

**DIRECTOR'S REPORT**

Dear Stakeholders,

Your Directors present herewith the 31<sup>st</sup> Annual Report for the year ended 31.03.2016.

**FINANCIAL RESULTS***(In Rupees)*

<b>Particulars</b>	<b>For the Year Ended 31.03.2016</b>	<b>For the Year Ended 31.03.2015</b>
Income from Operations:		
Commission from real estate business	22,10,820	15,24,235
Sale of Bullion, Commodities, etc.,	17,84,371	12,22,538
Other Income	310	20,137
Total Income	39,95,501	27,66,910
Total Expenditure	39,15,221	17,23,003
Profit/(Loss) before tax	80,280	10,43,908
Provision for Tax	30,860	2,93,877
Net Profit/(Loss)	49,420	7,50,031

**FINANCIAL HIGHLIGHTS**

During the year under review your company carried-out the business of real estate & commission / agency and purchase & sale of commodities, bullion, etc. Company has earned the total revenue of Rs. 39,95,501/-. Net Profit after Tax for the year under consideration is Rs.49,420/-. Your Company hopes to increase its presence in the business in the coming years, which may increase the top line and also its profitability.

**TRANSFER TO RESERVES**

Company has not transferred any amount to General Reserve during financial year ended 31.03.2016.

**LIQUIDITY**

We continue to maintain sufficient funds to meet our strategic objective.

**DIVIDEND**

In view of the requirement of funds for the expansion, your Directors do not consider it desirable to recommend any dividend in the current year.

**CAPITAL**

During the year, the Company has not allotted any Equity Share on rights/ preferential/ private placement basis. All Equity Shares of the Company rank pari-passu in all respects.

The Company has also not allotted any Preference Shares/ Debentures.

Subsequent to 31<sup>st</sup> March, 2016 there has been no change in authorized, issued, subscribed and paid-up equity share capital of the company.

Authorised Share Capital of the Company as on 31.03.2016 is Rs. 4,00,00,000 divided into 40,00,000 Equity Shares of Rs. 10/- each and the Paid-up capital stands at Rs. 1,19,05,000/-.

**DIRECTORS AND KEY MANAGERIAL PERSON**

In accordance with the requirements of the Companies Act, 2013 and the Articles of Association, Mr. Sumit Gupta, Director of the Company, retires by rotation and being eligible, has expressed his willingness for re-appointment.

Board of Directors comprise of 5(five) Directors as on 31<sup>st</sup> March 2016, a good combination of Executive, Independent, Non-Independent & Woman Directors, namely Mr. Deepak Sharma, Ms. Lalita Mittal, Mr. Raj Kumar Gupta, Mr. Raman Mittal and Mr. Sumit Gupta.

- In accordance with the section 196, 197 read with Schedule V of Companies Act, 2013 Ms. Lalita Mittal was appointed as director on 19.07.2014 and subsequently on 08.08.2014 was nominated / designated as Whole Time Director & Chief Financial Officer.

## SWAGTAM TRADING & SERVICES LIMITED

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- Mr. Raj Kumar Gupta (DIN: 00074532) is Independent Director w.e.f. 30.04.2014.
- Mr. Deepak Sharma (DIN: 00293945) was appointed as Director w.e.f. 03.09.2008
- Mr. Raman Mittal (DIN: 06877244) is Independent Director w.e.f. 02.06.2014.
- Mr. Sumit Gupta (DIN: 06911742) was appointed as Additional Director of the Company on 29.01.2015 and subsequently on 12.09.2015 was nominated / designated as Director of the company.
- Mrs. Sonia Rani (ACS – 36984) was appointed as a Company Secretary cum Compliance Officer of the Company w.e.f. 25.05.2015.

### LOANS, GUARANTEES AND INVESTMENTS

Company has not given any kinds of Guarantee, provided any Security and made any Investments as specified under section 186 of Companies Act, 2013.

