

# SARNIMAL INVESTMENT LIMITED

REGD OFF: 508, 5th Floor, Arunachal Building, Barakhamba Road, New Delhi - 110001

Email: sarnimalinvestltd@gmail.com, website: www.sarnimal.com

CIN: L65100DL1981PLC012431

PH: 011-22481097

To,

Dated: 30.05.2022

Metropolitan Stock Exchange of India Limited  
Vibgyor Towers, 4th Floor, Plot No. C 62, G-Block,  
Opp. Trident Hotel, BandraKurla Complex,  
Bandra East,  
Mumbai-400098

Dear Sir/Madam

**Re: Outcome of Board Meeting**

This is to inform you that the Board of Directors at the meeting held today, i.e. May 30, 2022, inter alia transacted the following business:

The Board have considered and approved the Audited Financial Results of the Company, for Quarter/Year ended 31<sup>st</sup> March 2022 along with Auditor's Report based upon unmodified opinion of M/s G A M S & ASSOCIATES LLP, Statutory auditor of the Company on the Financial Statement. The Financial Results were reviewed and recommended by the Audit Committee. Accordingly we enclosed following:

1. Audited Financial Results for the Quarter and year ended on 31<sup>st</sup> March, 2022.
2. Auditor's Report issued on the Financial Results.
3. A Declaration from the CFO as required pursuant to Regulation 33(3) of the Listing Regulations, regarding unmodified opinion of Statutory Auditors on the Financial Results.

A copy of the said results together with the Auditor's Report is also being made available on the website: www.sarnimal.com.

The Board meeting commenced at **5:35 P.M** (IST) and concluded at **6:00 P.M** (IST).

This is for your information and record.

Thanking You

Yours Truly,

**For Sarnimal Investment Limited**

  
**Nitin Agarwal**

(Managing Director)

DIN: 03122245

**Encl: As Above**

**SARNIMAL INVESTMENT LIMITED**

CIN:- L65993DL1981PLC012431

Email-sarnimalinvestltd@gmail.com

Address:-508, 5th Floor, Arunachal Building, Barakhamba Road, New Delhi - 110001

**AUDITED FINANCIAL RESULTS FOR THE QUARTER YEAR ENDED 31st MARCH, 2022**

(Rs. in Lakh, except per share data)

Particulars	QUARTER ENDED			YEAR ENDED	
	31.03.2022	31.12.2021	31.03.2021	31.03.2022	31.03.2021
Revenue from Operations	11.12	-	58.76	11.12	70.31
Other Income	-	2.26	-	9.51	-
<b>Total Income (A)</b>	<b>11.12</b>	<b>2.26</b>	<b>58.76</b>	<b>20.63</b>	<b>70.31</b>
<b>Expenses</b>					
Cost of Materials Consumed	-	-	-	-	-
Purchases of Stock-in-Trade	10.58	-	-	10.58	-
Changes in Inventories of Finished Goods, Work-in-Progress and Stock-in-Trade	-	-	11.14	-	11.14
Employee Benefits Expense	0.96	0.70	1.00	5.26	1.97
Finance Costs	-	0.70	20.53	1.30	28.33
Depreciation/ Amortisation and Depletion Expense	-	-	-	-	-
Contingent Provision for Standard Assets (@0.4% of outstanding standard assets as per RBI Notification)	-	-	-	-	-
Other Expenses	0.59	0.68	26.40	2.55	28.69
<b>Total Expenses (B)</b>	<b>12.13</b>	<b>2.08</b>	<b>59.07</b>	<b>19.69</b>	<b>70.13</b>
<b>Profit Before Share of Profit/(Loss) of Associates and Joint Ventures, Exceptional Item and Tax (A-B)</b>	<b>(1.01)</b>	<b>0.18</b>	<b>(0.31)</b>	<b>0.94</b>	<b>0.18</b>
Share of Profit/(Loss) of Associates and Joint Ventures	-	-	-	-	-
<b>Profit Before Exceptional Item and Tax</b>	<b>(1.01)</b>	<b>0.18</b>	<b>(0.31)</b>	<b>0.94</b>	<b>0.18</b>
Exceptional Item	-	-	-	-	-
<b>Profit Before Tax</b>	<b>(1.01)</b>	<b>0.18</b>	<b>(0.31)</b>	<b>0.94</b>	<b>0.18</b>
<b>Tax Expenses</b>					
Current Tax	0.24	-	(0.19)	0.24	0.05
Deferred Tax	-	-	-	-	-
Earlier Year Tax adjustment	-	-	-	-	-
MAT Credit Entitlement	-	-	-	-	-
<b>Profit for the Period</b>	<b>(1.25)</b>	<b>0.18</b>	<b>(0.12)</b>	<b>0.70</b>	<b>0.13</b>
<b>Total Other Comprehensive Income (Net of Tax)</b>					
<b>Total Comprehensive Income</b>	<b>(1.25)</b>	<b>0.18</b>	<b>(0.12)</b>	<b>0.70</b>	<b>0.13</b>
<b>Earnings per equity share (Face Value of Rs.1/-)</b>					
(a) Basic	0.00	0.000	(0.000)	0.0015	0.000
(b) Diluted	0.00	0.000	(0.000)	0.0015	0.000
<b>Paid up Equity Share Capital, Equity Shares of Rs.1/- each.</b>	<b>449.80</b>	<b>449.80</b>	<b>449.80</b>	<b>449.80</b>	<b>449.80</b>

