORT**

(Referred to in paragraph 1(f) under ‘Report on Other Legal and Regulatory Requirements’ section of our report to the Members of **Supra Industrial Resources Limited** of even date)

### **Report on the Internal Financial Controls Over Financial Reporting under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 (“the Act”)**

We have audited the internal financial controls over financial reporting of **SUPRA INDUSTRIAL RESOURCES LIMITED**, (“the Company”) as of March 31, 2024 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 Board of Directors of the Company 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. 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 respective company’s policies, the safeguarding of 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 internal financial controls over financial reporting of the Company 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”) issued by the Institute of Chartered Accountants of India and the Standards on Auditing prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. 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 auditor’s judgment, 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 for our audit opinion on the internal financial controls system over financial reporting of the Company.

#### **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 an authorized of management and directors of the company; and
- (3) provide reasonable assurance regarding prevention or timely detection of an authorized 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, to the best of our information and according to the explanations given to us, 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 March 31, 2022, 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 M/s Shweta Jain & Co.  
Chartered Accountants**

**Partner: NAVEEN MEHTA  
M. No:078177**

**FRN No :127673W  
UDIN:25078177BMLAHU8669**

**Place: Mumbai  
Date:30/05/2025**

## ANNEXURE 'B' TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 2 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of **Supra Industrial Resources Limited**, of even date)

i. In respect of the Company's Property, Plant and Equipment:

- (a) The Company has maintained proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipments.
  - (b) The Company has a program of verification to cover all the items of fixed assets in a phased manner which, in our opinion, is reasonable having regard to the size of the Company and the nature of its assets. Pursuant to the program, certain fixed assets were physically verified by the management during the year. According to the information and explanations given to us, no material discrepancies were noticed on such verification.
  - (c) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the title deeds of immovable properties (other than immovable properties where the Company is the lessee and the leases agreements are duly executed in favour of the lessee) disclosed in the standalone financial statements are held in the name of the Company.
  - (d) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the Company has not revalued its Property, Plant and Equipment (including Right of Use assets) or intangible assets or both during the year.
  - (e) According to information and explanations given to us and on the basis of our examination of the records of the Company, there are no proceedings initiated or pending against the Company for holding any benami property under the Prohibition of Benami Property Transactions Act, 1988 and rules made thereunder.
- ii. The Company is in the business of Non-Banking Finance and have only Shares in demat Form, but due to market value of share became negligible, the management decided to w/off the same.
- iii. According to the information and explanations given to us, the Company has taken unsecured loans from one bodies corporate, covered in the register maintained under section 189 of the Companies Act, 2013,

in respect of which:

- (a) The terms and conditions of the grant of such loans are, in our opinion, prima facie, not prejudicial to the Company's interest.
- (b) The schedule of repayment of principal and payment of interest has been stipulated and repayments or receipts of principal amounts and interest have been regular as per stipulations. **The above loan is in the nature of loans repayable on demand and no specifying any terms or period of repayment.**
- (c) There is no overdue amount remaining outstanding as at the year-end.

- iv. In our opinion and according to the information and explanations given to us, the Company has complied with the provisions of Sections 185 and 186 of the Act in respect of grant of loans, making investments and providing guarantees and securities, as applicable.
- v. According to the information and explanations given to us, the Company has not accepted any deposit during the year and accordingly the compliance with Section 73 to 76 of the Act is not applicable. In respect of unclaimed deposits, the Company has complied with the provisions of Sections 73 to 76 or any other relevant provisions of the Act. According to the information and explanations given to us, no order has been passed by the Company Law Board or the National Company Law Tribunal or the Reserve Bank of India or any Court or any other tribunal on the Company.
- vi. The maintenance of cost records has not been specified by the Central Government under section 148(1) of the Companies Act, 2013 for the business activities carried out by the Company. Thus reporting under clause 3(vi) of the order is not applicable to the Company.
- vii. According to the information and explanations given to us, in respect of statutory dues:
- (a) The Company is regular in depositing undisputed statutory dues including Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and any other statutory dues, as applicable, with the appropriate authorities. Further, no undisputed amounts payable in respect thereof were outstanding at the year-end for a period of more than six months from the date they became payable.
  - (b) There are no dues in respect of Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and any other statutory dues that have not been deposited with the appropriate authorities on account of any dispute.
- viii. According to the information and explanation given to us, company has no transactions, not recorded in the books of account have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961);
- ix. (a) In our opinion, the company has not defaulted in repayment of loans or other borrowings or in the payment of interest thereon to any lender during the year;
- (b) Company is not declared wilful defaulter by any bank or financial institution or other lender;
- (c) According to the information and explanation given to us, term loans were applied for the purpose for which the loans were obtained;
- (d) According to the information and explanation given to us, funds raised on short term basis have not been utilised for long term purposes;
- (e) According to the information and explanation given to us, the company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures;
- (f) According to the information and explanation given to us, the company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies;