### MEETINGS OF THE BOARD

11(Eleven) Meetings of the Board were held during reporting period, the details of which are given in the Corporate Governance Report.

*(Maximum Gap of 120 days between two consecutive board Meetings has been complied with)*

### PUBLIC DEPOSITS

During the year under review, your company has not invited any fixed deposits from the Public and has not accepted fixed deposits and nothing is outstanding.

### STATUTORY AUDITORS

M/s GHOSH KHANNA & CO., Chartered Accountants, FRN – 003366N Statutory Auditors of the Company who were appointed as statutory auditors from 29<sup>th</sup> Annual General Meeting till 33<sup>th</sup> Annual General Meeting, subject to ratification at every Annual General Meeting by Members. The Certificate for their eligibility has been received.

### AUDITORS' REPORT

Auditors Report in respect of the Financial Statements of 31.03.2016 is self-explanatory and does not warrant any further comments / explanation from the Board of Directors.

### SECRETARIAL AUDITOR

The Board has appointed M/s B. Bhushan & Co., Practicing Company Secretary, to conduct Secretarial Audit for the Financial Year 2015-16. The Secretarial Audit Report for the financial year 2015-16 is annexed with Directors' Report. Secretarial Audit Report does not contain any qualification, reservation or adverse remarks.

### COST AUDITORS

The provisions of Section 148 of the Companies Act, 2013 does not apply to the Company and hence, no cost auditors are appointed.

### EXTRACT OF ANNUAL RETURN

Pursuant to section 92(3) of the Companies Act, 2013 ('the Act') and rule 12(1) of the Companies (Management and Administration) Rules, 2014, Extract of Annual Return of the Company in "Form MGT-9" is annexed herewith Director's Report.

### LISTING OF SHARES

Equity Shares of the Company are listed on BSE Ltd., Calcutta Stock Exchange Limited & Delhi Stock Exchange Limited (DSE stands de-recognized). Company has complied with the requirements of listing agreements during the period of review. Annual Listing Fee stands paid to BSE Ltd. for & upto-date (2016-17). Annual Custodial Fee stands paid to NSDL & CDSL for & upto 2016-17.

Company got the Trading Approval of 11,90,500 Equity Shares of the Company from BSE Ltd. w.e.f. 27.10.2015.

### SHIFTING OF REGISTERED OFFICE

The Registered Office of the Company stands shifted from "Girish Chandra Bardalai Path, Bamunimaidan, Guwahati, Assam, 781021" to "R – 489, GF–A, New Rajinder Nagar, New Delhi – 110060" during January 2016 vide Order No. RD(NER)/14/2014/446 bearing date 21.09.2015.

### PARTICULARS OF CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES

All the transaction(s) are in the ordinary course of business and at arms' length basis and details are part of Audited Annual Accounts.

### MANAGEMENT'S DISCUSSION AND ANALYSIS REPORT

In terms of the provisions of Regulation 34 of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, the Management's discussion and analysis is presented in a separate section forming part of the Annual Report.

### SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES

During the year under review, your Company does not have any subsidiary & holding companies and no type of joint-venture, merger or amalgamation.

### PARTICULARS OF EMPLOYEES

In terms of the provisions of the section 197(2) of the Companies Act, 2013 read with rule 5(2) & 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, none of the employee drew remuneration in excess of the limit set out in the said rules. During the year under review, the company does not have any employee who is covered under this Clause.

### CORPORATE GOVERNANCE

The Company is committed to maintain the highest standards of corporate governance and adhere to the corporate governance requirements set out by SEBI. Corporate Governance is about maximizing shareholders value ethically and sustainably. We believe sound corporate governance is essential criteria to enhance and retain investor's reliance. We always seek to ensure that our performance is driven by integrity. The report on Corporate Governance as stipulated under the Listing Agreement forms an integral part of this Annual Report. The requisite Certificate from the Secretarial Auditors of the Company confirming compliance with the conditions of corporate governance is attached to the Report on Corporate Governance.