Notes:-

- The above financial results for the quarter ended 31st March, 2022 have been reviewed by the Audit Committee and thereafter approved by the Board of Directors in its meeting held on 30.05.2022
- The Auditor Report by the Statutory Auditors for the year as required under regulation 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 has been completed and the related report is being forwarded to Stock Exchange.
- The Company operates in a single segment. Hence, segment reporting as required under Accounting Standard 17 issued by the Institute of Chartered Accountants of India is not applicable.
- Previous Period's figures have been regrouped/rearranged wherever considered necessary
- The above is as per clause 33 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

For and on behalf of the Board  
Sarnimal Investment Limited

Nitin Agarwal  
(Managing Director)  
DIN: 03122245



Date: 30.05.2022  
Place: Delhi

## STATEMENT OF ASSETS AND LIABILITIES

(Rs. In lakh)

Particular	As at 31st March 2022	As at 31st March 2021
<b>ASSETS</b>		
<b>Non-Current Assets</b>		
Property, Plant and Equipment	0	-
Capital Work-in-Progress	-	-
Goodwill	-	-
Other Intangible Assets	-	-
Intangible Assets Under Development	-	-
<b>Financial Assets</b>		
Investments	-	-
Trade Receivables	-	-
Investments in Subsidiary	-	-
Loans	-	-
Deferred Tax Assets (net)	0.57	0.56
Other Non-Current Assets	408.92	405.51
<b>Total Non-Current Assets (A)</b>	<b>409.49</b>	<b>406.07</b>
<b>Current Assets</b>		
Inventories	-	-
<b>Financial Assets</b>		
Investments	-	55.45
Trade Receivables	4.70	4.700
Cash & Cash Equivalents	36.40	7.56
Loans	-	-
Other Financial Assets	-	-
Other Current Assets	17.25	15.67
<b>Total Current Assets (B)</b>	<b>58.35</b>	<b>83.38</b>
<b>Total Assets (A+B)</b>	<b>467.84</b>	<b>489.45</b>
<b>EQUITY AND LIABILITIES</b>		
<b>Equity</b>		
Equity Share Capital	449.80	449.80
Other Equity (Reserve & Surplus)	11.78	11.10
<b>(A)</b>	<b>461.58</b>	<b>460.90</b>
<b>Liabilities</b>		
<b>Non-Current Liabilities</b>		
<b>Financial Liabilities</b>		
Borrowings	-	-
Other Financial Liabilities	-	-
Deferred Payment Liabilities (net)	-	-
Provisions	-	-
Deferred Tax Liabilities	-	-
<b>Total Non-Current Liabilities (B)</b>	<b>-</b>	<b>-</b>
<b>Current Liabilities</b>		
<b>Financial Liabilities</b>		
Borrowings	-	-
Trade Payables	-	-
Other Financial Liabilities	-	21.03
Other Current Liabilities	4.37	5.85
Provisions	1.88	1.66
<b>Total Current Liabilities (C)</b>	<b>6.25</b>	<b>28.55</b>
<b>Total Liabilities (B+C)</b>	<b>6.25</b>	<b>28.55</b>
<b>Total Equity and Liabilities (A+B+C)</b>	<b>467.84</b>	<b>489.45</b>