- (x) (a) The Company has not raised moneys by way of initial public offer or further public offer (including debt instruments) during the year;
- (b) According to the information and explanation given to us, the Company has not made any preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) during the year.
- (xi) (a) Based on examination of the books and records of the Company and according to the information and explanations given to us, considering the principles of materiality outlined in Standards on Auditing, we report that no fraud by the Company or on the Company has been noticed or reported during the course of the audit.
- (b) According to the information and explanations given to us, no report under sub-section (12) of Section 143 of the Companies Act, 2013 has been filed by the auditors in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government.
- (c) We have taken into consideration the whistle blower complaints received by the Company during the year while determining the nature, timing and extent of our audit procedures.
- (xii) According to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, clause 3(xii) of the Order is not applicable.
- (xiii) In our opinion and according to the information and explanations given to us, the transactions with related parties are in compliance with Section 177 and 188 of the Act, where applicable, and the details of the related party transactions have been disclosed in the financial statements as required by the applicable accounting standards.
- (xiv) (a) Based on information and explanations provided to us and our audit procedures, the company has appointed an internal auditor of its business;
- (b) Till the date of our audit report, we have not provided report of internal auditor to comment upon.**
- (xv) In our opinion and according to the information and explanations given to us, the Company has not entered into any non-cash transactions with its directors or persons connected to its directors and hence, provisions of Section 192 of the Act are not applicable to the Company.
- (b) The Company is not carried on any fresh Non-Banking Financial or Housing Finance activities (NBFC or HFC) during the our Audit Period.
- (c) The company is not a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India, accordingly the provisions of sub-clause (c) and (d) of clause 3(xvi) of the Order are not applicable;
- (xvii) The Company has incurred cash losses in the current year Rs. 1,81,377/- in compression to the immediately preceding financial year Rs. 7,06,436/-. Here it is relevant that we have considered only amount written off of Rs. 3,65,930/- amounts, for arriving cash loss.
- (xviii) There has been no resignation of the statutory auditors during the year. Accordingly, clause 3(xviii) of the Order is not applicable.
- (xix) According to the information and verbal explanations given to us and on the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying to the financial statements, our knowledge of the board of directors and management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to believe that any material uncertainty exists as on the date

of the audit report that the company is not capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date.

We, however, state that this is not an assurance as to the future viability of the Company. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the Company as and when they fall due. At the end of financial year liability towards outsiders got increased and recovery from borrowers is not certain or time bounded hence we are not able to comment upon material uncertainty towards discharge of liabilities which become due in future.

(xx) In our opinion and according to the information and explanations given to us, there is no unspent amount under sub-section (5) of Section 135 of the Act pursuant to any project. Accordingly, clauses 3(xx)(a) and 3(xx)(b) of the Order are not applicable.

(xxi) The reporting under clause (xxi) is not applicable in respect of audit of standalone financial statements of the Company. Accordingly, no comment has been included in respect of said clause under this report.

