

SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)



REGD. AND HEAD OFFICE

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

PH. : 4003 2290

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

Dated: 27.05.2024

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range, Dalhousie
Kolkata - 700001

Scrip Code: BSE: 526839

Scrip Code: CSE: 13077

Dear Sir,

Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2024

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 2023-24.

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

Thanking You,
Yours faithfully,

For SHELTER INFRA PROJECTS LIMITED

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

Encl: as above

C.S. SOMA SAHA

10. Old Post Office Street,
Room No: 42A, 1st floor,
Right Block
M: 9903273883
Email Id – saha.soma21@gmail.com
PAN NO: CVAPS7554J

SECRETARIAL COMPLIANCE REPORT OF SHELTER INFRA PROJECTS LIMITED FOR THE YEAR ENDED 31.03.2024.

I have examined:

- (a) All the documents and records made available to us and explanation provided by **Shelter Infra Projects Limited** ("the listed entity"),
- (b) The filings or submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) Any other document or filing, as may be relevant, that has been relied upon to make this certification,

for the year ended 31st March, 2024 ("Review Period") in respect of compliance with the provisions of:

- (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, Circulars, and Guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder, and the Regulations, Circulars, and Guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific regulations, whose provisions and the circulars and guidelines issued thereunder 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 (ShareBased 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;

(i) (Other regulations as applicable)

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

(a) The listed entity has complied with the provisions of the above regulations and circulars/guidelines issued there under, 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 hereby report that, during the Review Period

Sr. No.	Particulars	Compliance Status(Yes/No/NA)	Observations/Remarks by PCS*
1.	Secretarial Standards: The compliance of the listed entity is in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).	YES	NOT ANY
2.	Adoption and timely updating of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of the board of directors of the listed entities.All the policies are in conformity with SEBI Regulations and have been reviewed and updated on time, as per the regulations, circulars, and guidelines issued by SEBI.	YES	NOT ANY



3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The listed entity is maintaining a functional website. Timely dissemination of the documents and information under a separate section on the website Web Links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific and redirect to the relevant document(s) or section of the website. 	YES	NOT ANY
4.	Disqualification of Director: <ul style="list-style-type: none"> None of the directors of the company are disqualified under Section 164 of the Companies Act, 2013. 	YES	NOT ANY
5.	Details related to subsidiaries of listed entities have been examined, w.r.t.: <ul style="list-style-type: none"> (a) Identification of material subsidiary companies (b) Requirements with respect to Disclosure of material as well as other subsidiaries 	NA	The Company does not have any subsidiary



Sr. No.	Particulars	Compliance Status(Yes/No/NA)	Observations /Remarks by PCS*
6.	<p>Preservation of Documents:</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposing of records as per the Policy of Preservation of Documents and Archival Policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	NOT ANY
7.	<p>Performance Evaluation:</p> <p>The listed entity has conducted performance evaluations of the Board, Independent Directors, and Committees at the start of every financial year or during the financial year as prescribed in SEBI Regulations.</p>	YES	NOT ANY
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval from the Audit Committee for all related party transactions; or</p> <p>(b) In case no prior approval obtained, the listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee.</p>	YES	NOT ANY
9.	<p>Disclosure of events or information:</p> <p>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.</p>	NO	<p>Compliances with regard to applicable regulations to the Calcutta Stock Exchange of India had not been made on the portal for the past years. The company is providing the intimations and fulfilling the compliances via posts and mails due to the non-availability of the User ID and Password of the CSE Portal, and now it has been rectified and properly maintained and notified to the Calcutta Stock Exchange Portal.</p>



10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulations 3(5) and 3(6) of the of the SEBI (Prohibition of Insider Trading) Regulations, 2015.	YES	NOT ANY
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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 (or) The actions taken against the listed entity/ its promoters/ directors/subsidiaries either by SEBI or by Stock Exchanges are specifies in the last column.	YES	There have been no actions from the SEBI but inquiries and summons have been raised by ROC Ranchi, Jharkhand.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries In case of resignation of statutory auditor from the listed company or any of its material subsidiaries during the financial year, the listed entity and/ or its material subsidiary(is) has/ have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by Listed Entities.	NO	NOT ANY
13.	Additional non-compliances, if any: a. No additional non-compliance was observed for any SEBI regulation/circular/guidance note etc except as reported above. b. The terms of appointment of independent Director	YES NO	CSE matter as per Annexure A The independent Director terms expired on 09.04.2023. However the company was in the process of reappointment of independent director and who was reappointment on 18.07.2023