For and on behalf of the Board  
Sarnimal Investment Limited

Nitin Agarwal  
(Managing Director)  
DIN: 03122245

Date: 30.05.2022  
Place: Delhi

**Sarnimal Investment Limited**  
CIN NO. L65100DL1981PLC012431  
Cash Flow Statement as on 31st March, 2022

		(Amount in Rs.)	
	Particulars	For the Year Ended March 31, 2022	For the Year Ended March 31, 2021
A.	<b>Cash flow from operating activities</b>	93,708.00	13,130.80
	Profit/(loss) before tax		
	Adjusted for:		
	Depreciation and amortisation expense		
	Leasehold prepayments amortisation		
	Interest income		
	Finance cost		
	Proceeds from long-term borrowings		
	Gain on mark to market of investments		
	(Profit)/loss on sale of property, plant and equipment (net)		
	Net (gain)/loss on foreign currency transactions and translation		
	Provision for Standard assets		274,360.70
	Deferred Government grant transferred		
	<b>Operating profit/(loss) before working capital changes</b>	93,708.00	287,491.59
	Adjusted for:		
	(Increase)/Decrease in trade receivables		(470,324.00)
	(Increase)/Decrease in inventories		1,113,756.00
	(Increase)/Decrease in other assets	(157,505.00)	(437,732.44)
	Increase/(Decrease) in trade payables		
	(Increase)/Decrease in Short Term loans & Advances		
	Increase/(Decrease) in other liabilities	(2,252,152.00)	(70,654,821.31)
	Increase/(Decrease) in provisions		(299,789.18)
		<b>(2,409,657.00)</b>	<b>(70,748,910.93)</b>
	<b>Cash generated from operations</b>	<b>(2,315,949.00)</b>	<b>(70,461,419.34)</b>
	Net Income taxes (paid) / refunds	(4,614.00)	
	<b>Net cash from operating activities</b> A	<b>(2,320,563.00)</b>	<b>(70,461,419.34)</b>
B.	<b>Cash flow from investing activities</b>		
	Capital expenditure on property, plant and equipments including capital advances		
	Sale of property, plant and equipments		
	Purchases of investments		
	Sale of investments	5,545,000.00	
	Loans and Advances	(340,638.50)	68,605,750.50
	Interest received		
	Finance Cost		
	Bank balances not considered as cash and cash equivalents		
	-Deposits placed		
	-Deposits matured		
	<b>Net cash used in investing activities</b> B	<b>5,204,361.50</b>	<b>68,605,750.50</b>
C.	<b>Cash flow from financing activities</b>		
	Proceeds from long-term borrowings		
	Proceeds from short term borrowings		
	Repayment of long-term borrowings		
	Repayment of short-term borrowings		
	Interest and finance charges paid		
	<b>Net cash used in financing activities</b> C		
	Net (decrease) / increase in cash and cash equivalents A+B+C	<b>2,883,798.50</b>	<b>(1,855,668.84)</b>
	Cash and cash equivalents as at the beginning of the year	756,363.12	2,612,031.96
	<b>Cash and cash equivalents as at the End of the year</b>	<b>3,640,162</b>	<b>756,363</b>

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

In terms of our report attached of the even date

(0)

For And on Behalf of the Board  
Sarnimal Investment Limited

Sudhir Kumar Aggarwal  
(Director)  
DIN-00024935



Date: 30.05.2022  
Place: New Delhi

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Dated: 30.05.2022

Metropolitan Stock Exchange of India Limited  
Vibgyor Towers, 4th Floor, Plot No. C 62, G-Block,  
Opp. Trident Hotel, BandraKurla Complex,  
Bandra East,  
Mumbai-400098