**For M/s Shweta Jain & Co.  
Chartered Accountants**

**Partner: NAVEEN MEHTA  
M. No:078177**

**FRN No :127673W  
UDIN:25078177BMLAHU8669**

**Place: Mumbai  
Date:30/05/2025**

Supra Industrial Resources Limited, New Delhi  
Balance Sheet as on 31st March 2025

Amount INR ,000

	Particulars	Note no	As At 31st March 2025	As at 31st March 2024
1	Equity and Liabilities			
(I)	Shareholders Fund			
	A Share Capital	3	2,500	2,500
	B Reverse and Surplus	4	-24	-145
			-	-
2	Non Current Liabilities		-	-
	A Long Term Borrowings	5	-	1,604
	B Deffered Tax Liability (Net)		-	-
	C Other Long Term Liabilites		-	-
	D Long Term Provisions	6	-	13
3	Current Liabilities		-	-
	A Short Term Borrowings		-	-
	B Trade Payables		-	-
	C Other Current Liabilities	7	-	330
	D Short Term Provisions		-	-
			-	-
	Total		2,476	4,302
II	Assets			
(I)	Non Current Assets			
	A Fixed Assets			
	i. Property , plant and equipment	8	2	2
	II Intangible Assets		-	-
	III Capital Work in Progress		-	-
	IV Intangible assets under development		-	-
	B Non Current Investment		-	-
	C Defferd Tax Assets (Net)		-	-
	D Long Term Loans and Advances	9	-	4,252
	E Other Non Current Assets	10	73	-
(II)	Current Assets			
	A Current Investment		-	-
	B Inventroies		-	-
	C Trade Receivables		-	-
	D Cash and Cash Equivalents	11	540	12
	E Short term loans and advances	12	1,860	35
	F Other Current Assets			
	Total		2,476	4,302

Notes to Accounts and significant accounting Policies 2

Note No 1- 15 form Integral Part of these Financial Statements

For Shweta Jain and Company  
Chartered Accountants

For Supra Industrial Resources Limited

Naveen Mehta  
Partner  
M. No. 078177  
FRN no. 127673W  
Date 30/05/2025  
UDIN:25078177BMLAHU8669

Sagar Shashikant Khona      Bhavin Shashikant Khona  
DIN:10222584                      DIN: 10222583  
Additional Director                  Additional Director

Supra Industrial Resources Limited, New Delhi

Profit and Loss Statement For the Year Ended 31st March 2025

				Amt inr 000	
	Particulars	Note No	Year Ended 31st March 2025	Year Ended 31st March 2024	
1	Revenue from operations	14	-	354	
2	Other Revenue	15	364	367	
3	Total Revenue		364	721	
4	Expenses		-	-	
	Cost of material/Services consumed		-	-	
	Purchase of stock in trade		-	-	
	Stock in trade	16	-	-	
	Employee Benefit Expenses	17	95	222	
	Finance Cost	18	30	118	
	Depreciation and Amortization expense	8	-	-	
	Other Administrative and Selling Expenses	19	118	197	
	Total Expenses		243	536	
5	Profit before Exceptional and Extraordinary Items and Tax (III - IV)		121	185	
6	Exceptional Items		-	-	
7	Profit before Extraordinary Items and Tax (V- VI)		121	185	
8	Extra Ordinary Items		-	-	
9	Profit before Tax		121	185	
10	Tax Expense:		-	-	
	(1) Current tax expense for current year		-	-	
	(2) Deferred Tax (Assets)/ Liability		-	-	
11	Profit/ (Loss) for the period from Continuing Operations		121	185	
12	Profit/(Loss) from Discontinuing Operations		-	-	
13	Tax Expense of Discontinuing Operations		-	-	
14	Profit/ (Loss) from Discontinuing Operations (after Tax)		-	-	
15	Profit/ (Loss) for the Period		121	185	
16	Earnings Per Equity Share		0.00	0.00	
	Basic				
	Notes to Accounts and significant accounting Policies	2			
	Note No 1 - 16 form Integral Part of these Financial Statements				