### POLICY ON DIRECTORS' APPOINTMENT AND REMUNERATION

The Board consists of five members, one of whom is Executive(CFO) and whole-time director and two are independent directors and two are non-independent directors including one woman director. Board consists of appropriate mix of executive & independent & non-independent & woman directors to maintain the independence of the Board and separate its functions of governance and management.

The policy on Directors Nomination and Remuneration, including criteria for determining qualifications, positive attributes, independence of a director and other matters, as required under sub-section (3) of Section 178 of the Companies Act, 2013. There has been no change in the policy since last financial year.

### DECLARATION BY INDEPENDENT DIRECTORS

Mr. Raman Mittal and Mr. Raj Kumar Gupta are Independent Directors on the Board of your Company. The Company has received necessary declarations from each Independent Director under Section 149(7) of the Companies Act, 2013, and in the opinion of the Board and as confirmed by these Directors that both of them meets the criteria of independence laid down in Section 149(6) of the Companies Act, 2013 and Regulation 25 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

### BOARD EVALUATION

As mandated under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board shall review and monitor the Board evaluation framework. The Board evaluates various parameters such as decision-making, relationship with stakeholders, Company performance and strategy, checking Board and committee's effective working, etc.

The Companies Act, 2013 says that a formal annual evaluation needs to be made by the Board of its own performance and that of its committees and directors. Schedule IV of the Companies Act, 2013 states that the performance evaluation of independent director shall be done by the entire Board, excluding the director being evaluated.

The evaluation of all the directors and the Board as a whole has been conducted. The Board approved the evaluation results as collated by the nomination and remuneration committee.

### INDEPENDENT DIRECTORS

Independent Directors of the company have met 2 times in the financial year 2015-16 to (a) review the performance of non-independent directors and the Board as a whole, (b) review the performance of the Board of the company, taking into account the views of executive directors and non-executive directors; (c) assess the quality, quantity and timeliness of flow of information between the company management and the Board that is necessary for the Board to effectively and reasonably perform their duties.

## **SWAGTAM TRADING & SERVICES LIMITED**

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### **CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

Code of Conduct for the Prevention of Insider Trading is in accordance with the requirements specified in the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Board has adopted the same. The Insider Trading Policy of the Company explains the guidelines and procedures to be followed and disclosures to be made while dealing with shares of the Company, as well as the consequences of violation of norms. The Insider Trading Policy is available on the website of the Company.

### **UNIFORM LISTING AGREEMENT**

SEBI issued Listing Obligations and Disclosure Requirements Regulations, 2015 which become effective from December 1, 2015 by replacing existing Listing Agreement. The Company entered into New Listing Agreement with BSE Ltd. and Calcutta Stock Exchange Limited during February 2016.

### **OPERATIONS**

Our reputation for excellence and integrity earned through the consistent delivery of quality work and by adhering the highest standard of business conduct through principles of Corporate Governance continues to be our most valuable assets. As we position ourselves for the future and our standard of excellence, integrity and accountability will serve us well.

Further, no material events, commitment and changes occurred between the end of the financial year of the company to which the financial statements relate and the date of the report.

### **VIGIL MECHANISM**

The Vigil Mechanism Policy of the Company, which also incorporates a whistle blower policy in terms of the Listing Agreement, includes an Ethics & Compliance Task Force comprising senior executives of the Company. Protected disclosures can be made by a whistle blower through an e-mail, or telephone call or a letter to the Task Force or to the Chairman of the Audit Committee. The Policy on vigil mechanism is available on the Company's website.

### **CORPORATE SOCIAL RESPONSIBILITY**

Provisions of the Companies Act, 2013 in regards of Corporate Social Responsibility (CSR) do not mandatorily apply on your company,

### **CONTRACTS AND ARRANGEMENTS WITH RELATED PARTIES**

All contracts / arrangements / transactions, if any, entered by the Company during the financial year 2015-16 with related parties were in the ordinary course of business and on an arm's length basis. During the year, the Company has not entered into any contract / arrangement / transaction with related parties which could be considered material.