Dear Sir/Madam

**Sub: Declaration of the Auditor's Report with Unmodified opinion under Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015**

I, Nitin Agarwal, Chief Financial Officer of the Company, in compliance with Regulation 33(3)(d) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 hereby declare that Statutory auditor of the Company that of M/s G A M S & ASSOCIATES LLP, (Firm Registration No. N500094) have issued the Auditor's Report with unmodified opinion in respect of the Audited Financial results of the Company for the Financial Year ended on March 31, 2022.

This is for your information and record.

Thanking You

Yours Truly,

For Sarnimal Investment Limited

  
Nitin Agarwal

Chief Financial Officer

PAN: AMWPA6693F



# SARNIMAL INVESTMENT LIMITED

REGD OFF: 439, VIKAS MARG, JAGRITI ENCLAVE DELHI-110092

Email:sarnimalinvestltd@gmail.com, website: www.sarnimal.com

CIN: L65100DL1981PLC012431

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To,

Date: 30/05/2022

Metropolitan Stock Exchange of India Limited  
Vibgyor Towers, 4th Floor, Plot No. C 62, G-Block,  
Opp. Trident Hotel, BandraKurla Complex,  
Bandra East,  
Mumbai-400098

**Sub: - Undertaking regarding Non-Applicability of Statement of Deviation(s) or Variations(s) under Regulation 32 of the SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015**

Dear Sir/Madam,

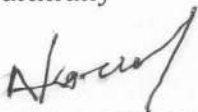
Pursuant to the Regulation 32 of the Securities and Exchange Board of India (Listing Obligations And Disclosure Requirements) Regulations, 2015, the Company hereby confirms, that there has been no deviation(s) or variations(s) in the use of public issue proceeds raised from the Initial Public Offer (IPO).

Therefore, in terms of the said regulation, the company is not required to submit the Statement of deviation(s) or variations(s).

Kindly take the above information on records.

Thanking you,

Yours Faithfully



For SARNIMAL INVESTMENT LIMITED



**NITIN AGARWAL**

(Director)

DIN: 03122245



**INDEPENDENT AUDITOR'S REPORT  
TO THE MEMBERS OF SARNIMAL INVESTMENTS LIMITED**

**I. Report on the Audit of the Standalone financial Statements**

**1. Opinion**

- A. We have audited the accompanying Standalone Financial Statements of **Sarnimal Investments Limited** ("the Company"), which comprise the Balance Sheet as at March 31, 2022, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows for the year ended on that date, and a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the Standalone Financial Statements").
- B. In our opinion and to the best of our information and according to the explanations given to us, the aforesaid Standalone Financial Statements give the information required by the Companies Act, 2013 ("the Act") in the manner so required and give a true and fair view in conformity with the Indian Accounting Standards prescribed under section 133 of the Act read with the Companies (Indian Accounting Standards) Rules, 2015, as amended, ("Indi's") and other accounting principles generally accepted in India, of the state of affairs of the Company as at March 31, 2022, the profit and total comprehensive income, changes in equity and its cash flows for the year ended on that date.

**2. Basis for Opinion**

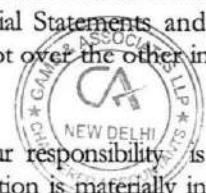
We conducted our audit of the Standalone Financial Statements in accordance with the Standards on Auditing specified under section 143(10) of the Act (SAs). Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Standalone Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India (ICAI) together with the independence requirements that are relevant to our audit of the financial statements under the provisions of the Act and the Rules made there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI's Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Standalone Financial Statements.

**3. Key Audit Matters**

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the Standalone Financial Statements of the current period. These matters were addressed in the context of our audit of the Standalone Financial Statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. We have determined that there are no matters to be described as key audit matters.