For Shweta Jain and Company  
Chartered Accountants

For Supra Industrial Resources Limited

Naveen Mehta

Partner

M. No. 078177

FRN no. 127673W

Date 30/05/2025

UDIN:25078177BMLAHU8669

Sagar Shashikant Khona

DIN:10222584

Additional Director

Bhavin Shashikant Khona

DIN: 10222583

Additional Director

Supra Industrial Resources Limited, New Delhi

Cash Flow Statement for the year ended 31st March, 2025			
	Particulars	Year ended 31.03.2025 Rs. 000	Year ended 31.03.2024 Rs. 000
<b>A.</b>	<b>CASH FLOW FROM OPERATING ACTIVITIES</b>		
	Profit Before Tax	0	185
	Adjustments for :		
		-	-
		-	-
	Depreciation	-	-
	(Loss)/Gain on sale of assets (Net)	-	-
	Liabilities /Provisions no longer required written	-	-
	Foreign Exchange (Gain)/Loss	-	-
	Interest Received on Fixed Deposit	-	-
		-	-
	Operating Profit before Working Capital Changes	0	184
	Adjustments for :		
	Trade Receivable	-	-
	Short Term Loans and Advances	2,354	-321
	Other Current Assets	-	-
	Long Term Loans and Advances	-1,617	122
	Other Non Current Assets	-	-
	TDS Receivable	-	-
	Trade Payables	-	-
	Other Current Liabilities	-	-
	Short Term Provisions	-330	-
	Long Term Provisions	-	-
		-	-
	Cash Generated from Operations	407	-15
	Income Tax payment	-	-
		-	-
	Net Cash generated from Operating Activities	407	-15
		-	-
<b>B.</b>	<b>CASH FLOWS FROM INVESTING ACTIVITIES</b>		
	Acquisition of Plant,Property and Equipments	-	-
	Deletion of Plant,Property and Equipments	-	-
	Interest received on Fixed Deposit	-	-
		-	-
	Net Cash used in Investing Activities	-	-
		-	-
<b>C.</b>	<b>CASH FLOWS FROM FINANCING ACTIVITIES</b>		
	Dividend Paid	-	-
	Tax on Dividend	-	-
		-	-
	Net Cash used in Financing Activities	-	-
		-	-
	Net Increase/(Decrease) in Cash and Cash Equivalent	407	-15
		-	-
	Cash and Cash Equivalents at 1st April	12	27
	Cash and Cash Equivalents as at 31st March	540	12

For Shweta Jain and Company  
Chartered Accountants

For Supra Industrial Resources Limited

Naveen Mehta  
Partner  
M. No. 078177  
FRN no. 127673W  
Date 30/05/2025  
UDIN:25078177BMLAHU8669

Sagar Shashikant Khona      Bhavin Shashikant Khona  
DIN:10222584                      DIN: 10222583  
Additional Director                  Additional Director

NOTE# 3				(Amounts in Rs 000.)
Particulars		Year Ended 31st March, 2025	Year Ended 31st March, 2024	
<b>SHARE CAPITAL</b>				
<b>(A) Authorized, Issued, Subscribed and Paid Up value Per Share</b>				
<b>Authorised Capital</b>				
2,50,000 Equity Shares of Rs 10/- each				
( Previous year 2,50,000 Equity Shares of Rs 10/- Each)				
<b>Total</b>		<b>2500</b>	<b>2,500</b>	
Issued, Subscribed and Paid up				
2,50,000 Equity Shares of Rs 10/- each				
( Previous year 2,50,000 EquityShares of Rs 10/- Each)				
<b>Total</b>		<b>2500</b>	<b>2,500</b>	
<b>(B) Shares in the company held by each shareholder holding more than 5% share</b>				
Name of the Shareholde		No of shares held in the company		% of the Holding
No Shareholder	NIL	-	-	-
<b>(C) Shares held by promoters at the end of the year</b>				<b>% Change during the _year 2025</b>
S. No.	Name of Promoter	No. of Share	% of Total Share	
1	Sagar Khona	16425	6.57%	100
2	Bhavin Khona	16425	6.57%	100
3	Nidhi Sagar Khona	16425	6.57%	100
4	Kijal Bhavin Khona	16425	6.57%	100
<b>NOTE#4</b>				
<b>Reserves and Surplus</b>				
<b>(a) Special Reserve U/s 451C of RBI Act, 1934</b>				
As per last Balance Sheet		139.68	139.68	
Add: Transfer during the year		-	-	
<b>Total (a)</b>		<b>139.68</b>	<b>139.68</b>	
<b>(b) Surplus i.e. Balance in the Statement of Profit &amp; Loss</b>				
As per last Balance Sheet		-284.93	-468.77	
Add: Current year Profit(loss)		0.12	184.79	
Less:Provision on Standard Assets@ 0.30% as per RBI		-	0.96	
<b>Total (b)</b>		<b>-284.81</b>	<b>-284.93</b>	
<b>Total (a) + (b)</b>		<b>-145.13</b>	<b>-145.26</b>	

