

# SHELTER INFRA PROJECTS LIMITED

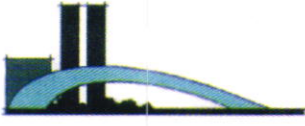
(formerly CCAP Limited)

REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR -V, SALT LAKE CITY, KOLKATA - 700 091

PH.: 2357 - 6255 / 4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www.ccapltd.in, CIN - L45203WB1972PLC028349



Dated: 29.05.2023

To,  
The Secretary,  
Bombay Stock Exchange Limited  
PhirozeJeejeebhoy Tower  
Dalal Street,  
Mumbai-400001

Scrip Code: BSE: 526839

To,  
The Secretary  
The Calcutta Stock Exchange Limited  
7, Lyons Range,  
Kolkata- 700 001

Scrip Code: CSE: 13077

Dear Sir,

**Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2023**

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are forwarding herewith the Annual Secretarial Compliance Report for the Financial Year 2022-23.

You are requested to kindly take the above information on record.

Thanking You,  
Yours faithfully,

For SHELTER INFRA PROJECTS LIMITED

*Dharmendra Kumar Singh*

Dharmendra Kumar Singh  
(Company Secretary & Compliance officer)

Encl: as above



---

## ANNUAL SECRETARIAL COMPLIANCE

### FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH 2023

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

TO  
The Members,  
SHELTER INFRA PROJECTS LIMITED  
ETERNITY BUILDING DN-1, SECTOR - V, SALT LAKE,  
KOLKATA (WB) -700091

I have examined:

- (a) all the documents and records made available to us and explanation provided by the company.
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31 ST MARCH 2023 respect of compliance with the provisions of :

- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined,

Include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not Applicable)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (Not Applicable)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable)



- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not Applicable)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not Applicable)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And circulars/ guidelines issued there under and based on the above examination, I hereby report that during the review period:

a) The listed entity has complied with the provisions of the above Regulations and circulars / Guidelines issued thereunder, except in respect of matters specified below:

• Refer Annexure “A” annexed to the Report

b) The listed entity has taken the following actions to comply with the observations made in previous reports:

• Refer Annexure “B” annexed to the Report

I further report that –

• There was no event of appointment/ re-appointment/ resignation of Statutory Auditors of the Listed Entity during the review period and the Listed Entity has not modified the terms of appointment of its existing Auditor.

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS*
1	<b>Secretarial Standards:</b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Not Any
2	<b>Adoption and timely updation of the Policies:</b>  ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	Not Any



	<ul style="list-style-type: none"><li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li></ul>		
3	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate section on the website</li><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</li></ul>	Yes	Not Any
4	<b>Disqualification of Director:</b> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	Not Any
5	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> <ul style="list-style-type: none"><li>(a) Identification of material subsidiary companies</li><li>(b) Disclosure requirement of material as well as other subsidiaries</li></ul>	Na	The Company does not have any subsidiary
6	<b>Preservation of Documents:</b> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	Not Any
7	<b>Performance Evaluation:</b> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations</p>	Yes	Not Any
8	<b>Related Party Transactions:</b> <ul style="list-style-type: none"><li>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</li><li>(b) The listed entity has provided detailed reasons</li></ul>	Yes	Not Any



	along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.		
9	<b>Disclosure of events or information:</b> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under.	Yes	Not Any
10	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Not Any
11	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued there under except as provided under separate paragraph herein (**).	Na	Not Any
12	<b>Additional Non-compliances, if any:</b> No additional non-compliance observed for any SEBI regulation/circular/guidance note etc	Na	Not Any

**Annexure "A"**

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Com-pliance Require-ment (Regu-lations/ circulars/ guide- lines including specific clause)	Regu-lation/ Circular No.	Deviati- ons	Action Taken by	Type of Action	Details of Violation	Fine Amount	Obser- vations/ Remarks of the Practicin- g Company Secretary	Man- age- ment Re- sponse	Re- marks



<b>Regulation 33:</b> The listed entity shall submit annual audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report.	<b>Regulation 33</b>	Non-submission of the financial results within the period prescribed under the regulation.	SEBI	Fine	Due To Late Submission Of Financial Results. Rs. 5,000/- per day till the date of compliance has been imposed.	Rs. 20,000/-	Due to unavoidable circumstances the late submission has been done.	Management was aware and had taken forward steps to rectify it.	Company had taken Proper steps regarding this.
---	----------------------	--	------	------	--	--------------	---	---	--

**Annexure “B”**

The listed entity has taken the following actions to comply with the observations made in previous reports:

Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary
<b>Not Any</b>	<b>N.A</b>	<b>Not Any</b>	<b>Not Any</b>	<b>Not Any</b>	<b>Not Any</b>	<b>NIL</b>	<b>Not Any</b>

SOMA SAHA  
CVAPS7554J  
COMPANY SECRETARY

**C.S. SOMA SAHA**

10. Old Post Office Street,  
Room No: 42A, 1<sup>st</sup> floor,  
Right Block  
M: 9903273883  
Email Id – [saha.soma21@gmail.com](mailto:saha.soma21@gmail.com)  
PAN NO: CVAPS7554J

---

Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. My responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

Signature: *Soma Saha.*  
Name of the Practicing Company Secretary  
SOMA SAHA  
ACS/ FCS No.:33125  
CP No.:12237  
UDIN : **A033125E000379405**  
PR No:1905

Place: **KOLKATA**  
Date: **25.05.2023**

