

NEWEVER TRADE WINGS LTD

CIN: L74999WB2012PLC181106

238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR,

KOLKATA - 700020, WEST BENGAL, INDIA

Email: newevertradewingsltd@gmail.com

NOTICE IS HEREBY GIVEN THAT THE 13TH ANNUAL GENERAL MEETING OF THE MEMBERS OF NEWEVER TARDE WINGS LIMITED WILL BE HELD ON, MONDAY, SEPTEMBER 29, 2025 AT 04:00 P.M. AT BHARTIYA BHASHA PARDHAD 36A, SHAKESPEARE SARANI, KOLKATA-700017, WEST BENGAL, INDIA:

ORDINARY BUSINESS:

1. To consider and adopt the audited financial statement of the Company for the financial year ended March 31, 2025 and the reports of the Board of Directors and Auditors thereon:

In this regard, to consider and if thought fit, to pass, with or without modification(s), the following resolutions as **Ordinary Resolutions**:

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

2. To appoint Mr. Vikrant Kayan (DIN: 00761044), who retires by rotation as a Director:

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

“**RESOLVED THAT** in accordance with the provisions of Section 152 and other applicable provisions of the Companies Act, 2013, Mr. Vikrant Kayan (DIN: 00761044), who retires by rotation at this meeting be and is hereby appointed as a Director of the Company.”

SPECIAL BUSINESS:

3. To Appointment of M/s. Suprabhat & Co, a peer reviewed firm of practicing Company Secretaries, as Secretarial Auditor of the Company::

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

“**RESOLVED THAT** pursuant to the provisions of Section 204 and other applicable provisions, if any, of the Companies Act, 2013 (hereinafter referred to as the “Act”), read with Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 (including any statutory modification or reenactment thereof for the

time being in force) and Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") and such other applicable provisions if any, and on the recommendation of Audit Committee and Board of Directors of the company, M/s. Suprabhat & Co., a peer reviewed firm of Practicing Company Secretaries, being eligible, be and is hereby appointed as Secretarial Auditor of the Company for a term of Three (3) consecutive financial years commencing from the conclusion of the ensuing 13th Annual General Meeting till the conclusion of 16th Annual General Meeting to be held in the year 2028 (i.e. to conduct the Secretarial Audit for 3 financial year from 2025-26 to 2027-28), on such remuneration as recommended by the Audit Committee and as may be mutually agreed between the Board of Directors of the Company and Secretarial Auditors from time to time.

"RESOLVED FURTHER THAT the Board be and is hereby authorized to delegate all or any of the powers to any committee of directors with power to further delegate to any other officer(s) / authorized representative(s) of the Company to do all acts, deeds and things and take all such steps as may be necessary, proper or expedient to give effect to this resolution."

**By Order of the Board of
Directors
NEWEVER TRADE WINGS LTD
Sd/-
Vikrant Kayan
Director
DIN: 00761044**

**Date: 28.08.2025
Place: Kolkata**

NOTES:

1. Explanatory Statement in respect of special business to be transacted pursuant to Section 102 of the Companies Act, 2013 and/or Regulation 36(3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with respect to **Item Nos. 3** is annexed hereto.
2. The relevant details, pursuant to Regulations 26(4) and 36(3) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations") and Secretarial Standard on General Meetings issued by the Institute of Company Secretaries of India, in respect of Director retires by rotation and seeking appointment/reappointment at this Annual General Meeting ("AGM") are annexed to the notice.
3. A member entitled to attend and vote at the meeting is entitled to appoint a proxy to attend and vote instead of himself / herself at the venue of the meeting and such proxy need not be a member of the company. The proxies to

be effective should be deposited at the registered office of the Company not less than forty-eight (48) hours before the commencement of the meeting and in default, the instrument of proxy shall be treated as invalid. Proxies submitted on behalf of the companies, societies etc., must be supported by an appropriate resolution / authority, as applicable. A person can act as a proxy on behalf of members not exceeding 50 and holding in aggregate not more than 10% of the total share capital of the Company carrying voting rights. Accordingly, the facility for appointment of proxies by the Members will be available for the AGM and hence the Proxy Form and Attendance Slip are annexed to this Notice.

4. In the case of Corporate Member, it is requested to send a scanned copy of the Board Resolution/Authorization authorizing the representative to attend the AGM physically and vote on its behalf at the meeting. The said Resolution / Authorization shall be sent to the Company Secretary by email through its registered email address to newevertradewingsltd@gmail.com.
5. In compliance with the provisions of Section 108 of the Act, read with Rule 20 of the Companies (Management and Administration) Rules, 2014, as amended from time to time, and Regulation 44 of the LODR Regulations, the Company has extended remote e-voting facility for its members to enable them to cast their votes electronically on the resolutions set forth in this notice. The instructions for remote e-voting are provided in this notice. The remote e-voting commences on **Friday 26th September 2025 at 9.00 a.m. to Sunday 28th September, 2025 at 5.00 p.m. (IST)**. The voting rights of the Shareholders shall be in proportion to their shares of the paid-up equity share capital of the Company as on the **cut-off date, i.e., Monday 22nd September, 2025**.
6. Any person who is not a member post cut-off date should be treated this notice for information purposes only.
7. Polling Paper, Proxy Form and Attendance Slip are the part of this notice.
8. A person, whose name is recorded in the Register of Members or in the Register of Beneficial Owners maintained by the depositories as on the cut-off date only shall be entitled to avail the facility of remote e-voting as well as voting (by poll) at the AGM.
9. Any person, who acquires shares and becomes a Member of the Company after sending the notice and holding shares as of the **cut-off date, i.e., Monday 22nd September, 2025** may obtain the login ID and password by sending a request to the Registrar and Share Transfer Agent (RTA) Adroit Corporate Services Pvt. Ltd. at info@adroitcorporate.com or e-voting provider Purva Shareregistry (India) Private Limited at evoting@purvashare.com for casting the vote.
10. Appointed Suprabhat Chakraborty (Membership No. A41030 AND COP. 15878), Practicing Company Secretary as a Scrutinizer to scrutinize e-voting and submit their report as prescribed under Companies Act, 2013, vide Board Resolution dated 28th August, 2025 has been appointed as the Scrutinizer to scrutinize the voting and remote e-voting process in a fair and transparent manner.

11. The Scrutinizer shall within a period not exceeding 2 (Two) working days from the conclusion of the e-voting period unblock the votes in the presence of at least 2 (Two) witnesses not in the employment of the Company and make a Scrutinizer's report of the votes cast in favor or against, if any, forthwith to the Chairman of the Company or a person authorized by him in writing.
12. The Results shall be declared after the AGM of the Company. The Results declared along with the Scrutinizer's Report shall be placed on the Company's website viz www.newetradewings.com and on the website of RTA within 2 (Two) working days of passing of the resolutions at the AGM of the Company and the same will also be communicated to the Stock Exchanges.
13. To support the 'Green Initiative', Members who have not yet registered their email addresses are requested to register the same with their Depository Participants (DPs) or Adroit Corporate Services Pvt. Ltd ("RTA") in case the shares are held by them in electronic form and with RTA in case the shares are held by them in physical form.
14. Members are requested to intimate changes, if any, pertaining to their name, postal address, email address, telephone/ mobile numbers, Permanent Account Number (PAN), mandates, nominations, power of attorney, bank details such as, name of the bank and branch details, bank account number, MICR code, IFSC code, etc., to their Depository Participants.
15. In compliance with the aforesaid MCA Circulars and SEBI Circular, Notice of the AGM along with the Annual Report 2024-25 is being sent only through electronic mode to those Members whose email addresses are registered with the Company/ RTA/ Depositories. Members may note that the Notice and Annual Report 2024-25 will also be available on the Company's website www.newetradewings.com, since the company is a delist from the stock exchange the Annual Report of the Company send to the Stock Exchange i.e. BSE Limited at www.bseindia.com by mail. The Company will also be publishing an advertisement in newspaper containing the details about the AGM, date and time of AGM, availability of notice of AGM at the Company's website, manner of registering the email IDs of those shareholders who have not registered their email addresses with the Company/ RTA and other matters as may be required.
16. Members attending the AGM shall be counted for the purpose of reckoning the quorum under Section 103 of the Act.
17. In case of joint holders, only one of the members whose name appears the Register of Members of the Company will be entitled to vote in respect of the resolutions proposed at the AGM.
18. The Members who have cast their vote by remote e-voting prior to the AGM may also attend/ participate in the AGM but shall not be entitled to cast their vote again.
19. Pursuant to Section 91 of the Act, the Register of Members of the Company will

remain closed from Tuesday 23rd September, 2025 to Monday 29th September, 2025 (both the days inclusive).

20. The Registers maintained under Section 170 & 189 of the Act, and the relevant documents referred to in the Notice will be available electronically for inspection till the conclusion of AGM by the members based on the request being sent on the registered mail id of the company.
21. Member(s) must quote their Folio Number/ DP ID & Client ID and contact details such as email address, contact no. etc. in all correspondences with the Company/ RTA.
22. As per Regulation 40 of LODR Regulations, as amended, securities of listed companies can be transferred only in dematerialized form with effect from April 1, 2019, except in case of request received for transmission or transposition of securities. In view of this and to eliminate all risks associated with physical shares and for ease of portfolio management, members holding shares in physical form are requested to consider converting their holdings to dematerialized form. Members can contact the RTA for assistance in this regard.
23. In case of joint holders, the Member whose name appears as the first holder in the order of names as per the Register of Members of the Company will be entitled to vote at the AGM.
24. Pursuant to the provisions of Section 72 of the Act the Member(s) holding shares in physical form may nominate, in the prescribed manner, any person to whom all the rights in the shares shall vest in the event of death of the sole holder or all the joint holders. A nomination form for this purpose is available with the Company or its RTA. Member(s) holding shares in demat form may contact their respective DPs for availing this facility.
25. Member(s) holding shares in physical form is/ are requested to notify immediately any change of their respective addresses and bank account details. Please note that request for change of address, if found incomplete in any respect shall be rejected. Members holding shares in demat form are requested to notify any change in their addresses, e-mails and/or bank account mandates to their respective DPs only and not to the Company/ RTA for effecting such changes. The Company uses addresses, e-mails and bank account mandates furnished by the Depositories for updating its records of the Shareholders holding shares in electronic/demat form.

THE INSTRUCTIONS FOR MEMBERS FOR REMOTE E-VOTING:

THE INTRUCTIONS OF SHAREHOLDERS FOR REMOTE E-VOTING:

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

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

- (i) The voting period begins on **Friday 26th September 2025 at 9.00 a.m. to Sunday 28th September, 2025 at 5.00 p.m. (IST)**. During this period shareholders' of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date (record date) of **Monday 22nd September, 2025** may cast their vote electronically. The e-voting module shall be disabled by PURVA for voting thereafter.
- (ii) Shareholders who have already voted prior to the meeting date would not be entitled to vote at the meeting venue.
- (iii) Currently, there are multiple e-voting service providers (ESPs) providing e-voting facility to listed entities in India. This necessitates registration on various ESPs and maintenance of multiple user IDs and passwords by the shareholders.

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

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

Login method for e-Voting **for Individual shareholders holding securities in Demat mode CDSL/NSDL** is given below:

Type of shareholders	Login Method
Individual Shareholders	1) Users who have opted for CDSL Easi / Easiest facility, can login through their existing user id and password. Option will be made available to reach e-Voting page without any further authentication. The users to login to Easi / Easiest are requested to visit cdsl website www.cdslindia.com and click on login icon &

holding securities in Demat mode with CDSL Depository	New System Myeasi Tab. 2) After successful login the Easi / Easiest user will be able to see the e-Voting option for eligible companies where the evoting is in progress as per the information provided by company. On clicking the evoting option, the user will be able to see e-Voting page of the e-Voting service provider for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting. Additionally, there is also links provided to access the system of all e-Voting Service Providers, so that the user can visit the e-Voting service providers' website directly. 3) If the user is not registered for Easi/Easiest, option to register is available at cdsi website www.cdslindia.com and click on login & New System Myeasi Tab and then click on registration option. 4) Alternatively, the user can directly access e-Voting page by providing Demat Account Number and PAN No. from a e-Voting link available on www.cdslindia.com home page. The system will authenticate the user by sending OTP on registered Mobile & Email as recorded in the Demat Account. After successful authentication, user will be able to see the e-Voting option where the evoting is in progress and also able to directly access the system of all e-Voting Service Providers.
Individual Shareholders holding securities in demat mode with NSDL Depository	1) If you are already registered for NSDL IDeAS facility, please visit the e-Services website of NSDL. Open web browser by typing the following URL: https://eservices.nsdl.com either on a Personal Computer or on a mobile. Once the home page of e-Services is launched, click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section. A new screen will open. You will have to enter your User ID and Password. After successful authentication, you will be able to see e-Voting services. Click on "Access to e-Voting" under e-Voting services and you will be able to see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period. 2) If the user is not registered for IDeAS e-Services, option to register is available at https://eservices.nsdl.com. Select "Register Online for IDeAS "Portal or click at https://eservices.nsdl.com/SecureWeb/IdeasDirectReg.jsp 3) Visit the e-Voting website of NSDL. Open web browser by typing the following URL: https://www.evoting.nsdl.com/ either on a Personal Computer or on a mobile. Once the home page of e-

	Voting system is launched, click on the icon “Login” which is available under ‘Shareholder/Member’ section. A new screen will open. You will have to enter your User ID (i.e. your sixteen digit demat account number hold with NSDL), Password/OTP and a Verification Code as shown on the screen. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period. 4) Shareholders/Members can also download NSDL Mobile App “NSDL Speede” facility by scanning the QR code mentioned below for seamless voting experience. 5) For OTP based login you can click on https://eservices.nsdl.com/SecureWeb/evoting/evotinglogin.jsp. You will have to enter your 8-digit DP ID, 8-digit Client Id, PAN No., Verification code and generate OTP. Enter the OTP received on registered email id/mobile number and click on login. After successful authentication, you will be redirected to NSDL Depository site wherein you can see e-Voting page. Click on company name or e-Voting service provider name and you will be re-directed to e-Voting service provider website for casting your vote during the remote e-Voting period or joining virtual meeting & voting during the meeting.
Individual Shareholders (holding securities in demat mode) login through their Depository Participant	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. After Successful login, you will be able to see e-Voting option. Once you click on e-Voting option, you will be redirected to NSDL/CDSL Depository site after successful authentication, wherein you can see e-Voting feature. Click on company name or e-Voting service provider name and you will be redirected to e-Voting service provider website for casting your vote during the remote e-Voting period.