<b>NOTE# 5</b>			-	-
Long-term borrowings			-	-
Maurya Industrial Resources Ltd			-	1,603.82
<b>Total</b>			-	<b>1,603.82</b>
			-	-
<b>NOTE# 6</b>			-	-
Long term Provisions			-	-
Provison for Gratuity			-	-
Provison for Leave Salary			-	-
Contingent Provisions against Standard Assets @ 0.30% as per RBI G			-	12.76
<b>Total</b>			-	<b>12.76</b>
<b>NOTE # 7</b>				
Other Current Liabilities				
Bonus payable			0	0
Sundry Creditors-			0	39.031
Internal Audit Fee Payable			0	0
Other Exp Payable			0	55.9
Rent Payable			0	0
Audit Fee payable			0	23.6
Salary Payable			0	200
TDS Payable			0	11.813
<b>Total</b>			<b>0</b>	<b>330.344</b>
<b>NOTE # 9</b>				
Long-Term Loans and Advances				
Beekay Engineering Corporation			0	4251.526
<b>Total</b>			<b>0</b>	<b>4251.526</b>
<b>NOTE #10</b>				
<b>OTHER NON CURRENT ASSETS:</b>				
Other Prepaid			73.455	0
<b>Total</b>			<b>73.455</b>	<b>0</b>

NOTE #11				
Cash and Cash Equivalents				
Balance with Banks -In current Account				
IDBI			18.047	12.163
Cash in Hand			522.248	0.2
Total			540.295	12.363
NOTE #12				
Short-Term Loans and Advances				
Unsecured- Considered Good - Others			1809.445	0
Advance Tax & TDS ( A.Y -2024-25)			50.397	35.397
Advance Tax & TDS ( A.Y -2023-24)			0	0
Total			1859.842	35.397
				(Amounts In Rs.000)
Particulars			Year Ended 31st March, 2025	Year Ended 31st March, 2024
NOTE# 13				
Revenue From Operations			0	353.966
Total			0	353.966
NOTE# 14				
Other Incomes				
Interest on Income Tax Refunds			0	1.306
Other Incomes			0.364375	365.93
Total			0.364375	367.236
NOTE# 15				
Change in inventories of finished goods, Work In Progress, Stock in Trade				
Opening Stock			0	0
Less: Closing Stock			0	0
Changes in inventories			0	0
NOTE# 16				
Employee Benefit Expenses				
Salaries and Wages			95.00	221.50
Bonus			-	-
Total			95.00	221.50

<b>NOTE# 17</b>			
Finance Costs			
Interest Paid		30.00	118.13
Total		30.00	118.13
<b>NOTE# 19</b>			
<b>Other Administrative and Selling Expenses</b>			
ROC Filing Expenses		1.00	3.50
Travelling Expenses		4.10	-
MSEI Exchange Listing Fee		16.23	64.88
Fees for MCX Wever Application		-	-
MSEI Penalty		-	11.80
Advertisement Expense		7.77	17.72
Conveyance Expenses		9.60	1.95
Insurance		-	-
Legal & Professional		63.55	64.75
Printing and Stationary Expenses		0.82	0.30
Postage		4.42	7.93
Rent		-	-
Audit Expense ( Payment to auditors)		5.90	23.60
Internal Audit Fee		-	-
Office expenses		4.77	0.35
Total		118.15	196.78

NOTE : 8. FIXED ASSETS											(Amount in Rs.)	
S.NO.	PARTICULARS	GROSS BLOCK				DEPRECIATION				NET BLOCK		
		As at 1.04.24	Addition	Deduction	As at 31.03.25	UPTO 1.4.2024	FOR THE PERIOD	Deduction	UPTO 31.3.2025	31.3.2025	31.3.2024	
1	Vehicles	47.51	-	-	47.51	45.13	-	-	45.13	2.38	2.38	
	TOTAL	47.51	-	-	47.51	45.13	-	-	45.13	2.38	2.38	
	PREVIOUS YEAR	47.51	-	-	47.51	45.13	-	-	45.13	2.38	2.38	