Your Directors draw attention of the members to Notes to the Financial Statements which sets out related party disclosures.

### **RISK MANAGEMENT POLICY**

In terms of the requirement of the Act, the Risk Management Policy is Not Applicable to your company.

### **SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS/ COURTS/ TRIBUNALS/ INCOME TAX**

During the year under review, no significant and material Orders were passed by the regulators or courts or tribunals or income tax dept, etc. impacting the going concern status and company's operations.

### **INTERNAL FINANCIAL CONTROLS**

The internal financial controls are commensurate with the size and nature of business of the Company.

### **DIRECTORS' RESPONSIBILITY STATEMENT**

Pursuant to the requirement clause (c) of sub-section (3) of Section 134 of the Companies Act, 2013, your Directors confirm that:

- (a) in the preparation of the annual accounts for the year ended 31.03.2016 the applicable accounting standards had been followed along with proper explanation relating to material departures;
- (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 as at 31.03.2016 and of the profit and loss of the Company for that period;

## SWAGTAM TRADING & SERVICES LIMITED

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

### TRANSFER OF AMOUNT TO INVESTOR EDUCATION AND PROTECTION FUND

Your Company did not have any funds lying unpaid or unclaimed for a period of seven years, therefore there were no funds which were required to be transferred to Investor Education and Protection Fund (IEPF).

### SHARE TRANSFER SYSTEM

Shares lodged for physical transfer are registered within a period of 15 days, if the documents are clear and complete in all respects. The shares duly transferred would be dispatched to the Shareholders upon approval of transfers. Adequate care is taken to ensure that, no transfers are pending for more than a fortnight. As bulk of the Company's shares are currently traded in dematerialized form, the transfers are processed and approved in the electronic form by NSDL / CDSL through their depository participants. Alankit Assignments Limited is the common Share Transfer Agent for both physical and dematerialised mode.

### PARTICULARS OF CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUT GO

Information required to be given pursuant to this Clause are given below:

#### A. CONSERVATION OF ENERGY

The company did not use any energy during the year under review. Your Company is conscious about its responsibility to conserve energy, power and other energy sources wherever possible. We emphasis towards a safe & clean environment & continue to adhere to all regulatory requirements & guidelines.

#### B. RESEARCH & DEVELOPMENT

Your Company has not imported any technology for any research and development.

#### C. TECHNOLOGY ABSORPTION

Your Company has not imported any technology; however, we believe and use information technology extensively in all spheres of our activities to improve efficiency levels.

#### D. FOREIGN EXCHANGE EARNINGS AND OUTGO.

	31.03.2016 (Amt.)	31.03.2015 (Amt.)
Foreign Exchange earning	Nil	Nil
Foreign Exchange outgoing	Nil	Nil

### DISCLOSURES

#### AUDIT COMMITTEE

Sr. No.	Name of the Director	Category of Director
1.	Mr. Raman Mittal	Chairman, Independent Director
2.	Ms. Lalita Mittal	Member, Executive Non-Independent Director
3.	Mr. Raj Kumar Gupta	Member, Independent Director

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### REMUNERATION AND NOMINATION COMMITTEE

Sr. No.	Name of the Director	Category of Director
1.	Mr. Raman Mittal	Chairman, Independent Director
2.	Mr. Sumit Gupta	Member, Non-Independent (Non Executive) Director
3.	Mr. Raj Kumar Gupta	Member, Independent Director

### SHAREHOLDERS / INVESTORS GRIEVANCE COMMITTEE

Sr. No.	Name of the Director	Category of Director
1.	Ms. Lalita Mittal	Member, Executive Non-Independent Director
2.	Mr. Raman Mittal	Chairman, Independent Director
3.	Mr. Sumit Gupta	Member, Non-Independent (Non Executive) Director