**4. Information Other than the Standalone Financial Statements and Auditor's Report Thereon**

- A. The Company's Board of Directors is responsible for the preparation of the other information. The other information comprises the information included in the Management Discussion and Analysis, Board's Report including Annexure to Board's Report, Corporate Governance and Shareholder's Information to the extent applicable, but does not include the Standalone Financial Statements and our auditor's report thereon. Our opinion on the standalone financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.
- B. In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Standalone Financial Statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is material misstatement of this other information; we are required to report that fact. We have nothing to report in this regard.



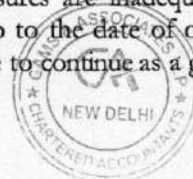
## 5. Management's Responsibility for the Standalone Financial Statements

- A. The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these Standalone Financial Statements that give a true and fair view of the financial position, financial performance, total comprehensive income, changes in equity and cash flows of the Company in accordance with the Indi's and other accounting principles generally accepted in India. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the standalone financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.
- B. In preparing the Standalone Financial Statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Company or to cease operations, or has no realistic alternative but to do so.

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

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

- A. Our objectives are to obtain reasonable assurance about whether the Standalone Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Standalone Financial Statements.
- B. As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:
- i) Identify and assess the risks of material misstatement of the standalone financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
  - ii) Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
  - iii) Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
  - iv) Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Standalone Financial 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.





- v) Evaluate the overall presentation, structure and content of the Standalone Financial Statements, including the disclosures, and whether the Standalone Financial Statements represent the underlying transactions and events in a manner that achieves fair presentation.
- C. Materiality is the magnitude of misstatements in the Standalone Financial Statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the Standalone Financial Statements maybe influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the Standalone Financial Statements.
- D. We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.
- E. We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.
- F. From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Standalone Financial Statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

## II. Report on Other Legal and Regulatory Requirements

1. As required by Section 143(3) of the Act, based on our audit we report that:
- A. We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit
- B. In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.
- C. The Balance Sheet, the Statement of Profit and Loss including Other Comprehensive Income, Statement of Changes in Equity and the Statement of Cash Flow dealt with by this Report are in agreement with the relevant books of account
- D. In our opinion, the aforesaid standalone financial statements comply with the India's 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, 2022 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2022 from being appointed as a director in terms of Section 164 (2) of the Act.
- F. With respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in "Annexure A". Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company's internal financial controls over financial reporting.
- G. With respect to the other matters to be included in the Auditor's Report in accordance with the requirements of section 197(16) of the Act, as amended:

In our opinion and to the best of our information and according to the explanations given to us, the remuneration paid by the Company to its directors during the year is in accordance with the provisions of section 197 of the Act



H. With respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules, 2014, as amended in our opinion and to the best of our information and according to the explanations given to us:

- i) The Company does not have any pending litigations which would impact its financial position.
- ii) The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
- iii) There were no amounts which were required to be transferred to the Investor Education and Protection Fund by the Company.
- iv)
  - a. The Management has represented that, to the best of its knowledge and belief, no funds (which are material either individually or in the aggregate) 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 or entity, including foreign entity ("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, no funds (which are material either individually or in aggregate) have been received by company from any person or entity, including foreign entity ("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 Ultimate Beneficiaries;
  - c. Based on the 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) During the year, company has not declared or paid dividend during the year which is in compliance with section 123 of the Companies Act, 2013.

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 to the extent applicable.

For: GAMS & Associates LLP  
Chartered Accountants  
FRN ON500094  
UDIN: 22088218AJXPXQ3502

*Anil Gupta*



CA Anil Gupta  
(Partner)  
M. No. 088218

Place: New Delhi  
Dated: 30/05/2022

**SARNIMAL INVESTMENTS LIMITED**

**ANNEXURE "A" TO THE INDEPENDENT AUDITORS REPORT**

(Referred to in 1(f) under 'Report on Other Legal and Regulatory Requirements' Section of our reports to the Members of Sarnimal Investments Limited of even date)

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

We have audited the internal Financial Controls over financial reporting of **SARNIMAL INVESTMENTS LIMITED** ("the Company") as at March 31, 2022 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

**Management's Responsibility for Internal Financial Controls**

The Company's Management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India (ICAI). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to the Company's policies, the safeguarding 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 Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the 'Guidance Note') and the Standards on Auditing, issued by the ICAI and deemed to be prescribed under Section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

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

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

**Meaning of Internal Financial Controls over Financial Reporting**

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that



(1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the Company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the Company are being made only in accordance with authorizations of the Management and directors of the Company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the Company's assets that could have a material effect on the financial statements.