Financial ratios						2025		2024		
PARTICULARS		Numerator	Denominator	31st March, 2025	31st March, 2024	Variance IN %	Numerator	Denominator	Numerator	Denominator
(a)	Current ratio (in times)	Total current assets	Total current liabilities	0.14	0.14	0.17	47760	330344	60224	415853
(b)	Return on equity ratio (in %)	Profit for the year	Average total equity	8.17	8.17	211.27	184793	2262825.5	-165439	2254068.5
(c)	Trade receivables turnover ratio (in times)	Revenue from operations	Average trade receivables	0.00	0.00	NA, Due to No any Trade Receivables	353966	0	327443	0
(d)	Trade payables turnover ratio (in times)	Purchases of services and other expenses	Average trade payables	0.00	0.00	NA, Due to No any Trade Payables	0	0	0	0
(e)	Net capital turnover ratio (in times)	Revenue from operations	Total current assets less total current liabilities	-1.25	-1.25	-36.04	353966	-282584	327443	-355629
(f)	Net profit ratio (in %)	Profit for the year	Revenue from operations	52.21	52.21	203.33	184793	353966	-165439	327443
(g)	Return on capital employed (in %)	Profit before tax and Finance cost	Networth + deferred tax liabilities	12.86	12.86	446.75	302927	2354744	-80541	2170907
(h)	Debt equity ratio (in times)	Total debts	Total equity	0.68	0.68	-5.8	1603818	2354744	1397497	2170907
(i)	Debt service coverage ratio (in times)	Profit for the year+ non-cash operating expenses + finance cost	finance cost	2.56	2.56	370.3	302927	118134	-80541	84898
Reason for Variance more then 25%										
Current ratio (in times)		Due to in last Financial year a loan taken of Rs 150000/-in the month of March, so due to excess Balance in Bank Account in Previous year.								
Return on equity ratio (in %)		The Management start cost cutting at large level and Wite off Unnecessary Provisions.								
Net profit ratio (in %)		The Management start cost cutting at large level and Wite off Unnecessary Provisions.								
Return on capital employed (in %)		The Management start cost cutting at large level and Wite off Unnecessary Provisions.								
Debt equity ratio (in times)		Debt continue increase to meet day to day expenses								
Debt service coverage ratio (in times)		t Debt continue increase to meet day to day expenses								

SUPRA INDUSTRIAL RESOURCESA LIMITED

Annexure (Forming part of the Financial Statements)

FOR THE YEAR ENDED 31st March 2025

Schedule to the Balance Sheet

(As required in terms of Paragraph 9BB of Non-Banking Financial Companies Prudential Norms (Reserve Bank Directors, 1998)

(Rs '000)

Particulars			
Liabilities Side			
(1)	Loans and advances availed by the NBFCs inclusive of interest accrued thereon but not paid	Amount Outstanding	Amount Overdue
	(a) Debentures: Secured	} NIL	} NIL
	: Unsecured (Other than falling within the meaning of public deposit*)		
	(b) Deferred Credit		
	(c) Term Loans	0	
	(d) Inter-corporate Loans and Borrowings	} NIL	} NIL
	(e) Commercial Paper		
	(f) Public Deposits* (excluding interest accrued but not due Rs.78 Lakhs)	} NIL	
	(g) Other Loans (Specify nature) (Cash Credit and Working Capital Demand Loan including interest accrued thereon)	} NIL	
	* Please see Note 1 below		
(2)	Break-up of (1) (f) above (Outstanding public deposits inclusive of interest accrued thereon but not paid):		
	(a) in the form of Unsecured debentures	} NIL	} NIL
	(b) in the form of partly secured debentures i.e. Debentures where there is a shortfall in the value of security		
	(c) other public deposits		
	* Please see Note 1 below		
	Assets Side:		Amount outstanding
(3)	Break - up of Loans and Advances including bills receivables (other than those included in (4) below)		NIL
	(a) Secured		0
	(b) Unsecured		