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

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

Login type	Helpdesk details
Individual Shareholders holding securities in Demat mode with CDSL	Members facing any technical issue in login can contact CDSL helpdesk by sending a request at helpdesk.evoting@cdslindia.com or contact at toll free no. 1800 22 55 33
Individual Shareholders holding securities in Demat mode with NSDL	Members facing any technical issue in login can contact NSDL helpdesk by sending a request at evoting@nsdl.com or call at : 022 - 4886 7000 and 022 - 2499 7000

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

Login method for e-Voting and joining virtual meeting for **shareholders other than individual shareholders holding in Demat form & physical shareholders.**

- 1) The shareholders should log on to the e-voting website <https://evoting.purvashare.com>.
- 2) Click on “Shareholder/Member” module.
- 3) Now enter your User ID
 - a. For CDSL: 16 digits beneficiary ID,
 - b. For NSDL: 8 Character DP ID followed by 8 Digits Client ID,
 - c. Shareholders holding shares in Physical Form should enter EVENT Number followed by Folio Number registered with the company. For example if folio number is 001*** and EVENT is 8 then user ID is 8001***

4) If you are holding shares in demat form and had logged on to www.evotingindia.com or www.evoting.nsdl.com and voted on an earlier e-voting of any company, then your existing password is to be used.

5) If you are a first-time user follow the steps given below:

	For Shareholders holding shares in Demat Form other than individual and Physical Form
PAN	Enter your 10 digit alpha-numeric *PAN issued by Income Tax Department (Applicable for both demat shareholders as well as physical shareholders) Shareholders who have not updated their PAN with the Company/Depository Participant are requested to use the sequence number sent by Company/RTA or contact Company/RTA.
Dividend Bank Details OR Date of Birth (DOB)	Enter the Dividend Bank Details or Date of Birth (in dd/mm/yyyy format) as recorded in your demat account or in the company records in order to login. If both the details are not recorded with the depository or company, please enter the member id / folio number in the Dividend Bank details field as mentioned in instruction (v).

- (i) After entering these details appropriately, click on “SUBMIT” tab.
- (ii) Shareholders holding shares in physical form will then directly reach the Company selection screen.
- (iii) For shareholders holding shares in physical form, the details can be used only for e-voting on the resolutions contained in this Notice.
- (iv) Click on the EVENT NO. for the relevant Newever Trade Wings Ltd on which you choose to vote.

- (v) On the voting page, you will see “RESOLUTION DESCRIPTION” and against the same the option “YES/NO/ABSTAIN” for voting. Select the option YES or NO or ABSTAIN as desired. The option YES implies that you assent to the Resolution, option NO implies that you dissent to the Resolution and option ABSTAIN implies that you are not voting either for or against the Resolution.
- (vi) Click on the “NOTICE FILE LINK” if you wish to view the Notice.
- (vii) After selecting the resolution, you have decided to vote on, click on “SUBMIT”. A confirmation box will be displayed. If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote.
- (viii) Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.
- (ix) **Facility for Non – Individual Shareholders and Custodians – Remote Voting**
- Non-Individual shareholders (i.e. other than Individuals, HUF, NRI etc.) and Custodians are required to log on to <https://evoting.purvashare.com> and register themselves in the “Custodians / Mutual Fund” module.
 - A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to evoting@purvashare.com.
 - After receiving the login details a Compliance User should be created using the admin login and password. The Compliance User would be able to link the account(s) for which they wish to vote on.
 - A scanned copy of the Board Resolution and Power of Attorney (POA) which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the scrutinizer to verify the same.
 - Alternatively, Non Individual shareholders are required to send the relevant Board Resolution/ Authority letter etc. together with attested specimen signature of the duly authorized signatory who are authorized to vote, to the Scrutinizer and to the Company at the email address viz; newevertradewingsltd@gmail.com, if they have voted from individual tab & not uploaded same in the Purva e-voting system for the scrutinizer to verify the same.

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

1. For Physical shareholders- please provide necessary details like Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self-attested scanned copy of PAN card), AADHAR (self-attested scanned copy of Aadhar Card) by email to **Company email i.e** newevertradewingsltd@gmail.com **or RTA email id i.e** info@adroitcorporate.com.

1. For Demat shareholders -, Please update your email id & mobile no. with your respective Depository Participant (DP).
2. For Individual Demat shareholders – Please update your email id & mobile no. with your respective Depository Participant (DP) which is mandatory while e-Voting & joining virtual meetings through Depository.

If you have any queries or issues regarding attending AGM & e-Voting from the Purva e-Voting System, you can write an email to evoting@purvashare.com or contact at 022-49614132 and 022-35220056.

All grievances connected with the facility for voting by electronic means may be addressed to Ms. Deepali Dhuri, Compliance Officer, Purva Shareregistry (India) Private Limited, Unit No. 9, Shiv Shakti Industrial Estate, J. R. Boricha Marg, Lower Parel (East), Mumbai - 400011 or send an email to evoting@purvashare.com or contact at 022- 022-49614132 and 022-35220056.

Date: 28.08.2025
Place: Kolkata

**By Order of the Board of
Directors
NEWEVER TRADE WINGS LTD
Sd/-
Vikrant Kayan
Director
DIN: 00761044**

EXPLANATORY STATEMENT IN RESPECT OF THE SPECIAL BUSINESS PURSUANT TO SECTION 102 OF THE ACT AND REGULATION 36 OF THE SEBI LISTING REGULATIONS AND SECRETARIAL STANDARD- 2 ON GENERAL MEETINGS AND FOLLOWING STATEMENT SETS OUT ALL MATERIAL FACTS RELATING TO ITEM NO. 3 MENTIONED IN THE ACCOMPANYING NOTICE:

ITEM NO. 3: APPOINTMENT OF M/S SUPRABHAT & CO., COMPANY SECRETARY (MEMBERSHIP NO.: A41030 CP NO. 15878 AS A SECRETARIAL AUDITOR OF THE COMPANY FOR A PERIOD OF 3 (THREE) YEARS AND FIXED REMUNERATION

SEBI vide its notification dated December 12, 2024, amended the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"). As per the amended regulations, listed companies are now required to obtain shareholders' approval, in addition to Board approval, for the appointment of Secretarial Auditors. The appointed Secretarial Auditor must be a peer-reviewed practicing Company Secretary and must not have any disqualifications as prescribed by the SEBI. Additionally, any association of the individual or firm as the Secretarial Auditor of the listed entity prior to March 31, 2025, shall not be considered for the purpose of calculating the tenure under the said Regulation.

Pursuant to the above requirement, the Board at its meeting held on 28th August 2025, considering the experience and expertise and based on the recommendation of the Audit Committee, has proposed to the Members of the Company the appointment of M/s. Suprabhat & Co, Company Secretaries a peer reviewed firm, as Secretarial Auditor of the Company for a period of Three (3) consecutive financial years, i.e. from financial year 2025-26 to financial year 2027-28 in terms of Regulation 24A of the SEBI Listing Regulations and SEBI Circular No. SEBI/ HO/CFD/CFD-PoD2/CIR/P/ 2024/185 dated December 31, 2024 ("SEBI Circular") read with provisions of Section 204 of the Companies Act, 2013 and Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

Brief Profile

ACS Suprabhat Chakraborty (Membership No. ACS 41030, CP No. 15878) is the proprietor of M/s. Suprabhat & Co and a Practicing Company Secretary with over 10 years of experience in the field.

In addition to filing various statutory returns under the Companies Act, he possesses extensive expertise in the incorporation of foreign companies, private company, producer company, Limited Liabilities Company and Section 8 Companies. He also has significant experience representing clients in petitions before the Regional Director (RD), the National Company Law Tribunal (NCLT) and the Ministry of Corporate Affairs (MCA) on a range of company law matters.

Mr. Chakraborty is well-versed in the legal frameworks related to Company Law, SEBI, and more. He has practical experience in share transfer and transmission MCA based filings of annual returns, particularly for large.

Details as per Regulation 36(5) of the SEBI Listing Regulations are as follows.

Proposed fees payable to the Secretarial Auditor along with terms of appointment	The Professional audit and other certification fees plus applicable taxes and other out-of-pocket expenses in connection with the statutory audit for Financial Year ending March 31, 2026 and for subsequent year(s) of their term, such fee as determined by the Board, on recommendation of Audit Committee.
Basis of recommendation for appointment including the details in relation to and credentials of the Secretarial Auditor	Considering their qualifications and_ extensive experience, the Board of directors on recommendation of the Audit Committee recommends the appointment of M/s. Suprabhat & Co, Practicing Company Secretaries as the Secretarial Auditors of the Company for a period of Three (3) consecutive financial years, i.e. from financial year 2025-26 to financial year 2027-28.

The appointment is subject to shareholders' approval at the Annual General Meeting. Accordingly, the approval of the Members is being sought for this proposed appointment.

None of the Directors, Key Managerial Personnel, or their respective relatives have any financial or other interest in the proposed resolution.

The Board seeks for the approval of the members for passing of the resolution as set out at item no. 08 of this Notice as an Ordinary Resolution.

**By Order of the Board of
Directors
NEWEVER TRADE WINGS LTD
Sd/-
Vikrant Kayan
Director
DIN: 00761044**

**Date: 28.08.2025
Place: Kolkata**

PROXY FORM
13TH ANNUAL GENERAL MEETING (2024-25)
[Pursuant to this Section 105(6) of the Companies
Act, 2013 and rule 19(3) of the Companies
(Management and Administration) Rules, 2014]

Name of the Company: NEWEVER TRADE WINGS LTD
(CIN: L74999WB2012PLC181106)

Registered office: 238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR, KOLKATA -
700020, WEST BENGAL, INDIA

Tel. No- +91 9831005644, E-Mail: newevertradewingsltd@gmail.com
Website: www.newetradewings.com

Name of the Member (s):

Registered Address:

Email-Id: _____

Folio No/Client ID:

DP ID:

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

1. Name:

Address:

E-mail Id:

Signature: _____, or failing him / her

2. Name:

Address:

E-mail Id:

Signature: _____, or failing him / her

3. Name:

Address:

E-mail Id:

Signature: _____, or failing him / her

as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the
13th Annual General Meeting of Newever Trade Wings Limited to be held on
Monday, 29th September, 2025 at 04:00 P.M. at Bhartiya Bhasha Pardhad, 36A,

Shakespeare Sarani, Kolkata-700017, WEST BENGAL, INDIA and at any adjournment thereof in respect of such resolutions as are indicated below:

Sr. No.	Resolutions	For	Against	Abstain
Ordinary Business				
1)	Adoption of Financial Statements for the Financial Year ended March 31, 2025:			
2)	To appoint a Director in place of Mr. Vikrant Kayan (DIN: 00761044) as a Director who retires by rotation and, being eligible to offers himself for re-appointment			
Special Business				
4)	To appoint Mr. Suprabhat Chakraborty from M/s Suprabhat & Co (Membership No. A41030 and COP. 15878), Practicing Company Secretary as Secretarial Auditor of the Company for Term of Three years.			

Signed this _____ day of _____ 2025

Affix
Revenue
Stamp

Signature of shareholder: _____

Signature of Proxy holder(s): _____

Notes:

1. This form of proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than **48 hours before** the commencement of the Meeting.
2. Please complete all details including details of member(s) before submission.

**FORM NO.MGT-12
POLLING PAPER**

**[Pursuant to section 109 (5) of the Companies Act, 2013 and Rule 21 (1) (c) of the Companies
(Management and Administration) Rules, 2014]**

Name of the Company: NEWEVER TRADE WINGS LTD
CIN: L74999WB2012PLC181106
Registered Office:- 238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR,
KOLKATA - 700020, WEST BENGAL, INDIA

Website: www.newetradewings.com
Email: newevertradewingsltd@gmail.com

BALLOT PAPER

Sr. No.	Particulars	Details
1	Name of the First-named Shareholder (In BLOCK letters)	
2	Postal address	
3	Registered Folio No./ *DP ID and Client ID No. (*Applicable to investors holding shares in dematerialized form)	

I hereby exercise my vote in respect of Ordinary/ Special Resolution/s enumerated below by recording my assent or dissent to the said Resolution in the following manner:

Sr. No.	Resolutions	No. of shares held by me	I assent to the Resolution	I dissent from the Resolution
ORDINARY BUSINESS: -				
1	To consider and adopt the Audited Financial Statement for the financial year ended 31st March, 2025:			
2	To appoint a Director in place of Mr. Vikrant Kayan (DIN: 00761044) as a Director who retires by rotation and, being eligible to offers himself for re-appointment.			
SPECIAL BUSINESS: -				
3	To appoint Mr. Suprabhat Chakraborty from M/s Suprabhat & Co (Membership No. A41030 and COP. 15878), Practicing Company Secretary as Secretarial Auditor of the Company for Term of Three years.			

Place : Kolkata
Date : 16.09.2025

(Signature of the shareholder)

ATTENDANCE SLIP
13TH ANNUAL GENERAL MEETING (2024-25)

I hereby record my presence at the 13th Annual General Meeting of the Company to be held on Monday on 29th September, 2025 at 04:00 P.M. at Bhartiya Bhasha Pardhad, 36A, Shakespeare Sarani, Kolkata-700017, West Bengal, India.