#### **Inherent Limitations of Internal Financial Controls Over Financial Reporting**

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

#### **Opinion**

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31st March 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: GAMS & Associates LLP**  
**Chartered Accountants**  
**FRN ON500094**  
**UDIN: 22088218AJXPXQ3502**

*Anil Gupta*



**CA Anil Gupta**  
**(Partner)**  
**M. No. 088218**

**Place: New Delhi**  
**Dated: 30/05/2022**

**SARNIMAL INVESTMENTS LIMITED**  
**ANNEXURE "B" TO THE INDEPENDENT AUDITORS REPORT**

(Referred to in paragraph 2 under 'Report on Other Legal & Regulatory Requirements' section of our report to the Members of Sarnimal investments Limited of even date)

**Pursuant to Companies (Auditors Report) Order 2020**

To the best of our information and according to the explanations provided to us by the company and the books of accounts and records examined by us in the normal course of Audit, we state that:

- (i) (a) As explained to us, There are no property, Plant and Equipments and Intangible Assets in the Company. Hence, reporting under clause 3(i)(a) is not applicable.
- (b) As explained to us, There are no property, Plant and Equipments and Intangible Assets in the Company. Hence, reporting under clause 3(i)(b) is not applicable.
- (c) As explained to us, there is no immovable property held by the company.
- (d) The Company has not revalued any of its Property, plant and Equipments and Intangible assets during the year.
- (e) No proceedings have been initiated during the year or are pending against the company as at March 31<sup>st</sup>, 2022 for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (as amended in 2016) and rules made thereunder.
- (ii) (a) As explained to us, the company holds inventory of shares and those are in demat form so it is not possible to physically verify the inventory by the management.
- (b) The Company has not been sanctioned working capital limits in excess of Rs. 5 crores, in aggregate, at any points of time during the year, from banks or financial institutions on the basis of security of current assets and hence reporting under clause 3(ii)(b) of the Order is not applicable.
- (iii) The Company has granted loans, secured or unsecured to companies, firms, Limited Liability Partnership or other parties covered in the register maintained under section 189 of the Act. Accordingly the provisions of clause 3(iii) (a) to (c) of the Order are applicable to the Company.
1. The Terms and conditions of the grant of such loan are prima facie not prejudicial to the company's interest.
  2. The schedule of repayment of principal and payment of interest has been stipulated and the repayments and receipts are regular.
  3. In respect of the loans granted by the company, there is no overdue amount remaining outstanding as at the Balance sheet date.
  4. No loan granted by the company which has fallen due during the year has been renewed or extended or fresh loans granted to settle the overdues of existing loans given to same parties.
  5. The Company has not granted any loans or advances in the nature of loans either



repayable on demand or without specifying any terms or period of repayment during the year. Hence, reporting under clause 3(iii)(f) is not applicable.