Assets Side : (Contd.)		Amount outstanding
(4)	Break up of Leased Assets and stock on hire and hypothecation loans counting EUHP activities	NIL
	(1) Lease assets including lease rentals under sundry debtors	
	(a) Financial lease	
	(b) Operating lease	
	(ii) Stock on hire including hire charges under sundry debtors	
	(a) Assets on hire	
	(b) Repossessed Assets	
	(iii) Hypothecation loans counting towers EUHP activities	
	(a) Loans where assets have been repossessed	
	(b) Loans other than (a) above	
(5)	Break-up of Investments	
	Current Investments :	
	1. Quoted:	
	(i) Shares:	
	(a) Equity	
	(b) Preference	
	(ii) Debentures and Bonds	
	(iii) Units of mutual funds	
	(iv) Government Securities	
	(v) Others (Please specify)	
	2. Unquoted:	
	(i) Shares:	
	(a) Equity	
	(b) Preference	
	(ii) Debentures and Bonds	
	(iii) Units of mutual funds	
	(iv) Government Securities	
	(v) Others (Please specify)	

Annexure (Forming part of the Financial Statements) (Contd)

(Rs '000)

	Long Term Investments:			
1	Quoted			
	(i) Shares (a) Equity			
	(b) Preference			
	(ii) Debentures and Bonds			
	(iii) Units of mutual funds			
	(iv) Government Securities			
	(v) Other (Please specify)			
2	Unquoted:			
	(i) Shares (a) Equity			
	(b) Preference			
	(ii) Debentures and Bonds			
	(iii) Units of mutual funds			
	(iv) Government Securities			
	(v) Other (Please specify)			
(6)	Borrower group-wise classification of all leased assets, stock-on-hire and loans and advances Please see Note 2 below			
	Category	Amount net of Provisions		
		Secured	Unsecured	Total
	1. Related Parties**			
	(a) Subsidiaries			
	(b) Companies in the same group			
	(c) Other related Parties			
	2. Other than Related parties		0	4252
			0	4252
	Total			

## Annexure (Forming part of the Financial Statements) (Contd)

(Rs. '000')

(7)	Investor group-wise classification of all investments (current and long term in shares and securities (both quoted and unquoted) Please see Note 3 below				
	Category	Market value/Break up or fair value or NAV	Book Value (net of provision)		
	1. Related Parties ••				
	(a) Subsidiaries	}	}		
	b) Companies in the same group Market Value Rs.			NIL	NIL
	Book Value Rs.				
	(c) Other Related Parties				
	2. Other than Related Parties				
	Total				

•• As per Accounting Standard of ICAI (Please see Note 3)

(8)	Other information	
	Particulars	Amount
	(i) Gross Non-Performing Assets	}
	(a) Related parties	
	(b) Other than related parties	
	(ii) Net Non Performing Assets	
	(a) Related parties	
	(b) Other than related parties	
	(iii) Assets acquired in satisfaction of debt	NIL

## Notes:

1	As defined in paragraph 2 (1) (xii) of the Non Banking Financial Companies Acceptance of Public Deposits (Reserve Bank) Directions, 1998
2	Provisioning norms shall be applicable as prescribed in the Non Banking Financial Companies Prudential Norms (Reserve Bank) Directions, 1998
3	All accounting standards and guidance noted issued by ICAI are applicable including for valuation of investments and other assets as also assets acquired in satisfaction of debts However, market value in respect of quoted investments and break up/fair value/NAV in respect of unquoted investments should be disclosed irrespective of whether they are classified as long term or current in column (5) above.