Name of the Member:_____

Folio/Client ID No.:_____

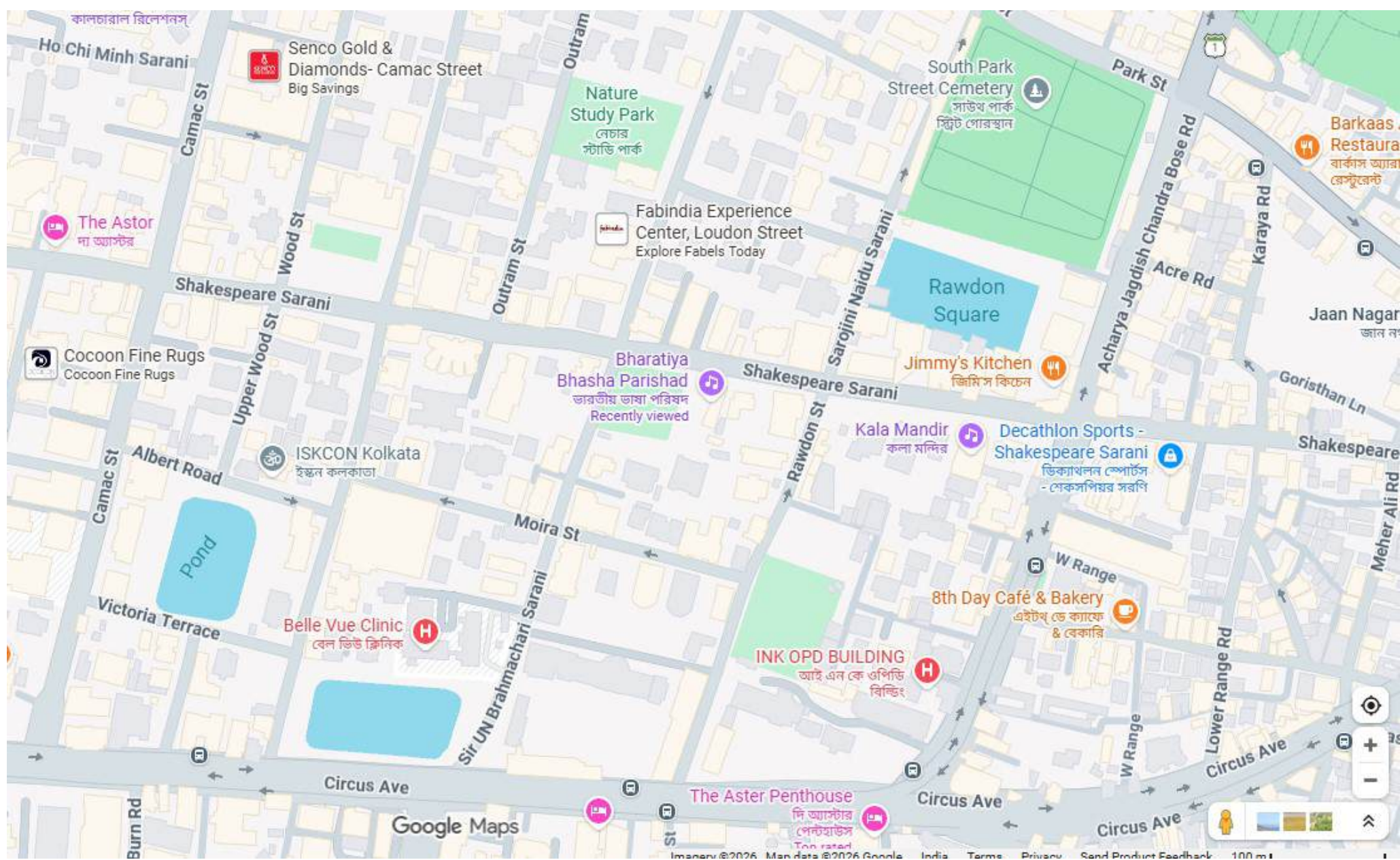
Name of the Proxy/ Representative (in Block Letters)
(To be fill in if the Proxy/Representative attends
Instead of the Member)_____

I certify that I am a member / proxy / authorized representative for the member of the Company.

Signature of the Member or Proxy/Representative:_____

Note:

- 1) Members are requested to bring their copies of the Annual Report to the meeting, since further copies will not be available.
- 2) The Proxy, to be effective should be deposited at the Registered Office of the Company not less than **FORTY-EIGHT HOURS (48 Hrs.)** before the commencement of the meeting.
- 3) A Proxy need not be a member of the Company.
- 4) In the case of joint holders, the vote of the senior who tenders a vote, whether in person or by Proxy, shall be accepted to the exclusion of the vote of the other joint holders. Seniority shall be determined by the order in which the names stand in the Register of Members.
- 5) The submission by a member of this form of proxy will not preclude such member from attending in person and voting at the meeting.



DIRECTOR'S REPORT

To
The Members,
NEWEVER TRADE WINGS LIMITED

Your Board of Directors takes pleasure in presenting this 13th Annual Report covering the highlights of the finances, business, and operations of your Company along with the Audited Financial Statements and Report of Auditors thereon for the Financial Year ended 31st March, 2025.

1. COMPANY'S FINANCIAL HIGHLIGHTS:

The highlights of the Company's financial results for the Financial Year 2024-2025 are as under:

(Amount in Rs)

Particulars	FY 2024-2025	FY 2023-2024
Total Income	2,48,711.00	3,42,660.00
Total Expenditure	8,90,472.00	5,97,777.00
Profit/loss before exceptional and extraordinary items and tax	(6,41,761.00)	(2,55,117.00)
Add: Exceptional Items	0.00	0.00
Profit Before Tax	(6,41,761.00)	(2,55,117.00)
Tax	20,229.00	23,801.00
Net Profit / (Loss) after Tax	(6,61,990.00)	(2,78,918.00)

2. OPERATIONS

During the financial total income from the business of the Company of Rs. 2,48,711.00. Total expenditure of the company is Rs. 8,90,472.00 as compared to Rs. 5,97,777.00 in the previous year. Loss during the financial year is Rs. 6,61,990.00 as compared to loss is Rs. 2,78,918.00 in the previous year.

3. DIVIDEND

Due to inadequate profits your directors do not recommend any dividend during the year under review.

4. AMOUNT TRANSFERRED TO RESERVE

Due to loss in the current year the company has not transfer any sum to reserve.

5. DEPOSITS

The company has not accepted any public deposits under the provisions of the Companies Act, 2013 ('Act').

6. SHARE CAPITAL

As on 31st March 2025, Authorised Capital of the Company stood Rs. 25,00,00,000.00 Consisting of 2,50,00,000 equity shares of face value of Rs.10 each, paid-up share capital of the company stood at Rs. 23,94,52,000.00 Consisting of 2,39,45,200 equity shares of face value of Rs.10.00 each fully paid-up.

7. SUBSIDIARIES / JOINT VENTURE / ASSOCIATE COMPANY

Your company does not have any Subsidiary/ Joint Venture and Associate Companies.

8. SECRETARIAL STANDARDS OF ICSI

The Company has complied with the requirements prescribed under the Secretarial Standards on Meetings of the Board of Directors (SS-1) and General Meetings (SS-2).

9. STATE OF AFFAIRS OF THE COMPANY

Granting of loans and advances and making investments is the core area of operations of the company. The Board of Directors of your company carries out these operations with active care and all essentials precaution thereby enhancing stakeholder's values.

10. CHANGE IN THE NATURE OF BUSINESS, IF ANY

There was no change in the nature of business of the company during the year.

11. MATERIAL CHANGES AND COMMITMENT, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY

The Share of the company delist by the BSE Ltd and imposed SOP and other penalties, Company filed petition to Securities Appellate Tribunal (SAT) for revocation of delist.

12. CORPORATE SOCIAL RESPONSIBILITY

The provisions of section 135 of the Companies Act, 2013 are not applicable to the company.

13. DIRECTORS AND KEY MANAGERIAL PERSONNEL

Appointments & Cessation of Directors

During the year under review there was no changes in the Board of Directors of the Company.

14. BOARD EVALUATION

The Board has carried out an annual performance evaluation of its own, the Independent Directors, Committee and other Individual Directors.

15. POLICY ON DIRECTOR'S APPOINTMENT AND REMUNERATION

The current policy is to have an appropriate mix of executive, non-executive and independent directors to maintain the independence of the board and separate its functions of governance and management. The remuneration paid to directors if any is recommended by the Nomination and Remuneration Committee and approved by Board of Directors and Shareholders of the Company. The remuneration is decided after considering various factors such as qualification, experience, performance, responsibilities shouldered, industry standards as well as financial position of the Company. The policy of the company on director's appointment and remunerations available on the website of the company i.e www.newetradewings.com.

16. COMMITTEES OF THE BOARD

The company has the following three committees of the board:

- (i) Audit Committee
- (ii) Nomination and Remuneration Committee
- (iii) Stakeholders Relationship Committee

The composition of each of the above committees, their respective role and responsibility is in conformity with the provisions of the Companies Act, 2013 and SEBI (LODR) Regulations, 2015 and amendments made therein from time to time.

17. MEETING OF BOARD OF DIRECTORS

During the year under review, 4 (Four) Board Meetings were held on 24.05.2024, 08.08.2024, 13.11.2024 and 10.02.2025. The details of number of meeting attended by each directors are as follows:

Date of Meeting	Mr. Vikrant Kayan	Mr. Vikash Dubey	Mr. Debjit Banerjee	Mr. Bhaskar Pal	Mrs. Girija Banerjee
	Attendance at the Board Meeting				
24.05.2024	Yes	Yes	Yes	Yes	Yes
08.08.2024	Yes	Yes	Yes	Yes	No
13.11.2024	Yes	Yes	Yes	Yes	No
10.02.2025	Yes	Yes	Yes	Yes	No

18. AUDIT COMMITTEE

The Composition of the Audit committee is in accordance with the requirements of section 177 of the Companies Act 2013 and comprises of Mr. Vikash Dubey as Chairman, Mr. Bhaskar Paul and Mr. Debjit Banerjee as its members.

During the Financial Year 2024-25, 4 (four) meetings of the Audit Committee of the Board of Directors were held on 24.05.2024, 08.08.2024, 13.11.2024 and 10.02.2025. All the recommendations made by the Audit Committee were accepted by the Board.

19. NOMINATION AND REMUNERATION COMMITTEE:

The Composition of the Nomination and Remuneration Committee is in accordance with the requirements of section 178 of the Companies Act 2013, and comprises of Mr. Vikash Dubey as Chairman, Mr. Bhaskar Paul and Mr. Vikrant Kayan as its members.

During the Financial Year 2024-25, 2 (Two) meeting of the Nomination and Remuneration Committee of the Board of Directors was held on 24.05.2024 and 08.08.2024.

20. STAKEHOLDERS RELATIONSHIP COMMITTEE

The Composition of the Stakeholders Relationship Committee is in accordance with the requirements of section 178 of the Companies Act, 2013, and comprises of Mr. Vikash Dubey as Chairman, Mr. Bhaskar Paul and Mr. Debjit Banerjee as its members.

During the Financial Year 2024-25, 2 (Two) Meetings were held on 24.05.2024 and 08.08.2024.

21. MEETING OF INDEPENDENT DIRECTORS

The Independent Directors of the Company at their meeting held on 24.05.2024 reviewed the performance of non-independent directors and the Board as a whole including the Chairman of the Company by taking into consideration views expressed by the executive directors and non-executive directors at various levels pertaining to the quality, quantity and timeliness of flow of information between the company, management and the board have expressed their satisfaction.

22. DECLARATION BY THE INDEPENDENT DIRECTORS

The independent directors have submitted a declaration of independence, stating that they meet the criteria of independence provided under section 149(6) of the Act, as amended, and regulation 16 of the SEBI Listing Regulations.

The Board had taken on record the declaration and confirmation submitted by the independent directors regarding meeting the prescribed criteria of independence, after undertaking due assessment of the veracity of the same in terms of the requirements of regulation 25 of the SEBI Listing Regulations.

23. CORPORATE GOVERNANCE REPORT

Pursuant to Regulation 15 of SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, the compliance with the Corporate Governance provisions specified in Regulations 17 to 27 and Clauses (b) to (i) of sub-regulation (2) of Regulation 46 and para C, D and E of Schedule V shall not apply to the Company and hence the Corporate Governance Report does not form part of this report.

24. RELATED PARTY TRANSACTIONS

All Related Party Transactions that were entered into during the financial year were on an arm's length basis, in the ordinary course of business and were in compliance with the applicable provisions of the Act and the Listing Regulations. There were no materially significant Related Party Transactions made by the Company with Promoters, Directors, Key Managerial Personnel which may have a potential conflict with the interest of the Company at large. Hence there do not exist any details to be mentioned in Form AOC-2 which is attached as "**Annexure - A**".

All Related Party Transactions are placed before the Audit Committee for approval. The Company has adopted a Related Party Transactions Policy. The policy as approved by the board is uploaded on the Company's website at - www.newetradewings.com.

25. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

During the financial year under review no loan, guarantees or investments given by the company

26. MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Management Discussion and Analysis Report as stipulated under SEBI (Listing Obligations and Disclosure Requirements), 2015 forms part of this report which is attached as “**Annexure - B**”.

27. EXTRACT OF ANNUAL RETURN

In accordance with the requirements of Section 92 (3) read with Section 134(3)(a) of the Companies Act, 2013 the Annual Return as on 31st March, 2025 is available on the Company’s website at www.newetradewings.com.

28. RISK MANAGEMENT POLICY

The Board of Directors have adopted a risk management policy for the Company which provides for identification, assessment and control of risks which in the opinion of the Board may pose significant loss or threat to the Company. The Management identifies and controls risks through a defined framework in terms of the aforesaid policy.

29. WHISTLE BLOWER POLICY/ VIGIL MECHANISM

The Company has a whistle blower policy encompassing vigil mechanism pursuant to the requirements of the section 177(9) of the Act and regulation 22 of the SEBI Listing Regulations. The Audit Committee reviews the functioning of the Whistle blower policy. The policy/vigil mechanism enables directors and employees to report to the management their concerns about unethical behavior, actual or suspected fraud or violation of the company’s code of conduct or ethics policy and leak or suspected leak of unpublished price sensitive information.

The whistle blower policy is uploaded on the website of the Company and can be accessed at www.newetradewings.com.

30. INTERNAL CONTROL SYSTEMS

The internal financial controls of the Company are commensurate with its size, scale and complexity of operations. The company has policies and procedures which inter alia ensure integrity in conducting business, timely preparation of reliable information, accuracy and completeness in maintaining accounting records and prevention and detection of frauds and errors. The Audit Committee actively reviews the adequacy and effectiveness of the internal financial control systems and suggests improvements if any to strengthen the same.