- (iv) In our opinion and according to the information and explanations given to us, the company has complied with the provisions of section 185 and 186 of the Companies Act, 2013, in respect of loans, investments, guarantees, and security.
- (v) The company has not accepted any deposit or amounts which are deemed to be deposits and hence the directives issued by the Reserve Bank of India and the provisions of Section 73 to 76 or any other relevant provisions of the Act and the Companies (Acceptance of Deposit) Rules, 2015 with regard to the deposits accepted from the public are not applicable. Hence, reporting under 3(v) of the order is not applicable.
- (vi) As informed to us, the maintenance of cost records has not been specified by the Central Government under sub-section (1) of Section 148 of the Companies Act, in respect of the activities carried on by the company.
- (vii) (a) According to information and explanations given to us and on the basis of our examination of the books of account, and records, the Company has been generally regular in depositing undisputed statutory dues including provident fund, Employees State Insurance, Income-Tax, Sales Tax, Service Tax, Duty of Customs, Duty of Excise, Value Added Tax, Goods and Services Tax, Cess and any other statutory dues with the appropriate authorities. According to the information and explanations given to us, no undisputed amounts payable in respect of the above were in arrears as at March 31, 2022 for a period of more than six months from the date on when they become payable.
- (b) According to the information and explanations given to us, there are no dues of Income Tax, sales tax, service tax, duty of customs, duty of excise, value added tax outstanding on account of any dispute.
- (viii) There were no transactions relating to previously unrecorded income that have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act. 1961.
- (ix) a. The Company has not taken any loans or other borrowings from any lender. hence, reporting under clause 3(ix)(a) of the Order is not applicable.
- b. The Company has not been declared wilful defaulter by any bank or financial institution or government or government authority.
- c. The company has not taken any long term loan during the year and there are no outstanding term loans at the beginning of the year and hence, reporting under clause 3(ix)(c) of the Order is not applicable.
- d. On an overall examination of the financial statements of the company, no funds were raised for short term by the company. Hence reporting under this clause is not applicable.
- e. On an overall examination of the financial statements of the company, the Company has not taken any funds from the entity or person on account of or to meet the obligations of its subsidiaries.
- f. The company has not raised any loans during the year and hence reporting of the clause 3(ix)(f) is not applicable.



- (x) Based upon the audit procedures performed and the information and explanations given by the management, the Company has not raised money by way of initial public offer or further public offer including debt instruments and term loans. Also, Company has not made any preferential allotment or private placement of the shares or convertible debentures (fully or partly or optionally). Accordingly, the provisions of clause 3(x) of the order are not applicable to the company and hence not commented upon.
- (xi) Based upon the audit procedures performed and the information and explanations given by the management, we report that no fraud by the company or on the company by its officers or employees has been noticed or reported during the year. Also, there were no whistle blower complaints received by the company which could be considered while determining the Nature, Timing and Extent of the Audit procedures. hence, reporting under clause 3(xi) is not applicable.
- (xii) In our opinion, the company is not a Nidhi Company. Therefore, the provisions of clause 3(xii) of the order are not applicable to the Company.
- (xiii) In our opinion, all transactions with the related parties are in compliance with section 177 and 188 of the Companies Act, 2013 and the details have been disclosed in the Financial Statements as required by the applicable accounting standards.
- (xiv) a. In our opinion the company has an adequate internal audit system commensurate with the size and the nature of its business.
- b. We have considered, the internal audit reports for the year under audit, issued to the company during the year and till date, in determining the nature, timing and extent of our audit procedures.
- (xv) Based upon the audit procedures performed and the information and explanations given by the management, the Company has not entered into any non-cash transactions with directors or persons connected with them. Accordingly, the provisions of clause 3 (xv) of the Order are not applicable to the Company and hence not commented upon.
- (xvi) (a) The Company is registered under section 45-IA of the Reserve Bank of India Act, 1934.
- (b) The company has not conducted any Non-banking Financial or Housing Finance activities without a valid Certificate of Registration (CoR) from Reserve bank of India Act, 1934;
- (c) The Company is not a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India.
- (d) There are no CIC as a part of the group.
- (xvii) The company has not incurred Cash losses during the financial year covered by our audit and the immediately preceding financial year.
- (xviii) There has been no resignation of the statutory auditors of the company during the financial year.
- (xix) On the basis of financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements and 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 reports indicating 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 future viability of the company. We further state that our reporting is based on the facts upto 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 they fall due.

(xx) The CSR requirements are not applicable on the company. Hence, reporting under clause 3(xx) is not applicable.

**For: GAMS & Associates LLP**  
**Chartered Accountants**  
**FRN ON500094**  
**UDIN: 22088218AJXPXQ3502**

*Anil Gupta*



**CA Anil Gupta**  
**(Partner)**  
**M. No. 088218**

**Place: New Delhi**  
**Dated: 30/05/2022**