### APPRECIATION

Your Directors wish to place on record their deep thanks and gratitude to:

- a) The Directors acknowledge and would like to place on record the commitment and dedication on the part of the employees of your Company for their continued efforts in achieving good results.
- b) The Central and State Government as well as their respective Departments and Development Authorities connected with the business of the Company, Bankers of the Company as well as Stock Exchanges & Other Institutions for their co-operation and continued support.
- c) The Shareholders & Others for the trust and confidence reposed and to the Customers for their valued patronage.
- d) The Board also takes this opportunity to express its sincere appreciation for the efforts put in by the officers and employees at all levels in achieving the results and hopes that they would continue their sincere and dedicated endeavour towards attainment of better working results during the current year.

**By Order of Board of Directors  
Swagtam Trading & Services Limited**

**LALITA MITTAL  
WTD & CFO (DIN: 06928783)  
Address: F-22, House No. 148, Sector – 3,  
Rohini, Delhi – 110085**

**Date : 24.08.2016  
Place : New Delhi**

# SWAGTAM TRADING & SERVICES LIMITED

Form No. MGT-9

## EXTRACT OF ANNUAL RETURN

as on the financial year ended on 31st March 2016

### I. REGISTRATION AND OTHER DETAILS:

i) CIN	L51909DL1984PLC289131
ii) Registration Date	31st December, 1984
iii) Name of the Company	Swagtam Trading & Services Limited
iv) Category / Sub-Category of the Company	Public Company/ Limited by shares
v) Address of the Regd. Office	R-489, GF-A, Ground Floor, New Rajinder Nagar, New Delhi - 110060
vi) contact details	
a.) Website	www.swagtam.com
b.) Email i.d.	swagtam1984@gmail.com
c.) Phone No.	011 - 42475489
vii) Whether listed company	YES
	1) BSE Ltd.
	2) Calcutta Stock Exchange Ltd.
	3) Delhi Stock Exchange Ltd.
	(DSE stands de-recognised)
viii) Detail of RTA	
a.) Name	Alankit Assignments Limited
b.) Address	R. O. IE/13, Alankit Heights, Jhandewalan Extn., New Delhi – 55 C.O. : 205-208, Anarkali Complex, Jhandewalan Extn., New Delhi – 55
c.) Contact	011-42541234, 011-42541960 <a href="mailto:rta@alankit.com">rta@alankit.com</a>

### II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY

All the business activities contributing 10 % or more of the total turnover of the company shall be stated:-

Sl. No.	Name and Description of main products / services	NIC Code of the Product / service	% to total turnover of the company
1	Real Estate		55.34%
2	Jewellery		44.66%

### III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES

S. No.	Name and Address of the Company	CIN / GLN	Holding / Subsidiary	% of shares held	Applicable Section
	NIL				



## SWAGTAM TRADING & SERVICES LIMITED

### IV. SHARE HOLDING PATTERN

(Equity Share Capital Break up as percentage of Total Equity)