31. CORPORATE WEBSITE:

The Company's web address is www.newetradewings.com. The website contains a complete overview of the Company. The Company's Annual Report, financial results, details of its business, shareholding pattern, compliance with Corporate Governance, contact information of the designated officials of the Company who

are responsible for assisting and handling investor grievances, the distribution schedule, and Code of Conduct are uploaded on the website.

32. DIRECTOR'S RESPONSIBILITY STATEMENT

In compliance of section 134(5) of the Act, the directors state that:

- (i) in the preparation of the annual accounts, the applicable accounting standards have been followed along with proper explanation relating to material departures.
- (ii) they have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the Company at the end of the financial year and of the profit of the Company for FY 2024-2025.
- (iii) they have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities.
- (iv) they have prepared the annual accounts on a going concern basis.
- (v) they have laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and are operating effectively.
- (vi) they have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems are adequate and are operating effectively.

33. STATUTORY AUDITORS AND HIS REPORT

M/s. PAMS & Associates., Chartered Accountants (Firm Reg. No. 316079E), were reappointed as Statutory Auditors of the Company from 11th Annual General Meeting till the conclusion of the 16th Annual General Meeting. As per the provisions of Section 139 of the Act, they have confirmed that they are not disqualified from continuing as Auditors of the Company.

The Audit Report of M/s. PAMS & Associates., Chartered Accountants (Firm Reg. No. 316079E) on the Financial Statements of the Company for the Financial Year 2024-25 forms part of this Annual Report. The report does contain qualification, reservation, adverse remark or disclaimer viz.

34. SECRETARIAL AUDITOR AND HIS REPORT

Pursuant to the provisions of section 204 of the Act, the Board has appointed M/s Suprabhat & Co., Practising Company Secretary (C.P. No. 15878), to undertake secretarial audit of the Company. A report from the secretarial auditor in the prescribed Form MR-3 is annexed as “**Annexure-C**” to this Report.

The following observation given in the Secretarial Compliance Report:

- 1. Company Secretary and Chief Financial Officer not appointed by the Company;*
- 2. Filing of AOC-4, MGT-7 and MGT-14 for approval of Director Report and Financial Report not filed, However, the management agreed to file them belatedly with additional fees;*
- 3. Company is under Suspension at BSE Ltd and BSE Ltd imposed fine under SEBI SOP procedures.*

35. DISCLOSURE AS TO MAINTENANCE OF COST RECORDS AS SPECIFIED BY THE CENTRAL GOVERNMENT UNDER SECTION 148 (1) OF THE COMPANIES ACT, 2013:

Not applicable

36. DEMATERIALIZATION OF SHARES:

83.15% of the Company's paid up Equity Shares Capital is in dematerialization form as on 31st March, 2025 and balance 16.85% is in physical form.

Adroit Corporate Services Pvt. Ltd, 18/20, Jaferbhoy Industrial Estate, 1st floor, Makwana Road, Marol naka, Andheri East, Mumbai, Maharashtra, 400059 is Share Registrar and Transfer Agents of the Company.

37. SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE COURTS/REGULATORS

During year, BSE Ltd imposed SEBI SOP fine for not complying the SEBI (LODR) Regulations.

38. PARTICULARS OF EMPLOYEES

Considering the provisions of Section 197(12) of the Act read with the relevant rules and having referred to provisions of the First Proviso to Section 136(1) of the Act, the Annual Report is being sent to the members of the Company, excluding details of particulars of employees and related disclosures. The said information/ details is available for inspection at the Registered Office of the Company during working hours on any working day. Any member interested in obtaining this information may write to the company and this information would be provided on request.

39. DISCLOSURES AS PER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The Company has adopted a policy on Prevention, Prohibition and Redressal of Sexual Harassment at the Workplace, in line with the provisions of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act 2013 and the Rules thereunder. The Policy aims to provide protection to employees at the workplace and prevent and redress complaints of sexual harassment and for matters connected or incidental thereto, with the objective of providing a safe working environment, where employees feel secure. The Company has not received any complaint of sexual harassment during the financial year 2024-2025.

40. HEALTH, SAFETY AND ENVIRONMENT

The company considers safety, environment and health as the management responsibility and therefore being constantly aware of its obligation towards maintaining and improving the environment across various spheres of its business activities.

41. CONSERVATION OF ENERGY, TECHNOLOGY AND FOREIGN EXCHANGE EARNING AND OUTGO

Since, the Company neither owned, or operates any manufacturing unit or facility nor has carried out any transaction involving foreign exchange inflow or outflow, there is no information which needs to be disclosed in respect of Conservation of Energy, Technology Absorption and Foreign Exchange earnings and outgo as per Section 134 of the Companies Act, 2013.

42. ACKNOWLEDGEMENT

The Board of Directors would like to express its gratitude and its appreciation for the support and co-operation from its members, RBI and other regulators. The Board of Directors also places on record its sincere appreciation for the commitment and hard work put in by the Management and the employees of the Company.

Date: 28.08.2025
Place: Kolkata

VIKASH DUBEY
Director
DIN : 06548810

VIKRANT KAYAN
Director
DIN : 00761044

Annexure – A

FORM NO. AOC-2

Form for disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 including certain arm's length transactions under third proviso thereto

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

1. Details of contracts or arrangements or transactions not at arm's length basis : Nil

- (a) Name(s) of the related party and nature of relationship
- (b) Nature of contracts/arrangements/transactions
- (c) Duration of the contracts/arrangements/transactions
- (d) Salient terms of the contracts or arrangements or transactions including the value, if any
- (e) Justification for entering into such contracts or arrangements or transactions
- (f) Date(s) of approval by the Board
- (g) Amount paid as advances, if any:
- (h) Date on which the special resolution was passed in general meeting as required under first proviso to section 188

2. Details of material contracts or arrangement or transactions at arm's length basis : Nil

- (a) Name(s) of the related party and nature of relationship
- (b) Nature of contracts/arrangements/transactions
- (c) Duration of the contracts/arrangements/transactions
- (d) Salient terms of the contracts or arrangements or transactions including the value, if any:
- (e) Date(s) of approval by the Board, if any:
- (f) Amount paid as advances, if any:

Date: 28.08.2025
Place: Kolkata

VIKASH DUBEY
Director
DIN : 06548810

VIKRANT KAYAN
Director
DIN : 00761044

Annexure - B

MANAGEMENT DISCUSSION AND ANALYSIS

INDUSTRY OVERVIEW

Industrial sector plays an important role in realizing higher economic growth in the country. India has become one of the most attractive destinations for investments in the manufacturing sector. With the help of Make in India drive, India is on the path of becoming the hub for hi-tech manufacturing as global giants or are in process of setting up manufacturing plants in India, attracted by India's market of more than a billion consumers and increasing purchasing power. Foreign Direct Investment (FDI) inflows in India's manufacturing sector grew. Various initiatives launched by the Government of India, such as 'Make in India', 'Invest India', 'Start-Up India, and e-biz Mission Mode projected under the National e-Governance plan are expected to further improve the ease of doing business and provide a boost to manufacturing in the Country. The Agriculture and Allied sector witnessed an improved rate of growth in FY. This is largely on account of normal monsoon throughout the Country for the current fiscal.

OUTLOOK

The outlook for the Company appears bright on a long term basis. The Company is hopeful that its performance would be encouraging in the coming years. In line with the increase in revenue, the company foresees handsome growth in its bottom line also.

Your Company is engaged in the business of Trading in Iron & steel and other commodities, which is one of the basic industries of the country and plays an important role in strengthening the economy. Iron is the most important and widely used metal in the world, due to its hardness, strength and durability. Actually we live in an iron and steel age. The iron and steel industry is the basic or the key industry as all other industries depend on it. The growth in the Indian iron and steel sector has been driven by domestic availability of raw materials such as iron ore and cost-effective labour. Consequently, the steel sector has been a major contributor to India's manufacturing output. So with the growing Economy there will be immense opportunities for your company to improve its results. The vision of your Company is to strive towards recognition as key player in commodities, Iron & Steel Industries and to achieve its objectives with excellence, fairness & courtesy towards factors of the organization. Your Company commits itself to ethical and sustainable operation and development of all business activities according to responsible care and its own code of conduct.

The threats for the company's business mainly comprises of changes in government policies of various countries. However the management with its dynamism in consultation with its core team can tune in with the threats (if any) due to government policy changes.

RISK AND CONCERNS:

Risks can come from uncertainties in financial markets, legal liabilities, credit risk, accidents, natural causes and disasters. Your Company has adopted appropriate procedure and policies to safeguard it against such type of risks and uncertainty.

HUMAN RESOURCES:

Your Company believes in creating a workspace where diverse set of people can contribute and thrive. Our Vision is to deliver best service at optimal cost by making every employee a fully engaged and aligned team member. Developing and strengthening capabilities for all employees in your Company has remained an ongoing priority.

CAUTIONARY STATEMENT:

Certain statements made in the Management Discussion and Analysis Report relating to Company's objectives, projections, outlook, expectations, and estimates may constitute forward looking statements within the meaning of the current market and economic scenario with applicable laws and regulations. Actual results may differ from such expectations, projections in the capital market. Several other factors also could make a significant difference to the Company's operations such as economic condition, Government regulations and taxation, etc.

Date: 28.08.2025

Place: Kolkata

VIKASH DUBEY

Director

DIN : 06548810

VIKRANT KAYAN

Director

DIN : 00761044

ANNEXURE- C

FORM NO. MR-3 SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2025

[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,
M/s Newever Trade Wings Limited
CIN: L74999WB2012PLC181106
238B, A.J.C BOSE ROAD, UNIT 4B,
FOURTH FLOOR,
KOLKATA – 700020
WEST BENGAL, INDIA**

We have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **M/s NEWEVER TRADE WINGS LIMITED** (hereinafter called the Company). Secretarial Audit was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on our verification of the Company's books, papers, minute books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, We hereby report that in our opinion, the Company has, during the audit period covering the financial year ended on March 31st, 2025 complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter.

We have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on March 31st, 2025, according to the provisions of:

- a) The Companies Act, 2013 (the Act) and the rules made there under;
- b) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
- c) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
- d) Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings;
- e) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
 - (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; **(Not applicable to the Company during the Audit Period)**
- (d) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulation, 2014; **(Not applicable to the Company during the Audit Period)**
- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the Audit Period)**
- (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not applicable to the Company during the Audit Period)** and;
- (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; **(Not applicable to the Company during the Audit Period)**

We have relied on the representation made by the Company and its Officers for systems and mechanism formed by the Company for compliances under other applicable Acts, Laws and Regulations to the Company.

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

1. *The Securities and Exchange Board of India (Listing Obligation and Disclosure Requirement) Regulation, 2015 (the "LODR");*
2. *Secretarial Standard issued by The Institute of Company Secretaries of India;*

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above Subject to the following Observation:

- 1. Company Secretary and Chief Financial Officer not appointed by the Company;**
- 2. Filing of AOC-4, MGT-7 and MGT-14 for approval of Director Report and Financial Report not filed, However, the management agreed to file them belatedly with additional fees;**
- 3. Company is under Suspension at BSE Ltd.**

We further report that

- The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors and Independent Directors.
- Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda sent at least seven days in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.
- Majority decision is carried through while the dissenting members' views are captured and recorded as part of the minutes.

We further report that there are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further report that there is scope to improve the systems and processes in the company and operations of the company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

We further report that, during the audit period the company had following events which had bearing on the Company's affairs in pursuance of the above referred laws, rules, regulations, guidelines, etc.

For Suprabhat & Co
Practicing Company Secretary
Sd/-
CS Suprabhat Chakraborty
Proprietor
Membership No. A41030
C.P. No. 15878
UDIN: A041030G001940081
Peer Review No. 2284/2022

Date :- 28.08.2025

Place :- Kolkata

THIS REPORT IS TO BE READ WITH OUR LETTER OF EVEN DATE WHICH IS ANNEXED AS ANNEXURE- A AND FORMS AN INTEGRAL PART OF THIS REPORT.

“Annexure A”

**To,
The Members,
M/s Newever Trade Wings Limited
CIN: L74999WB2012PLC181106
238B, A.J.C BOSE ROAD, UNIT 4B,
FOURTH FLOOR,
KOLKATA – 700020
WEST BENGAL, INDIA**

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

1. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on our audit.
2. We have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in Secretarial records. We believe that the process and practices, we followed provide a reasonable basis for our opinion.
3. We have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, we have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
5. The Compliance of the provisions of Corporate and other applicable laws, rules, regulations, standards are the responsibility of management. Our examination was limited to the verification of procedure on test basis.
6. The Secretarial Audit Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

**For Suprabhat & Co
Practicing Company Secretary
Sd/-
CS Suprabhat Chakraborty
Proprietor
Membership No. A41030
C.P. No. 15878
UDIN: A041030G001940081
Peer Review No. 2284/2022**

**Date :- 28.08.2025
Place :- Kolkata**

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

[PURSUANT TO REGULATION 34(3) AND SCHEDULE V PARA C CLAUSE (10) (i) OF
THE SEBI (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS)
REGULATIONS, 2015]

**To,
The Members,
NEWEVER TRADE WINGS LIMITED**

I have examined the following documents:

- a. Declaration of non-disqualification as required under section 164 of the Companies Act 2013,
- b. Disclosure of concern of interest as required under section 184 of the Act. (hereinafter referred to as relevant documents) as received from the Directors of Newever Trade Wings Ltd bearing CIN- L74999WB2012PLC181106, having its registered office at 238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR, KOLKATA – 700020 (herein after referred to as 'the Company'), and the relevant registers, records, forms, and returns maintained by the Company and made available to me by the Company for the purpose of issuing this certificate in accordance with regulation 34(3) read with schedule V Part C Clause 10(i) of the Securities and Exchange Board of India (Listing Obligations and Disclosure requirements) Regulations 2015.

Based on the examination as aforesaid, and such other verification carried out by us as deemed necessary and adequate (including Director Identification Number (DIN) status of the respective directors at the portal www.mca.gov.in in our opinion and best of our belief, information and knowledge and according to the explanations provided by the Company its officers and authorised representatives and written representation made by the respective directors, we hereby certify that none of the Directors on the board of the Company as stated below for the financial year ending on 31st March 2025 have been debarred or disqualified from being appointed or continuing as the director of the Company by the Securities and Exchange Board of India, Ministry of Corporate Affairs or any such other statutory authority.