Balance Sheet Abstract and Company's General Business profile			
			(Amounts Rs. In '000)
Registration Details		State Code	55
Registration No./CIN NO.:		L65999DL1985PLC019987	
Balance Sheet Date			31.3.2025
Capital Raised During the Year (Amount Rs.'000)			
Public issue	NIL	Right Issue	NIL
Bonus Issue		Private Placement	NIL
	NIL		
Position of Mobilisation and Deployment of Funds (Amount Rs. In '000)			
Total Liabilities		4302 Total Assets	4302
Sources of Funds			
Paid up capital		2500 Reserve & Surplus	-145
Secured Loans	Nil	Unsecured Loans	Nil
Long term Provisions		13 Deffered Tax	0
Application of Funds			
Net fixed Assets		2 Long term Loan & Adv	4252
Net Current Assets		490 Deffered Tax	0
Misc. Expenditure		0 Accumulated Loss	Nil
Performance of the Company			
Turnover		354 Total Expenditure	536
Profit Before Tax		185 Profit After Tax	185
Earning per Share (Rs.)		0.74 Dividend Rate(%)	Nil
Generic Names of Principal Products of the Company (as per monetary terms)			
Item code no. (ITC Code)			N.A.
Product Description			N.A.
As per our report of even date attached			

For Shweta Jain and Company  
Chartered Accountants

For Supra Industrial Resources Limited

Naveen Mehta  
Partner  
M. No. 078177  
FRN no. 127673W  
Date 30/05/2025  
UDIN:25078177BMLAHU8669

Sagar Shashikant Khona      Bhavin Shashikant Khona  
DIN:10222584                      DIN: 10222583  
Additional Director                Additional Director

# Supra Industrial Resources Limited

**CIN: L65999DL1985PLC019987**

## **SIGNIFICANT ACCOUNTING POLICIES TO AND FORMING PART OF THE STANDALONE FINANCIAL STATEMENTS FOR THE YEAR ENDED 31.03.2025**

### **A. SIGNIFICANT ACCOUNTING POLICIES**

#### **1. Basis of Preparation of Financial Statements**

These financial statements have been prepared to comply with the Generally Accepted Accounting Principles in India (Indian GAAP), including the Accounting Standards notified under the relevant provisions of the Companies Act, 2013.

The financial statements are prepared under the historical cost convention, except for certain fixed assets which are revalued, in accordance with the generally accepted accounting principles in India and the provisions of the Companies Act, 2013.

#### **2. Use of Estimates**

The preparation of financial statements in conformity with Indian GAAP requires judgments, estimates and assumptions to be made that affect the reported amount of assets and liabilities, disclosure of contingent liabilities on the date of the financial statements and the reported amount of revenues and expenses during the reporting period. Difference between the actual results and estimates are recognized in the period in which the results are known/ materialized.

#### **3. Fixed Assets**

##### **Tangible Assets**

Tangible Fixed Assets are stated at cost net of recoverable taxes and includes amounts less accumulated depreciation and impairment loss, if any. All costs, including financing costs till commencement of commercial production, net charges on foreign exchange contracts and adjustments arising from exchange rate variations attributable to the fixed assets are capitalized.

#### **4. Depreciation and Amortization**

Depreciation on tangible asset is provided on the Written down Value method based on the estimated useful lives of the assets as prescribed in Schedule II of the Companies Act, 2013. Depreciation on additions to fixed assets is charged on pro-rata basis in the year of purchase.

#### **5. Inventories**

Finished goods: It is valued at cost or market value whichever is lower.

#### **6. Transaction in foreign currencies**

The transactions in foreign currency are accounted at the equivalent rupee Value on the date of realization Sundry Debtors which are receivable in foreign currency, are stated at the Year end

#### **7. Employee Benefits**

The company has policy of accounting for leave encashment as and when paid for.

**8. Provisions, Contingent Liabilities and Contingent Assets**

Provisions involving substantial degree of estimation in measurement are recognized when there is present obligation as a result of past events and it is probable that there will be an outflow of resources. Contingent Liabilities are not recognized but are disclosed by way of Notes to Accounts. Contingent Assets are neither recognized nor disclosed in the Financial Statements.

**9. Material events occurring after the Balance Sheet Date are taken into cognizance.**

For Shweta Jain and Company  
Chartered Accountants

For Supra Industrial Resources Limited

Naveen Mehta  
Partner  
M. No. 078177  
FRN no. 127673W  
Date 30/05/2025  
UDIN:25078177BMLAHU8669

Sagar Shashikant Khona	Bhavin Shashikant Khona
DIN:10222584	DIN: 10222583
Additional Director	Additional Director