Annexure "A":

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

Sr. No.	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	Management Response	Remarks
1	ALL COMPLIANCE S	ALL APPLICABLE REGULATIONS	NOT HAVING ACCESS ON THE PORTAL OF CALCUTTA STOCK EXCHANGE	THE CALCUTTA STOCK EXCHANGE LIMITED VIDE LETTER DATED 13.11.2023		COMPANY HAS NOT COMPLIED WITH THE LISTING REQUIREMENTS AND FILING REQUIREMENTS, ALONG WITH THE NON-PAYMENT OF ANNUAL LISTING FEES TO THE EXCHANGE FOR A CONSIDERABLE PERIOD OF TIME.		THE COMPANY MADE ALL COMMUNICATIONS TO THE STOCK EXCHANGE VIA MAILS AND POSTS BUT THE COMPANY FAILED TO UPDATE IN THE PORTAL DUE TO THE NON-AVAILABILITY OF USER ID AND PASSWORD OF THE PORTAL BUT VERY RECENTLY THE PASSWORD AND USER ID OF THE PORTAL WERE RETRIEVED, AND COMPLIANCE HAS STARTED.	THE COMPANY HAS MADE PROPER COMMUNICATION TO THE STOCK EXCHANGE S VIA MAILS AND POSTS BUT NOT UPDATED ON THE PORTAL DUE TO NOT HAVING THE ACCESS OF THE PORTAL WHICH IS DULY RECTIFIED AND UPDATED IN THE PORTAL IN THE DUE COURSE OF TIME AS ON CURRENT DATE.	



ANNEXURE "B"

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

Sr. No.	Observations/Remarks of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2023	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of Violation/ deviations and actions taken/ penalty imposed, if any, on the listed entity	Remedial Actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
	NOT ANY	NA	NOT ANY	NOT ANY	NIL	NA

(c) The following are the details of actions taken against the listed entity, its promoters, directors, or material subsidiaries either by SEBI or by stock exchanges, Registrar of Companies (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts, Regulations, and circulars or guidelines issued there under:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	Dr. Abhishek Kumar, ICLS (Asst. ROC cum Asst Official Liquidator and Inspecting Officer) Office of Registrar of Companies cum Official liquidator, Ranchi, Jharkhand	Order under Section 206(4) of the Companies Act, 2013—in the matter of 11417s ShelterInfra Projects Limited (CIN: L45203WB1972PLCO28349)	Inquiry against the company in exercise of the powers under Section 206(4) of the Companies Act, 2013	As per the notice letter dated 12.02.2024 of the concerned authority, since the notice was received beyond the expected time frame, the company mailed on 21.02.2024 for an extension of some more days with regard to arranging the required documents, and via mail



				and letter dated 26.02.2024, they have sent the documents they managed to arrange so far as on that date.
2	Dr. Abhishek Kumar, ICLS (Asst. ROC cum Asst Official Liquidator and Inspecting Officer) Office of Registrar of Companies cum Official liquidator, Ranchi, Jharkhand	Summon under Section 207(3)(b) of the Companies Act, 2013—in the matter of 11417s Shelter Infra. Projects Limited (CIN: L45203WB1972PLCO28349)	In exercise of powers vested Under section 207(3)(b) of the Companies Act, 2013, Directors and KMPs are hereby summoned to appear personally, for the Inquiry Officer in his chamber on 29.02.2024 at 01:00 A. M. at the office of the Registrar of Companies-cum-Official Liquidator, Jharkhand, Ministry of Corporate Affairs; Mangal Tower; 4th Floor, Old Hazari bagh Road; Near Kanta Toli Chowk, Ranchi 834001, Jharkhand for them Examination on oath and not to depart until they receive permission to do so.	Directors along with KMPs who had been summoned duly appeared physically before the concerned authority on the specified date and due time. Directors who could not attend physically had submitted their applications on the medical grounds. The matter is currently under observation of Ministry of Corporate Affairs.

Place: KOLKATA
Date: 25.05.2024

Signature: *Soma Saha*
Name of the Practicing Company Secretary:
CS.SOMA SAHA
ACS/ FCS No.: 33125
C P No.:12237
UDIN: A033125F000449057
PR No. :1905