Sr. No.	Name of Director	DIN	Date of appointment in Company	Date of Cessa tion
1	Vikash Dubey	06548810	02.07.2013	-
2	Girija Banerjee	06702931	10.08.2016	-
3	Vikrant Kayan	00761044	23.05.2012	-
4	Bhaskar Paul	06545416	02.07.2013	-
5	Debjit Banerjee	06702931	17.01.2017	-

Ensuring the eligibility for the appointment/ continuity as the director of the board is the responsibility of the management of the Company. My responsibility is to express an opinion based on our verification and representation made by the respective directors.

This Certificate is neither an assurance as to the future viability of the Company nor the efficiency or effectiveness with which the management has conducted the affairs of the Company.

For Suprabhat & Co
Practicing Company Secretary
Sd/-
CS Suprabhat Chakraborty
Proprietor
Membership No. A41030
C.P. No. 15878
UDIN: A041030G003838604
Peer Review No. 2284/2022

Date :- 28.08.2025

Place :- Kolkata



P A M S & ASSOCIATES

CHARTERED ACCOUNTANTS



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INDEPENDENT AUDITOR'S REPORT

To the Members of
NEWEVER TRADING WINGS LIMITED

Report on the Audit of Financial Statements

Qualified Opinion

We have audited the accompanying financial statements of NEWEVER TRADING WINGS LIMITED ("the Company"), which comprise the Balance Sheet as at 31 March 2025, 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 then ended, and a summary of the significant accounting policies and other explanatory information.

In our opinion, except for the possible effects of the matters described in the Basis for Qualified Opinion section of our report, the accompanying financial statements present fairly, in all material respects, the financial position of the Company as at 31 March 2025, and its loss, total comprehensive income, its changes in equity and its cash flows for the year then ended in accordance with the Indian Accounting Standards ("Ind AS") prescribed under section 133 of the Companies Act, 2013 ("the Act"). Our qualification is in respect of the matters described under *Key Audit Matters*, which also form an integral part of this opinion.

Basis for Qualified Opinion

Statutory Non-Compliance: The Company has not complied with certain provisions of the Companies Act, 2013, SEBI (LODR) Regulations, 2015 and other applicable laws during the year, including:

- Non-holding of Annual General Meeting within the prescribed time.
- Non-filing/delay in filing of statutory returns and financial statements with the Registrar of Companies.
- Non-compliance with various SEBI LODR requirements relating to timely submission of quarterly results, corporate governance reporting, and publication of notices.

Delay in Signing of Audit Report: This audit report for the financial year ended 31 March 2025 is being signed on the current date in 2025. While conducting this audit, we have considered the requirements of SA 560 *Subsequent Events*, and taken into account certain events and transactions that occurred between 1 April 2025 and the date of signing this report. The above delays constitute non-compliance with the Act and SEBI regulations, which may attract regulatory actions.

The Company, a listed entity, has not filed its financial statements with the Registrar of Companies (ROC) or made requisite submissions to the Securities and Exchange Board of India (SEBI) since the financial year ended 31 March 2017 and has not filed its income tax returns from the financial year 2019-20 onwards.

The last audited financial statements of the Company were prepared in accordance with the previous Generally Accepted Accounting Principles in India ("Indian GAAP") several years ago. No audited financial statements have been prepared for the intervening periods. The financial statements for the year ended 31 March 2018 are the first to be prepared in accordance with Ind AS, with the transition date being 1 April 2015.

Due to the absence of audited financial information for the intervening years, and incomplete accounting records for certain historical periods in compliance with INDAS, we were unable to obtain sufficient appropriate audit evidence regarding:

- The opening balances as at 1 April 2015 (Ind AS transition date) and as at 1 April 2017 (comparative year).

Branch Offices at Cuttack, Bhubaneswar, Puri, and New Delhi





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- The completeness, accuracy, and existence of certain prior period transactions and balances carried forward into the current year's financial statements. Accordingly, we were unable to determine whether adjustments might have been necessary in respect of these matters.

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Act. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the 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 ethical requirements that are relevant to our audit of the financial statements under the provisions of the Act, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the ICAI Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our qualified opinion. The Statutory Audit for the FY 2015-16 was conducted in accordance with Indian GAAP (IGAAP), and the audited financial statements were duly filed with the Registrar of Companies (ROC) and submitted to SEBI.

Since the Company is a listed entity, it was required to transition its financial statements from IGAAP to Ind AS in compliance with statutory requirements. Accordingly, the opening balances as of the Ind AS transition date were restated, and subsequent financial years have also been prepared in compliance with Ind AS.

Although the financial statements for FY 2016-17 were already audited by the previous statutory auditor under IGAAP, the management, in compliance with statutory requirements, has requested us to carry out an audit of the Ind AS restated financials for that year as well. This ensures consistency and comparability of the financial statements under the Ind AS framework.

"The matters described under *Key Audit Matters* form an integral part of our basis for qualification."

Material Uncertainty Related to Going Concern

We draw attention to Note [X] to the financial statements, which indicates that the Company has not complied with statutory filing requirements with ROC, SEBI, Income Tax authorities and other statutory authorities for multiple years and has not maintained continuous audited records. These events and conditions indicate that a material uncertainty exists that may cast significant doubt on the Company's ability to continue as a going concern. Further, the Company has been incurring continuous losses, and its business operations and transactions have remained largely suspended for several years. These events and conditions indicate the existence of a **material uncertainty** that may cast significant doubt on the Company's ability to continue as a going concern. Our opinion is not modified in respect of this matter.

Loans And Advances, Trade Receivables, And Trade Payables

The balances of loans and advances, trade receivables, and trade payables are subject to reconciliation and have not been confirmed by the respective parties. Consequently, we were unable to obtain sufficient and appropriate audit evidence regarding the accuracy, completeness, and existence of these balances.

Emphasis of Matter

We draw attention to the fact that these restated standalone Ind AS financial statements are prepared subsequent to their original audit under IGAAP, and our audit report does not supersede the earlier audit reports issued under IGAAP but provides an opinion only on the restated Ind AS financial statements.

Our opinion is qualified in respect of this matter.

1. **Adjournment of Annual General Meeting:** The Company adjourned the Annual General Meeting to finalize the accounts, as the corporate office was taken over by ICICI Bank under the provisions of the SARFAESI Act.
2. We draw attention to the fact that the Annual General Meeting (AGM) of the Company for certain earlier years could not be held within the time prescribed under the Companies Act.





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2013, as the financial statements were not ready for adoption. The Company has subsequently filed for condonation/regularisation with the Registrar of Companies (ROC), and the delay has been regularised. Our opinion is not modified in respect of this matter.

Key Audit Matters

Key Audit Matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements. In this case, the Key Audit Matters described below are also matters that have led to our Qualified Opinion.

1. Losses, Net Worth Erosion, and Going Concern:

- The Company has incurred substantial losses and its net worth has been completely eroded.
- No revenue-generating activity has been carried out during the financial year 2017-18.
- Management has prepared the accounts on a going concern basis, though significant uncertainty exists.

We considered this matter to be of most significance as it impacts the Company's ability to continue as a going concern and directly forms the basis of our qualified opinion.

2. Preparation of Financial Statements after Extended Non-compliance with Regulatory Filing Requirements:

Description of matter:

The Company, a listed entity, has not filed its financial statements with the Registrar of Companies (ROC) or made the requisite submissions to the Securities and Exchange Board of India (SEBI) since the financial year ended 31 March 2018. Further, the Company has also not filed income tax returns from the financial year 2018-19 onwards. The current year's financial statements are prepared under the Indian Accounting Standards ("Ind AS") for the first time, with the transition date being 1 April 2015.

These circumstances indicate significant regulatory non-compliance and potential legal consequences. They also raise questions about the Company's ability to continue as a going concern, given the absence of timely and accurate financial reporting for multiple years.

How the matter was addressed in the audit:

- Evaluated management's assessment of the Company's ability to continue as a going concern, including assessment of available financial resources, operational status, and ongoing litigations.
- Examined correspondence with regulatory authorities and legal advisors regarding the non-compliances and potential penalties.
- Considered whether adequate disclosures have been made in the financial statements regarding these matters.

3. First-time Adoption of Ind AS after Significant Gap in Financial Reporting

Description of matter:

The Company has prepared its financial statements in accordance with Ind AS for the first time, with the transition date being 1 April 2015. The last audited financial statements, filed several years ago, were prepared under Indian GAAP. There has been no continuous audited financial information since then. The opening Ind AS balances have been prepared using management's reconstruction of financial records for the intervening years, based on available supporting documents and management estimates.

Given the long gap, the completeness and accuracy of historical financial data, as well as the appropriateness of adjustments made for Ind AS transition, involve significant management judgement and estimation.



How the matter was addressed in the audit:

- Evaluated the process and assumptions used by management for reconstructing historical financial information and Ind AS transition adjustments.
- Verified selected historical transactions and balances on a test-check basis with available supporting documentation.
- Assessed whether the Ind AS 101 "First-time Adoption" adjustments have been made in accordance with the standard.
- Evaluated the adequacy of disclosures relating to transition and limitations in historical data.

4. Limitation of Audit Scope due to Unavailability of Sufficient Appropriate Audit Evidence for Prior Periods

Description of matter:

Due to the absence of audited financial statements for several prior years and incomplete accounting records for certain historical periods, we were unable to obtain sufficient appropriate audit evidence in respect of opening balances and certain comparative financial information. This has resulted in a limitation on the scope of our audit, particularly in relation to verification of prior period figures and the opening equity position at the Ind AS transition date.

How the matter was addressed in the audit:

- Performed alternative audit procedures, including review of available bank statements, statutory records, and board resolutions where feasible.
- Assessed the impact of the scope limitation on the current year's audit opinion and included a separate "Basis for Qualified Opinion" paragraph accordingly

5. Key Audit Matter – Significant Write-off and Write-back of Loans, Sundry Creditors, and Debtors

Description of the matter:

During the year, the Company has recorded significant write-offs of certain loan balances and sundry debtor balances, and write-backs of sundry creditor balances in the Statement of Profit and Loss. These adjustments were made based on management's assessment of recoverability and obligations.

The amounts involved are material to the financial statements. Such write-offs and write-backs require significant management judgement in assessing recoverability of receivables, existence and validity of liabilities, and the appropriateness of derecognising financial assets and liabilities in accordance with Ind AS 109 "Financial Instruments" and Ind AS 37 "Provisions, Contingent Liabilities and Contingent Assets."

There is a risk that such adjustments may not be supported by adequate documentary evidence and may not comply with the recognition and measurement principles of the applicable accounting standards, or may involve management bias in financial reporting.

How the matter was addressed in the audit:

Our audit procedures included, among others:

- Obtaining a detailed schedule of all loan, debtor, and creditor balances written off or written back during the year, and reconciling them with the general ledger.
- Evaluating the business rationale for the write-offs and write-backs, including review of correspondence in some cases and board approvals where applicable.
- For receivables written off, assessing whether the Company had taken all reasonable steps for recovery and whether such balances met the criteria for derecognition under Ind AS 109.
- For liabilities written back, verifying the absence of present obligations by reviewing correspondence with the parties and other relevant documentation, and assessing compliance with Ind AS 37.
- Evaluating the adequacy and completeness of related disclosures in the financial statements, including the accounting policy, nature, and quantum of such adjustments.



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Based on the procedures performed, we assessed the reasonableness of management's judgements and the appropriateness of the accounting treatment of such write-offs and write-backs.

Responsibilities of Management and Those Charged with Governance for the Financial Statements

Management is responsible for the preparation and presentation of these financial statements in accordance with Ind AS and the provisions of the Act, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the 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.

Those charged with governance are responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the 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 financial statements.

As part of an audit in accordance with SAs, we:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls system in place and the operating effectiveness of such controls.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.



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From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1. As required by section 143 (3) of the Act, based on our audit we report that:
 - a. We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit except as stated in the Basis for Qualified Opinion paragraph above.
 - b. In our opinion, proper books of account as required by law have been kept by the Company so far as appears from our examination of those books, except for the effects/possible effects of the matter described in the Basis for Qualified Opinion paragraph above.
 - c. The Balance Sheet, the Statement of Profit and Loss (including Other Comprehensive Income), the Statement of Changes in Equity and the Statement of Cash Flows dealt with by this Report are in agreement with the books of account, except for the effects/possible effects of the matter described in the Basis for Qualified Opinion paragraph above.
 - d. In our opinion, the aforesaid standalone Ind AS financial statements comply with the Accounting Standards specified under section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014, except for the non-compliance described in the Basis for Qualified Opinion paragraph above.
 - e. On the basis of written representations received from the directors as on the date of this report, taken on record by the Board of Directors, none of the directors is disqualified as on **31 March 2025** from being appointed as a director in terms of Section 164(2) of the Act, **except that certain statutory non-compliances noted in the Basis for Qualified Opinion paragraph above may have implications on such disqualification assessment.** However on our enquiry, the management informed that the KYC of the directors will be updated in MCA. In the absence of such written representations and other sufficient appropriate audit evidence, we are unable to comment on whether any director is disqualified as on March 31, 2025 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**" to this report.
 - 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 according to the information and explanations given to us, we are **unable to comment** whether the remuneration paid by the Company to its directors during the year ended 31 March 2025 is in accordance with the provisions of section 197 of the Act, and

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whether any dividend, if declared, has been paid in compliance with section 123 of the Act, as the Company has not complied with statutory requirements relating to holding of Annual General Meeting, maintenance of necessary records, and filing of returns with the Registrar of Companies. Accordingly, this constitutes a limitation on the scope of our work and forms part of the matters described in the Basis for Qualified Opinion paragraph above.