#### i) Category-wise Share Holding

Category Code	Category of Shareholder	No. of Shares held at the beginning of the year	% of total no. of shares	No. of Shares held at the end of the year	% of total no. of shares	% Change during the year
<b>(A)</b>	<b>Shareholding of Promoter and Promoter Group<sup>2</sup></b>					
<b>1</b>	<b>Indian</b>					
(a)	Individuals/ Hindu Undivided Family	0		0		
(b)	Central Government/ State Government(s)					
(c)	Bodies Corporate	49200	4.13	49200	4.13	0
(d)	Financial Institutions/ Banks					
(e)	Any Others(Specify)					
(e-i)						
(e-ii)						
	<b>Sub Total(A)(1)</b>	<b>49200</b>	<b>4.13</b>	<b>49200</b>	<b>4.13</b>	<b>0</b>
<b>2</b>	<b>Foreign</b>					
a	Individuals (Non-Residents Individuals/Foreign Individuals)	0		0		
b	Bodies Corporate	0		0		
c	Institutions	0		0		
d	Qualified Foreign Investor	0		0		
e	Any Others(Specify)	0		0		
e-i		0		0		
e-ii						
	<b>Sub Total(A)(2)</b>		<b>0</b>		<b>0</b>	
	<b>Total Shareholding of Promoter and Promoter Group (A)= (A)(1)+(A)(2)</b>	<b>49200</b>	<b>4.13</b>	<b>49200</b>	<b>4.13</b>	<b>0</b>
<b>(B)</b>	<b>Public shareholding</b>					
<b>1</b>	<b>Institutions</b>					
(a)	Mutual Funds/ UTI	0		0		
(b)	Financial Institutions / Banks	0		0		
(c)	Central Government/ State Government(s)	0		0		
(d)	Venture Capital Funds	0		0		
(e)	Insurance Companies	0		0		
(f)	Foreign Institutional	0		0		



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(g)	Investors Foreign Venture Capital. Investors	0		0		
(h)	Qualified Foreign Investor	0		0		
(i)	Any Other (specify)	0		0		
(i-ii)	Bodies Corporate	50000	4.20	50000	4.20	0
(i-ii)						
	<b>Sub-Total (B)(1)50000</b>	<b>4.20</b>	<b>50000</b>	<b>4.20</b>	<b>0</b>	
<b>B 2</b>	<b>Non-institutions</b>					
(a)	Individuals					
I	i. Individual shareholders holding nominal share capital up to ₹ 2 lakhs	490700	41.22	490700	41.22	0
II	ii. Individual shareholders holding nominal share capital in excess of ₹ 2 lakhs	600600	50.45	600600	50.45	0
(c)	Qualified Foreign Investor					
(d)	Any Other (specify)	0		0		
(d-i)						
(d-ii)						
	<b>Sub-Total (B)(2)</b>	<b>1091300</b>	<b>91.67</b>	<b>1091300</b>	<b>91.67</b>	<b>0</b>
<b>(B)</b>	<b>Total Public Shareholding (B)= (B)(1)+(B)(2)</b>	<b>1141300</b>	<b>95.87</b>	<b>1141300</b>	<b>95.87</b>	<b>0</b>
	<b>TOTAL (A)+(B)</b>	<b>1190500</b>	<b>100.00</b>	<b>1190500</b>	<b>100.00</b>	<b>0</b>
<b>(C)</b>	<b>Shares held by Custodians and against which Depository Receipts have been issued</b>					
1	Promoter and Promoter Group					
2	Public					
	<b>Sub-Total (C)</b>	<b>0</b>		<b>0</b>		
	<b>GRAND TOTAL (A)+(B)+(C)</b>	<b>1190500</b>	<b>100.00</b>	<b>1190500</b>	<b>100.00</b>	<b>0</b>

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### (ii) Shareholding of Promoters

Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Shareholding at the end of the year		%change in shareholding during the year
		No. of Shares	% of Shares Pledged / encumbered	No. of Shares	% of Shares Pledged / encumbered	
1	Duncan Macneill Construction & Developers Ltd.	12000	0	12000	0	0
2	Buckingham Industries Ltd	12000	0	12000	0	0
3	Jeewan Commercial Ltd.	12000	0	12000	0	0
4	ACEC India Pvt Ltd	1200	0	1200	0	0
5	East West Properties Pvt Ltd	12000	0	12000	0	0
	<b>TOTAL</b>	<b>49200</b>		<b>49200</b>		

### (iii) Change in Promoters' Shareholding: NO CHANGE DURING THE YEAR

Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
1	<b>Duncan Macneill Construction &amp; Developers Ltd.</b>				
	At the Beginning of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>
	At the End of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>

Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
2	<b>Buckingham Industries Ltd.</b>				
	At the Beginning of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>
	At the End of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>

Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
3	<b>Jeewan Commercial Ltd.</b>				
	At the Beginning of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>
	At the End of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>

Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
4	<b>ACEC India Pvt. Ltd.</b>				
	At the Beginning of the year	<b>1200</b>	<b>0.10</b>	<b>1200</b>	<b>0.10</b>
	At the End of the year	<b>1200</b>	<b>0.10</b>	<b>1200</b>	<b>0.10</b>

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Sl. No.	Name of Promoter	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
5	<b>East West Properties Pvt. Ltd.</b>				
	At the Beginning of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>
	At the End of the year	<b>12000</b>	<b>1.01</b>	<b>12000</b>	<b>1.01</b>

**(iv) Shareholding Pattern of TOP TEN Shareholders : NO CHANGE DURING THE YEAR (other than Directors, Promoters and Holders of GDRs and ADRs):**

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
1	<b>Richa Agarwal</b>				
	At the Beginning of the year	<b>60000</b>	<b>5.04</b>	<b>60000</b>	<b>5.04</b>
	At the End of the year	<b>60000</b>	<b>5.04</b>	<b>60000</b>	<b>5.04</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
2	<b>Veena Gupta</b>				
	At the Beginning of the year	<b>50000</b>	<b>4.20</b>	<b>50000</b>	<b>4.20</b>
	At the End of the year	<b>50000</b>	<b>4.20</b>	<b>50000</b>	<b>4.20</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
3	<b>Sumit Gupta</b>				
	At the Beginning of the year	<b>45000</b>	<b>3.78</b>	<b>45000</b>	<b>3.78</b>
	At the End of the year	<b>45000</b>	<b>3.78</b>	<b>45000</b>	<b>3.78</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
4	<b>Rajesh Gupta</b>				
	At the Beginning of the year	<b>40000</b>	<b>3.36</b>	<b>40000</b>	<b>3.36</b>
	At the End of the year	<b>40000</b>	<b>3.36</b>	<b>40000</b>	<b>3.36</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
5	<b>Seema Gupta</b>				
	At the Beginning of the year	<b>40000</b>	<b>3.36</b>	<b>40000</b>	<b>3.36</b>
	At the End of the year	<b>40000</b>	<b>3.36</b>	<b>40000</b>	<b>3.36</b>

## SWAGTAM TRADING & SERVICES LIMITED

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
6	<b>Sunita Rani</b>				
	At the Beginning of the year	<b>37500</b>	<b>3.15</b>	<b>37500</b>	<b>3.15</b>
	At the End of the year	<b>37500</b>	<b>3.15</b>	<b>37500</b>	<b>3.15</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
7	<b>Amit Gupta</b>				
	At the Beginning of the year	<b>37100</b>	<b>3.12</b>	<b>37100</b>	<b>3.12</b>
	At the End of the year	<b>37100</b>	<b>3.12</b>	<b>37100</b>	<b>3.12</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
8	<b>Rakesh Kumar Garg</b>				
	At the Beginning of the year	<b>31000</b>	<b>2.60</b>	<b>31000</b>	<b>2.60</b>
	At the End of the year	<b>31000</b>	<b>2.60</b>	<b>31000</b>	<b>2.60</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
9	<b>Aayush Aggarwal</b>				
	At the Beginning of the year	<b>30000</b>	<b>2.52</b>	<b>30000</b>	<b>2.52</b>
	At the End of the year	<b>30000</b>	<b>2.52</b>	<b>30000</b>	<b>2.52</b>

Sl. No.	Name of Shareholder	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
10	<b>Anita Aggarwal</b>				
	At the Beginning of the year	<b>30000</b>	<b>2.52</b>	<b>30000</b>	<b>2.52</b>
	At the End of the year	<b>30000</b>	<b>2.52</b>	<b>30000</b>	<b>2.52</b>