- 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:
- The Company has disclosed the impact of pending litigations on its financial position in its financial statements - Refer Note ____
 - The Company did not have any long-term contracts including derivative contracts for which there were any material foreseeable losses.
 - According to the information and explanations given to us, the Company was **not required to transfer any amounts to the Investor Education and Protection Fund** during the year ended **31 March 2025**, as no dividend has been declared and no such amounts were outstanding to be transferred.
 - 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;
 - 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 received by the 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 the Ultimate Beneficiaries;
 - Based on such audit procedures that we considered reasonable and appropriate in the circumstances, **except for the possible effects of the matters described in the Basis for Qualified Opinion paragraph, nothing has come to our notice that has caused us to believe that the representations under sub-clauses (a) and (b) contain any material misstatement.** However, due to the non-maintenance of certain statutory records and absence of complete documentation, we were unable to independently verify the correctness of the above representations.
 - With respect to the Final Dividend:
We are unable to comment whether the final dividend, if any, proposed in the previous year and declared and paid by the Company during the year is in accordance with section 123 of the Companies Act, 2013, as applicable, due to the absence of adequate statutory

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records, minutes of Annual General Meeting, and supporting documentation. This matter is also described in the Basis for Qualified Opinion paragraph above.

- vi. With respect to the reporting on the use of accounting software having an audit trail (edit log) feature:

With respect to the requirement relating to the use of accounting software having an **audit trail (edit log) feature** as prescribed under **Rule 11(g)** of the Companies (Audit and Auditors) Rules, 2014, we note that the said requirement **came into effect from 1 April 2023**. However, we further draw attention to the fact that the Company has **not filed its statutory returns and financial statements** with the **Registrar of Companies (ROC)**, **SEBI**, **Income Tax authorities**, and other statutory authorities for multiple years. Due to such **statutory non-compliances** and the **absence of adequate and continuous accounting records**, we are **unable to comment** whether :

- the accounting software used during the year ended **31 March 2025** had an **audit trail (edit log) feature**, or
- the **integrity and completeness** of the underlying transaction logs was maintained.

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.

For Pams & Associates

Chartered Accountants

Firm Registration number: 316079E

Uine

CA Manoranjan Mishra

Partner

Membership Number: 063698

UDIN: 25063698-515AJQ-4982

Place: Bhubaneswar

Date: 28.08.2025





PAMS & ASSOCIATES

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Annexure "A" TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 1(f) under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of NEWEVER TRADING WINGS LIMITED of even date)

Report on the Internal Financial Controls over Financial Reporting under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ("the Act")

We have audited the internal financial controls over financial reporting of **NEWEVER TRADING WINGS LIMITED** ("the Company") as of 31 March 2025 in conjunction with our audit of the standalone financial statements of the Company for the year ended on that date.

Opinion

In our opinion, **except for the possible effects of the material weaknesses described in the "Basis for Qualified Opinion" paragraph below**, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such controls were operating effectively as at 31 March 2025, based on the 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 ICAI.

Basis for Qualified Opinion

The Company did not have an appropriate internal control system for:

- Timely statutory compliance and maintenance of statutory records.
- Proper documentation and verification of certain transaction.
- Conduct of physical verification of assets

These weaknesses could result in material misstatements in the Company's financial statements

Management's Responsibility for Internal Financial Controls

The Board of Directors of the company is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India (the "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 Act.

Auditors' 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") issued by the ICAI and the Standards on Auditing specified under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

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





P A M S & ASSOCIATES

CHARTERED ACCOUNTANTS

Head Office : Plot No: - 506, Unit - IX, Bhoi Nagar, Behind Baya Baba Math, Bhubaneswar - 751022

Telephone No : 0674- 2543828 , Mobile: +91-9437076636

E-mail : jectmishra36@gmail.com itpams@gmail.com

PAMS
Associates

(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 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 with reference to these financial statements 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

For Pams & Associates

Chartered Accountants

Firm Registration number: 316079E

Uline

CA Manoranjan Mishra

Partner

Membership Number: 063698

UDIN: 25063698-15A504982

Place: Bhubaneswar

Date: 28.08.2025





PAMS & ASSOCIATES

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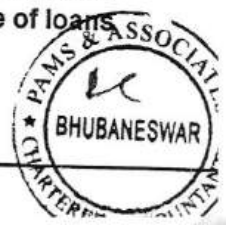
ANNEXURE 'B' TO THE INDEPENDENT AUDITOR'S REPORT

(Referred to in paragraph 2 under 'Report on Other Legal and Regulatory Requirements' section of our report to the Members of NEWEVER TRADING WINGS LIMITED of even date).

Disclaimer on Applicability:

The reporting period under audit is the financial year ended 31 March 2025, for which the applicable order was the Companies (Auditor's Report) Order, 2016 ("CARO 2016"). However, as the audit report is being issued on the current date in 2025, we are furnishing our comments in the format prescribed under CARO 2020 for uniformity and to meet current reporting expectations. Our comments are based on the information and explanations given to us and on the basis of the books of account and other records made available to us, which, in several instances, were incomplete or not produced. Accordingly, in many clauses, our comments are qualified or restricted due to limitations in the availability of audit evidence.

- i. In respect of Company's Property, Plant and Equipment and Intangible Assets :
 - (a) The company has not maintained proper records showing full particulars, including quantitative details and situation of Property, Plant and Equipment. Fixed asset registers were not produced for our verification.
 - (b) The company has not carried out a physical verification of its Property, Plant and Equipment during the year. Consequently, we are unable to comment on discrepancies, if any.
 - (c) According to the information and explanations given to us and based on our examination of the records, the company does not own any immovable property. Accordingly, the reporting under clause 3(i)(c) of the Companies (Auditor's Report) Order, 2020 is not applicable.
 - (d) The Company has not revalued any of its Property, Plant and Equipment and intangible assets during the year.
 - (e) We were not provided with sufficient information and explanations to enable us to determine whether any proceedings have been initiated or are pending against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988, and rules made thereunder. Accordingly, we are unable to comment on this matter.
- ii.
 - (a) As explained to us, the company does not have any inventory. Accordingly, reporting under clause 3(ii)(a) of the Companies (Auditor's Report) Order, 2020 is not applicable to the company.
 - (b) The company has not been sanctioned any working capital limits in excess of five crore rupees, in aggregate, from banks or financial institutions on the basis of security of current assets at any point of time during the year. Accordingly, the reporting under clause 3(ii)(b) of the Companies (Auditor's Report) Order, 2020 is not applicable to the company.
- iii.
 - (a) According to the information and explanations given to us and based on our examination of the books of account, the Company **has granted loans and advances in the nature of loans** to its related parties the details of which is given below.





P A M S & ASSOCIATES

CHARTERED ACCOUNTANTS

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E-mail : jectmishra36@gmail.com itpams@gmail.com



Particulars	Closing Balance (Rs. In lakhs)
	31-03-2025
i) Loan and Advance	
Alfred Beverages Pvt. Ltd.	88.78
Total	88.78

(b) However, in the absence of complete supporting documentation such as loan agreements, repayment schedules, and interest terms, we are unable to comment on whether the terms and conditions of such loans and advances are prejudicial to the Company's interest.

(c) Due to incomplete records, we are also **unable to comment** on the regularity of repayments, overdue amounts, or renewals of loans, if any.

(d) Due to the absence of repayment details, **we are unable to determine whether there are any overdue amounts** outstanding for more than ninety days.

(e) Further, owing to the lack of complete information, **we are unable to comment** on whether any loans or advances have been **renewed or extended** or whether any **fresh loans have been granted to settle existing loans**.

(f) Additionally, due to incomplete records, we are unable to confirm whether any loans or advances have been granted without specifying the terms of repayment.

- iv. We were not provided with sufficient information and explanations to enable us to determine whether the company has complied with the provisions of Sections 185 and 186 of the Companies Act, 2013 in respect of loans, guarantees, securities, or investments. Accordingly, we are unable to comment on this matter.
- v. The company has not accepted any deposits from the public during the year. However, we were not provided with sufficient records and information to enable us to verify full compliance with the provisions of Sections 73 to 76 of the Companies Act, 2013 and the directives issued by the Reserve Bank of India. Accordingly, we are unable to comment on this matter.
- vi. We were not provided with sufficient records and information to enable us to ascertain whether the Central Government has prescribed maintenance of cost records under Section 148(1) of the Companies Act, 2013 and whether such records have been maintained by the company. Accordingly, we are unable to comment on this matter.
- vii. (a) The Company is irregular in depositing undisputed statutory dues including GST, income-tax, TDS, PF, ESI, and others with the appropriate authorities. Significant undisputed statutory dues were outstanding for more than six months at the balance sheet date.

(b) There were disputed statutory dues outstanding as on 31 March 2025. The details could not be fully ascertained in the absence of complete records.

However As provided by the management , the following statutory dues are pending as on 31.03.2025 the details of which is given below.



Name of the Statute	Dispute (in brief)	Demand Amount	Forum where dispute is pending
		(Rs.)	
Processing fees for revocation of suspension	Processing fees for revocation of suspension	29,500	Bombay Stock Exchange (BSE)
Reinstatement fees	Reinstatement fees	1,77,000	Bombay Stock Exchange (BSE)
SEBI SOP fines	SEBI SOP fines	43,26,833	Bombay Stock Exchange (BSE)
Income Tax		1,79,45,100	CIT(A)
VAT	ITC Claim	48,74,255	IT Investigation Unit of Commercial taxes, West Bengal

viii. During the course of our examination, we have not come across any unrecorded income of the Company; however, due to limitations in the completeness of books and records made available to us, **we are unable to confirm whether any income has been earned by the Company which has not been recorded in the books of account, in accordance with the provisions of the Income Tax Act, 1961.**

ix. (a) The Company has defaulted in the repayment of dues to banks, financial institutions, and other lenders. However, complete details of such defaults, including the amount and period of default, **could not be verified** due to the absence of confirmations from lenders and incomplete loan records. Consequently, we are **unable to comment** on the full extent of the defaults

(b) We were not provided with sufficient information and records to enable us to determine whether the company has been declared a wilful defaulter by any bank, financial institution, government, or government authorities. Accordingly, we are unable to comment on this matter.

(c) According to the information and explanations provided to us, the term loans taken by the company during the year have been applied for the purposes for which they were obtained.

(d) According to the information and explanations provided to us, the company has not utilised any funds raised on a short-term basis for long-term purposes.

(e) We were not provided with sufficient information and records to enable us to determine whether the company has taken any funds from any entity or person to meet the obligations of its subsidiaries, associates, or joint ventures. Accordingly, we are unable to comment on this matter.

(f) The company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies, hence the clause 3 (ix) (f) of the Order is not applicable to the Company.

x. (a) The Company has not raised moneys by way of initial public offer or further public offer (including debt instruments) during the year and hence reporting under clause 3(x)(a) of the Order is not applicable.



(b) The Company has not made any preferential allotment or private Placement of shares and Convertible Debenture during the year hence reporting under the Clause 3 (x)(b) of the order is not applicable.

- xi. (a) No fraud by the Company or on the Company has been reported to us during the year. However, due to significant weaknesses in internal controls and absence of complete records, we are unable to state whether instances of fraud may have occurred but remained undetected.

(b) No report under sub-section (12) of section 143 of the Companies Act has been filed in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government, during the year and upto the date of this report.

(c) As explained to us the company has not received any whistle blower complaints during the year (and upto the date of this report). Management representation with regards to the same was obtained from the company. However the procedure followed by the company in this regard is not adequate and needs improvement.

- xii. In our opinion and according to the information and explanations given to us, the Company is not a nidhi company. Accordingly, paragraph 3 (xii) (a), (b) and (c) of the Order is not applicable to the Company.

- xiii. Due to the absence of complete records and disclosures, we were unable to obtain sufficient appropriate evidence to comment on compliance by the company with the provisions of Sections 177 and 188 of the Companies Act, 2013 in respect of related party transactions. Accordingly, we are unable to comment on this matter.

- xiv. The Company does not have an internal audit system commensurate with the size and nature of its business.

- xv. Based on the information and explanations available to us, the company has not entered any non-cash transactions with its directors or persons connected with them. However, due to incomplete records, our verification in this regard is limited and we are unable to comment beyond the information provided.

- xvi. (a) In our opinion, the Company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934. Hence, reporting under clause 3(xvi)(a), (b) and (c) of the Order is not applicable.

(b) In our opinion, there is no core investment company within the Group (as defined in the Core Investment Companies (Reserve Bank) Directions, 2016) and accordingly reporting under clause 3(xvi)(d) of the Order is not applicable.

- xvii. The company has incurred cash losses during the financial year under audit as well as in the immediately preceding financial year.

- xviii. According to the information and explanations given to us, the previous statutory auditor of the Company, M/s P K Rai & Co., Chartered Accountants, resigned from their office during the year due to preoccupation in other assignments. We were appointed as statutory auditor of the

NEWEVER TRADE WINGS LIMITED

CIN: L74999WB2012PLC181106

238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR, Kolkata,
KOLKATA, West Bengal, India, 700020

Mail: newevertradewingsltd@gmail.com

Balance Sheet as at 31st. March, 2025

Balance Sheet as at 31st. March, 2025			
Particulars	Note No.	As at	As at
		31st. March, 2025	31st. March, 2024
ASSETS			
1) Non-current assets			
(a) Property, Plant and Equipment	1	-	-
(b) Capital Work-in-Progress	2	-	-
(c) Right of Use Assets	1A		
(d) Investment Property	1B	-	-
(e) Other Intangible assets	1C		
(f) Financial Assets			
(i) Trade receivable	3	-	-
(ii) Other	4A	-	-
(g) Deferred tax assets (net)	5	1,14,624.00	1,34,853.00
(h) Other non-current assets	6A	-	-
2) Current Assets			
(a) Inventories	7	-	-
(b) Financial Assets			
ii) Trade receivables		-	-
iii) Cash and cash equivalents	8	5,48,280.00	5,60,599.00
iv) Bank Balances other than (iii) above	9	-	-
vi) Other	4B	1,21,67,500.00	1,21,67,500.00
(c) Current tax Assets (Net)	10	48,000.00	48,000.00
(d) Other current assets	6B	11,82,000.00	11,82,000.00
Total Assets		1,40,60,404.00	1,40,92,952.00



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Mail: newevertradewingsltd@gmail.com

Balance Sheet as at 31st. March, 2025

Particulars	Note No.	As at	As at
		31st. March, 2025	31st. March, 2024
EQUITY & LIABILITIES			
EQUITY			
a) Equity share capital	11	23,94,52,000.00	23,94,52,000.00
b) Other equity	12	(22,94,69,858.00)	(22,88,07,868.00)
LIABILITIES			
(1) Non-current Liabilities			
(a) Financial Liabilities			
i) Borrowings	13A	-	-
ii) Lease Liabilities	13.1A	-	-
iii) Other financial liabilities	14A	-	-
(b) Provisions	15A	-	-
(c) Deferred tax liabilities (Net)	5		
(2) Current Liabilities			
(a) Financial Liabilities			
i) Borrowings	13B	5,75,000.00	5,75,000.00
ii) Lease Liabilities	13.1B	-	-
iii) Trade payables	16		
(A) Total outstanding dues of micro enterprises and small enterprises; and		-	-
(B) Total outstanding dues of creditors other than micro enterprises and small enterprises		-	-
iii) Other financial liabilities	14B	-	-
(b) Other current liabilities	17	35,03,262.00	28,73,820.00
(c) Provisions	15B	-	-
(d) Current tax liabilities			-
Total equity and liabilities		1,40,60,404.00	1,40,92,952.00

Significant accounting policies and additional notes to accounts.

For Pams & Associates

Chartered Accountants

Firm Registration number 316079E

CA Manoranjan Mishra

Partner

Membership Number: 063698

UDIN: 250636983

Place: Bhubaneswar

Date: 28.08.2025

VIKRANT KAYAN
DIN: 00761044

VIKASH DUBEY
DIN: 06548810

NEWEVER TRADE WINGS LIMITED

CIN: L74999WB2012PLC181106

238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR, Kolkata, KOLKATA, West Bengal, India, 700020

Mail: newevertradewingsltd@gmail.com

Statement of Profit and Loss for the year ended 31st. March, 2025

Particulars	Note No.	For the Year ended 31st March, 2025	For the Year ended 31st March, 2024
I Revenue from operations	18	2,48,711.00	3,42,660.00
II Other Income	19	-	-
Total Income (I+II)		2,48,711.00	3,42,660.00
III			
IV Expenses	20	2,61,030.00	2,96,102.00
Purchases of stock-in-trade	21	-	-
Employee benefits expenses	22	-	-
Finance costs	23	-	-
Depreciation and amortisation expense	24	6,29,442.00	3,01,675.00
Other expenses		8,90,472.00	5,97,777.00
Total expenses (IV)		(6,41,761.00)	(2,55,117.00)
V Profit / (loss) before exceptional items and tax (III-IV)			
VI Exceptional Items		(6,41,761.00)	(2,55,117.00)
VII Profit / (loss) before tax (V-VI)	25		
VIII Tax Expense:			
Current tax		20,229.00	23,801.00
Deferred tax		-	-
Earlier year tax		-	-
Total		20,229.00	23,801.00
		(6,61,990.00)	(2,78,918.00)
IX Profit / (Loss) for the Year from continuing operation (VII-VIII)			
X Profit / (Loss) from discontinuing operations		-	-
XI Tax expense of discontinued operations		-	-
XII Profit / (Loss) from discontinued operations (after tax) (X-XI)		-	-
XIII Profit / (Loss) for the year (IX+XII)		(6,61,990.00)	(2,78,918.00)
XIV Other Comprehensive Income			
A (i) Items that will not be reclassified to Profit or Loss			
Related to employee benefit		-	-
(ii) Income Tax Relating to items that will not be reclassified to Profit or Loss		-	-
B (i) Items that will be reclassified to Profit or Loss			
(ii) Income Tax relating to items that will be reclassified to Profit or Loss		-	-
Total other Comprehensive Income/ (loss) (A+B)		-	-
XV Total Comprehensive Income/ (loss) for the year (XIII + XIV)		(6,61,990.00)	(2,78,918.00)
XVI Earnings per equity shares of face value of Rs.1,000/- each			
i) Basic (In Rs)		(0.11)	(0.04)
ii) Diluted (In Rs)		(0.11)	(0.04)

Significant accounting Policies and additional notes to accounts.

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For Pams & Associates
Chartered Accountants
Firm Registration number 316079E

Manoranjan Mishra
CA Manoranjan Mishra
Partner

Membership Number: 063699
UDIN: 25063698

Place: Bhubaneswar

Date: 28.08.2025



Vikrant Kanan
VIKRANT KANAN
DIN: 00761044

Vikash Dubey
VIKASH DUBEY
DIN: 06548810

NEWEVER TRADE WINGS LIMITED

CIN: L74999WB2012PLC181106

238B, A.J.C BOSE ROAD, UNIT 4B, FOURTH FLOOR, Kolkata, KOLKATA,
West Bengal, India, 700020

Mail: newevertradewingsltd@gmail.com

Statement of Cash Flows for the year ended 31st March, 2025

PARTICULARS	For the Year ended 31st. March, 2025	For the Year ended 31st. March, 2024
A) CASH FLOW FROM OPERATING ACTIVITIES		
Profit before tax	-6,41,761.00	-2,55,117.00
Adjustment for:		
Depreciation, amortisation and impairment	-	-
Finance cost	-	-
Impairment Loss of Fixed Assets	-	-
Income from Investments (Interest)	-	-
Income from Let-out Property	-	-
Profit on sale of Fixed Assets	-	-
Others	-	-
Operating Profit before changes in non-current / current assets / liabilities	-6,41,761.00	-2,55,117.00
Adjustment for changes in:		
Non-current/current financial and other assets	-	-
Non-current/current financial and other liabilities/provisions	6,29,442.00	3,01,675.00
Cash (used in)/generated from operating activities before taxes	-12,319.00	46,558.00
Direct taxes paid (Net of refunds/adjustments)	-	-
Net Cash (used in)/generated from operating activities (A)	-12,319.00	46,558.00
B) CASH FLOW FROM INVESTING ACTIVITIES		
Purchase of Fixed Assets/ Capital Work-in-Progress	-	-
Fixed deposits with banks (placed)/realised (net)	-	-
Sale of fixed Asset	-	-
Purchase of Investments	-	-
Sale of Investments	-	-
Income from Investments (Interest)	-	-
Interest Received	-	-
Net Cash used in Investing Activities (B)	-	-
C) CASH FLOW FROM FINANCING ACTIVITIES		
Interest Cost	-	-
Dividend paid	-	-
Changes in borrowings	-	-
Net Cash generated from financing activities (C)	-	-
INCREASE/(DECREASE) IN CASH AND CASH EQUIVALENTS (A+B+C)	-12,319.00	46,558.00
Cash and cash equivalents at the beginning of the year	5,60,599.00	5,14,041.00
Cash and cash equivalents at the end of the year	5,48,280.00	5,60,599.00

1. All figures in brackets are outflow of cash.

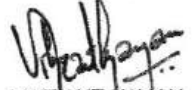
2. Cash flow statement has been prepared under the indirect method as set out in Ind AS -7 issued by the Institute of Chartered Accountants of India.

3. Figures for previous year have been regrouped wherever necessary for uniformity in presentation.

For Pams & Associates
Chartered Accountants
Firm Registration number 316079E


CA Manoranjan Mishra
Partner
Membership Number: 063698


VIKASH DUBEY
DIN: 06548810


VIKRAMT KANYAN
DIN: 00761044

NEWEVER TRADE WINGS LIMITED

CIN NO-L11103MH1985PLC035826

Statement of Changes in Equity for the year ended 31st March, 2025

Amount in Rupees

A) EQUITY SHARE CAPITAL

As at 1st April, 2024	Changes in Equity Share Capital	As at 31st March 2025
23,94,52,000	-	23,94,52,000

B) OTHER EQUITY

Amount in Rupees

PARTICULARS	Reserves and Surplus					Total
	Capital Reserve	Security Premium	General Reserve	Capital Redemption Reserve	Retained Earnings	
Balance as at 1st April 2024	-	-	-	-	(22,88,07,888.00)	(22,88,07,888.00)
Profit for the period	-	-	-	-	(6,61,990.00)	(6,61,990.00)
Dividend for previous year	-	-	-	-	-	-
Other Comprehensive Income (net of tax)	-	-	-	-	(22,94,69,858.00)	(22,94,69,858.00)
Balance as at 31st March 2025	-	-	-	-	-	-



As at 31st March, 2025	As at 31st March, 2024
---------------------------	---------------------------

Note - 1 : B -Investment Property
Investment Property

Total - -

Note - 2 : CAPITAL WORK IN PROGRESS:
CWIP

Total - -

The Movement in Capital Work in Progress:
Balance at the beginning of the year
Additions during the year
Transferred to Fixed Assets during the year
Balance at the end of the year

- -

Note - 3 : TRADE RECEIVABLES

Secured,:

Considered good:

Unsecured:

More than 6 Months:

Considered good

Considered Doubtful

Less : Expected Credit Loss Allowance

Less than 6 Months:

Other debts considered good

Total - -

Note - 4 : OTHER FINANCIAL ASSETS

(A) Non-Current

(a) Trade Advances

(Unsecured & Considered Doubtful)

Less : Provision

b) Security Deposits

c) Bank Deposits with more than 12 months maturity

Total - -



(B) Current

- Short Term Loans and Advances
(Unsecured and considered good)
(Recoverable in cash or kind or for value to be received)
(i) Advances to Govt. of Odisha
(ii) Advances to Staff
(iii) Advances to Contractors / Suppliers / Others

	As at 31st March, 2025	As at 31st March, 2024
	-	-
	-	-
	1,21,67,500.00	1,21,67,500.00
Total	1,21,67,500.00	1,21,67,500.00

Note - 5 : DEFERRED TAX ASSETS / (LIABILITIES)

Temporary Difference
Opening balance
DTA/DTL for the period
Deferred Tax Assets
Less : Deferred Tax Liabilities

	1,34,853.00	1,58,654.00
	(20,229.00)	(23,801.00)
	-	-
	(20,229.00)	(23,801.00)
Total	1,14,624.00	1,34,853.00

Net Deferred Tax Assets / (Liabilities)
Movement of deferred tax asset / liabilities :-
Continue to.. Notes No-5

Note - 6 : OTHER ASSETS

(A) Non-Current

- (a) Sales Tax / Service Tax (Paid under protest)
(b) GST Receivable / Paid in advance
(c) ESI Refundable

	-	-
	-	-
	-	-
Total	-	-

(B) Current

- (a) Accrued Interest
(b) Prepaid Expenses & Other Current Assets
(c) Other Advances
(d) Security deposits Unsecured, considered good
(e) Surplus in defined benefit plan (Gratuity)
(f) GST Receivable

	5,50,000.00	5,50,000.00
	-	-
	6,32,000.00	6,32,000.00
	-	-
Total	11,82,000.00	11,82,000.00



Note - 7 : INVENTORIES

(a) Inventories

(i) Stores & Spares (Valued at Cost)

Less : Provision

	As at 31st March, 2025	As at 31st March, 2024
	-	-
	-	-
Total	-	-

Note - 8 : CASH AND CASH EQUIVALENTS

Cash on hand

Balances with Banks

Bank Deposits with maturity of three months or less

	5,13,406.00	5,25,725.00
	34,874.00	34,874.00
	-	-
Total	5,48,280.00	5,60,599.00

Note - 9 : BANK BALANCE OTHER THAN ABOVE.

Bank Deposits with maturity of more than 3 months up to 12 months

Total	-	-
--------------	----------	----------

Note - 10 : CURRENT TAX ASSETS (NET)

(a) TDS Receivable

(b) Advance Tax

Less: Current Tax Liability

(a) Provision For Tax

	48,000.00	48,000.00
	-	-
	48,000.00	48,000.00
Total	48,000.00	48,000.00

Note - 11 : SHARE CAPITAL

Authorised

2,50,00,000 Equity Shares (Previous year : 2,50,00,000 Equity Shares) of

Issued, Subscribed & Paid up

2,39,45,200 Equity Shares (Previous year : 2,39,45,200 Equity Shares) of

Share Holders holding more than 5% of shares

	25,00,00,000.00	25,00,00,000.00
	23,94,52,000.00	23,94,52,000.00
Total	23,94,52,000.00	23,94,52,000.00



	As at 31st March, 2025	As at 31st March, 2024
(a) Reconciliation of number of shares outstanding at the beginning and end of the year		
Shares outstanding at the beginning of the year	2,39,45,200	2,39,45,200
Add : Share Capital Issued during the year	-	-
Less : Shares Buy Back during the year	-	-
Shares outstanding at the end of the year	2,39,45,200	2,39,45,200

(b) Details of shares held by each shareholder holding more than 5% Shares:

Share Holder's Name	Nos of Shares as on 31st March 2025	% as on 31st March, 2025	Nos of Shares as on 31st March 2024	% as on 31st March, 2024
Equity Shares:				
DRONA DISTRIBUTORS PRIVATE LIMITED	1198750	5.006	1198750	5.006
DUNHIL HEALTHCARE PRIVATE LIMITED	5000000	20.881	5000000	20.881
Total	61,98,750	26	61,98,750	26

Note - 12 : OTHER EQUITY

Reserves and Surplus

Retained Earnings:

Opening Balance as per last balance sheet

(22,88,07,868.00) (22,85,28,950.00)

Add: Profit/(Loss) for the current year

(6,61,990.00) (2,78,918.00)

Dividend for previous year

- -

Earlier Year Adjustment

Closing Balance

Total (a) (22,94,69,858.00) (22,88,07,868.00)

Other Comprehensive Income

Re-measurement of the net defined benefit plans

Total (b) - -

Total (a+b) (22,94,69,858.00) (22,88,07,868.00)

Note - 13 : BORROWINGS

(A) Non-Current

(B) Current Liabilities

Total - -

5,75,000.00 5,75,000.00

Total 5,75,000.00 5,75,000.00

Note - 13.1 : LEASE LIABILITY:

(A) Non-Current

(B) Current Liabilities

Total - -



	As at 31st March, 2025	As at 31st March, 2024
Total	-	-

Note - 14 : OTHER FINANCIAL LIABILITIES

(A) Non-Current liabilities
Performance Security Deductions

Total - -

(B) Current
Unpaid dividend

Total - -

Note - 15 : PROVISIONS

(A) Non-Current
Gratuity (net)
Leave Encashment (net)
Post Retirement Benefit

Total - -

(B) Current
Outstanding Expenses
Provision for Projects Expenditure
Post Retirement Benefit