### (v) Shareholding of Directors and Key Managerial Personnel : NO CHANGE DURING THE YEAR

Sl. No.	Name of Director/KMP	Shareholding at the beginning of the year		Cumulative Shareholding during the year	
		No. of shares	% of total shares	No. of shares	% of total shares
1	<b>Sumit Gupta Director - w.e.f. 29.01.2015</b>				
	At the Beginning of the year	<b>45000</b>	<b>3.78</b>	<b>45000</b>	<b>3.78</b>
	At the End of the year	<b>45000</b>	<b>3.78</b>	<b>45000</b>	<b>3.78</b>

## SWAGTAM TRADING & SERVICES LIMITED

### V. INDEBTEDNESS

Indebtedness including interest outstanding/accrued but not due for payment

	Secured Loans excluding deposits	Unsecured Loans / Advances	Deposits
<b>Indebtedness at the beginning of the financial year</b>	<b>NIL</b>		<b>NIL</b>
i) Principal Amount		<b>66,610</b>	
ii) interest due but not paid		<b>0</b>	
iii) interest accrued but not due.		<b>0</b>	
<b>Total (i+ii+iii)</b>	<b>NIL</b>	<b>66,610</b>	<b>NIL</b>
<b>Change in Indebtedness during the financial year</b>			
* Addition		<b>66,610</b>	
* Reduction			
<b>Net Change</b>	<b>NIL</b>	<b>66,610</b>	<b>NIL</b>
<b>Indebtedness at the end of the Financial Year</b>	<b>NIL</b>		<b>NIL</b>
i) Principal Amount		<b>0</b>	
ii) Interest due but not paid		<b>0</b>	
iii) Interest accrued but not due		<b>0</b>	
<b>Total (i+ii+iii)</b>	<b>NIL</b>	<b>0</b>	<b>NIL</b>

### VI. Remuneration To Managing Director, Wholetime Ditectors and/or Manager

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

Sl. no	Particulars of Remuneration	Total Amount (Rs.)	
		per month	per year
	<b>LALITA MITTAL (WTD &amp; CFO)</b>		
1	Gross salary		
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	<b>20,000</b>	<b>2,40,000</b>
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	<b>0</b>	
	(c) profit in lieu of salary under section 17(3) income tax Act, 1961	<b>0</b>	
2	Stock Option	<b>0</b>	
3	Sweat Equity	<b>0</b>	
4	Commission - as % of Profit - Other Specify.....	<b>0</b>	
5	Others, please specify	<b>0</b>	
	<b>Total (A)</b>	<b>20,000</b>	<b>2,40,000</b>
	Ceiling as per the Act		

## SWAGTAM TRADING & SERVICES LIMITED

### B. REMUNERATION TO OTHER DIRECTORS:

Sl. no	Particulars of Remuneratinn	per month	per year
1	Independent Director *Fee for attending Board Committee Meeting * Commission *Other, Please Specify	NIL	NIL
	Total (1)	NIL	NIL
2	Other Non-Executive Directors *Fee for attending board Committee Meeting *Commission *Other, Please Specify	NIL	NIL
	Total (2)	NIL	NIL
	Total (B)=(1+2)	NIL	NIL
	Total Managerial Remuneration Overall Ceiling as per the Act	NIL	NIL

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

Sl. no	Particulars of Remuneratinn	per month	per year
1	Company Secretary-Ms. Sheetal Bansal ACS-38208	15000	19000
2	Company Secretary-Mrs. Sonia Rani ACS-36984 w.e.f. 25.05.2015	15000	147500
			166500

### VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act		Appeal made, if any (Details)
<b>A. COMPANY</b>			
Penalty		NIL	NIL
Punishment		NIL	NIL
Compounding		NIL	NIL
<b>B. DIRECTOR</b>			
Penalty		NIL	NIL
Punishment		NIL	NIL
Compounding		NIL	NIL
<b>C. OTHER OFFICERS IN DEFAULT</b>			
Penalty		NIL	NIL
Punishment		NIL	NIL