Total - -

Note - 16 : TRADE PAYABLE

Due to Micro and Small enterprises
Others
Due to Other than Micro and Small enterprises

Total - -

Note - 17 : OTHER CURRENT LIABILITIES

(i) Revenue received in advance

(ii) Other Liabilities

(1) Creditors for expenses
(2) Payable for employee benefits
(2) Audit Fees Payable
(2) Suspenses -Payment
(3) Filing Fees Payable
(4) KOTAK CR CARD
(5) Statutory Dues

32,63,262.00 26,63,820.19
- -
2,40,000.00 2,10,000.00

Total 35,03,262.00 28,73,820.00



Note - 18 : REVENUE FROM OPERATIONS
a) Sale of Services - Value of work executed
b) Other Operating Revenues

	For the Year ended 31st March, 2025	For the Year ended 31st March, 2024
	2,48,711.00	3,42,660.00
Total	2,48,711.00	3,42,660.00

Note - 19 : OTHER INCOME
Income from Interest
Income from Let-out Property
Profit on Sale of Fixed Assets
Income Tax Refund
Sundry Creditors & Liab. Written Off A/c
Other Income
(i) Sale of Tender Papers
(ii) Misc. Income

Total _____

Note - 20 : Purchases of stock-in-trade
Purchase of traded goods

Total _____

Note - 21 : EMPLOYEE BENEFITS EXPENSES
Salaries & Wages
Contribution to Provident & Other Funds
Staff Welfare

Total _____

Note - 22 : FINANCE COST
Interest on CAR Loan
Other Finance Cost

Total _____

Note - 23 : DEPRECIATION AND AMORTIZATION EXPENSES
Depreciation on -
Property, plant and equipment
Right-of-use asset
Investment property
Amortization of intangible assets

Total _____



Note - 24 : OTHER EXPENSES

Freight and forwarding	88,500.00	88,500.00
Annual Issuer Fee	1,00,546.00	1,11,195.00
Annual Custodian Fees	29,500.00	29,500.00
Listing fees		
Power & Fuel Charges		
Business promotion		
Repairs & Maintenance		
MEMBERSHIP FEE		
RTA FEES	42,480.00	42,480.00
Commission		
Travelling and conveyance		
Rent including lease rentals		
Insurance		
Rates and taxes		
IPO Expenses		
Printing and stationery		
Donations and contributions		
Legal and professional		
Telephone Charges		
Filing Fees		
Payments to auditors (net of service tax input credit, where applicable):		
As auditors		
For statutory audit	30,000.00	30,000.00
For taxation matters		
For others		
Preliminary Expenses Written off		
Provisions		
Interest on Annual Issuer Fees	3,30,746.39	
Interest on Listing Fees	7,670.00	
Interest on TDS		
boarding & lodging		
Miscellaneous expenses		
Sundry Assets Written Off A/c		
Provision for Doubtful debt		
CR CARD CHARGES		

Total	6,29,442.00	3,01,675.00
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Note - 25 : INCOME TAXES

25.01 Income tax recognised in profit and loss:

Current tax	(20,229.00)	(23,801.00)
Deferred tax	-	-
Earlier year tax	-	-
Total	(20,229.00)	(23,801.00)

25.02 Income tax recognised in other comprehensive income:

Current tax	-	-
Deferred tax	-	-
Total	-	-



2024-25	Gross Block				Drepreciation				Net Block		Residual Value
Description	Deemed Cost / Cost as on 01.04.2024	Additions / Adjustments	Disposals / Adjustments	Deemed Cost / Cost as on 31.03.2025	Opening accumulated depreciation as on 01.04.2024	Depreciation charged during the year	Disposals / Adjustments	Closing accumulated depreciation as on 31.03.2025	Closing net carrying amount as on 31.03.2025	Closing net carrying amount as on 31.03.2024	Residual Value @ 5% of Acquisition Cost
Vehicle	21,76,598.00	-	-	21,76,598.00	21,76,598.00	-	-	21,76,598.00	-	-	9,928.00
Office Equipment	1,98,550.00	-	-	1,98,550.00	1,98,550.00	-	-	1,98,550.00	-	-	11,288.00
Computer	2,25,365.00	-	-	2,25,365.00	2,25,365.00	-	-	2,25,365.00	-	-	21,196.00
Total	26,00,513.00	-	-	26,00,513.00	26,00,513.00	-	-	26,00,513.00	-	-	



Notes to Financial Statements for the year ended 31st March 2025

NOTE NO: 25

(Annexed to and forming part of the Financial Statement for the year ended 31st March 2025)

1.0 Corporate Information

NEWEVER TRADE WINGS LTD (CIN: L74999WB2012PLC181106) (the Company) was incorporated as private limited company under the provisions of Companies Act, 1956 on April 27, 2012 as Newever Infrahomes Private Limited. Later on it was converted to public limited company on June 07, 2012 as Newever Infrahomes Limited. During the financial year 2013-14, the name of the company has been changed /altered from Newever Infrahomes Ltd. to Newever Trade Wings Limited and went for listing on 17th October, 2013 in Bombay Stock Exchange, SME Platform having Scrip Code 536644 its ISIN NO. is INE596O01010. The Company is presently engaged in the business of trading in Iron & Steel and other Related Commodities. The Registered Office of the Company is situated at: 238B, A.J.C. Bose Road, Unit 4B, Fourth Floor, Kolkata - 700020, West Bengal, India.

2.0 Basis of Preparation

2.1 Statement of Compliance

The financial statements of the Company have been prepared on accrual basis of accounting in accordance with the Indian Accounting Standards (Ind AS) as prescribed under Section 133 of Companies Act, 2013. (the Act), as notified under the Companies (Indian Accounting Standards) Rules, 2015 (as amended) and Companies (Indian Accounting Standards) amendment Rules, 2016 and other accounting principles generally accepted in India. The Company has uniformly applied the accounting policies during the periods presented in these financial statements.

2.2 Basis of Measurement

The financial statements are prepared on a historical cost basis except for the following assets and liabilities which have been measured at fair value:

- Certain financial assets and liabilities which are classified at fair value through profit and loss or fair value through other comprehensive income.



Notes to Financial Statements for the year ended 31st March 2025

- Defined benefit plans and plan assets.
- Contingent consideration.

The financial statements have been prepared on accrual and going concern basis.

2.3 Functional and Presentation Currency:

The Financial Statements have been presented in Indian Rupee (₹), which is the Company's functional currency. All financial information presented in Rupees in Lakh have been rounded off to the nearest two decimal places unless otherwise stated.

Transactions in Foreign currencies are recorded at the exchange rates prevailing on the date of transaction.

Foreign currency monetary assets and liabilities such as Receivables, Payables, Loans etc. are translated at year end exchange rates.

Exchange differences arising on settlement of transactions and translation of monetary items are recognized as income or expense in the year in which they arise.

2.4 Classification of Assets and Liabilities into Current/Non-Current

The Company has ascertained its operating cycle as twelve months for the purpose of Current/Non-Current classification of its Assets and Liabilities.

For the purpose of Balance Sheet, an asset is classified as current if:

- i) It is expected to be realized, or is intended to be sold or consumed, in the normal operating cycle; or
- ii) It is held primarily for the purpose of trading; or
- iii) It is expected to realise the asset within twelve months after the reporting period; or
- iv) The asset is a cash or cash equivalent unless it is restricted from being exchanged or used to settle a liability for at least twelve months after the reporting period. All other assets are classified as non-current.

Similarly, a liability is classified as current if:

- i) It is expected to be settled in the normal operating cycle; or



Notes to Financial Statements for the year ended 31st March 2025

- ii) It is held primarily for the purpose of trading; or
- iii) It is due to be settled within twelve months after the reporting period; or
- iv) The Company does not have an unconditional right to defer the settlement of the liability for at least twelve months after the reporting period. Terms of a liability that could result in its settlement by the issue of equity instruments at the option of the counterparty does not affect this classification.

All other liabilities are classified as non-current.

2.5 Use of Estimates and Management Judgement

The preparation of the financial statements in conformity with Ind AS requires the Management to make estimates, judgments and assumptions. These estimates, judgments and assumptions affect the application of accounting policies and the reported amounts of assets and liabilities, the disclosures of contingent assets and liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. The Management believes that the estimates used in preparation of the financial statements are prudent and reasonable. Future results could differ due to these estimates and the differences between the actual results and the estimates are recognized in the periods in which the results are known/ materialized.

The Company uses the following critical accounting estimates in preparation of its financial statements:

a. Useful lives of property, plant and equipment

The Company reviews the useful life of property, plant and equipment at the end of each reporting period. This reassessment may result in change in depreciation expense in future periods.

b. Provision for income tax and deferred tax assets



Notes to Financial Statements for the year ended 31st March 2025

The Company uses estimates and judgments based on the relevant rulings which is exercised while determining the provision for income tax. A deferred tax asset is recognized to the extent that it is probable that future taxable profit will be available against which the deductible temporary differences and tax losses can be utilised. Accordingly, the Company exercises its judgment to reassess the carrying amount of deferred tax assets at the end of each reporting period.

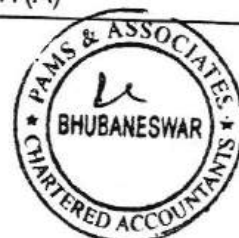
c. Provisions and contingent liabilities

A provision is recognised when the Company has a present obligation as a result of past events and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. If effect of the time value of money is material, provisions are discounted using an appropriate discount rate that reflects, when appropriate, the risks specific to the liability. When discounting is used, the increase in the provision due to the passage of time is recognised as a finance cost.

Contingent liabilities are disclosed in the Notes to the Financial Statements.
Contingent liabilities are disclosed for:

- i) Possible obligations which will be confirmed only by future events not wholly within the control of the Company, or
- ii) Present obligations arising from past events where it is not probable that an outflow of resources will be required to settle the obligation or a reliable estimate of the amount of the obligation cannot be made.
- iii) Details of dues of Income Tax, Sales Tax, Service Tax, Excise Duty and Value Added Tax which have not been deposited as at March 31, 2028 on account of dispute are given below

Name of the Statute	Dispute (in brief)	Demand Amount (Rs.)	Forum where dispute is pending
Processing fees for revocation of suspension	Processing fees for revocation of suspension	29,500	Bombay Stock Exchange (BSE)
Reinstatement fees	Reinstatement fees	1,77,000	Bombay Stock Exchange (BSE)
SEBI SOP fines	SEBI SOP fines	43,26,833	Bombay Stock Exchange (BSE)
Income Tax		1,79,45,100	CIT(A)



Notes to Financial Statements for the year ended 31st March 2025

d. Employee benefits

The accounting of employee benefit plans in the nature of defined benefit requires the Company to use assumptions. These assumptions have been explained under employee benefit note.

e. Leases

The Company evaluates if an arrangement qualifies to be a lease as per the requirements of Ind AS 116. Identification of a lease requires significant judgment. The Company uses significant judgement in assessing the lease term (including anticipated renewals) and the applicable discount rate. The Company determines the lease term as the non-cancelable period of a lease, together with both periods covered by an option to extend the lease if the Company is reasonably certain to exercise that option; and periods covered by an option to terminate the lease, if the Company is reasonably certain not to exercise that option. In assessing whether the Company is reasonably certain to exercise an option to extend a lease, or not to exercise an option to terminate a lease, it considers all relevant facts and circumstances that create an economic incentive for the company to exercise the option to extend the lease, or not to exercise the option to terminate the lease. The Company revises the lease term if there is a change in the non-cancellable period of lease.

3.0 Material Accounting Policy Information

A summary of the material accounting policies applied in the preparation of the financial statements is given below. These accounting policies have been applied consistently to all the periods presented in the financial statements.

3.1 Property, Plant and Equipment (PPE):

3.1.1 Recognition and Measurement-Tangible Assets

Property, Plant and Equipment held for use in the production and/or supply of goods or services, or for administrative purposes, are stated in the balance sheet at cost,



Notes to Financial Statements for the year ended 31st March 2025

less any subsequent accumulated depreciation and impairment losses. The initial cost at cash price equivalent of property, plant and equipment acquired comprises its purchase price, including import duties and non-refundable purchase taxes, and directly attributable costs of bringing the assets to its working condition and location and present value of any obligatory decommissioning costs for its intended use. Plant and machinery also include assets held under finance lease.

In case of self-constructed assets, cost includes the costs of all materials used in construction, direct labour, allocation of overheads, directly attributable borrowing costs including trial run expenses (net of revenue).

Material items such as spare parts, stand-by equipment and service equipment are classified as PPE when they meet the definition of PPE as specified in Ind AS 16 - Property, Plant and Equipment.

Profit or loss arising on the disposal of Property, Plant and Equipment is recognized in the Statement of Profit and Loss.

3.1.2 Subsequent Cost

Subsequent expenditure is recognized as an increase in the carrying amount of the asset recognized as a separate asset, as appropriate, only when it is probable that future economic benefits derived from the cost incurred will flow to the Company and the cost of the item can be measured reliably. The carrying amount of replaced item(s) is/are derecognized.

Major repair of property, plant and equipment are recognized in the carrying amount of the item if it is probable that the future economic benefits of the costs incurred will flow to the Company. The carrying amount of the replaced item(s) is derecognized.

3.1.3 Depreciation

Depreciation on Property, Plant and Equipment is provided using Written Down Value Method on depreciable amount. Depreciation is provided based on useful life of the



Notes to Financial Statements for the year ended 31st March 2025

assets as prescribed in Schedule II to the Companies Act, 2013. The residual values, useful life and methods of depreciation of Property, Plant and Equipment are reviewed at each financial year end.

Depreciation on capital spares is provided over the useful life of the spare or remaining useful life of the mother asset, whichever is lower. Major Repairs are amortized over its periodicity of its occurrence.

3.1.4 Capital work-in-progress

Assets in the course of construction are included under capital work-in-progress and are carried at cost, less any recognized impairment loss. Such capital work-in-progress, on completion, is transferred to the appropriate category of property, plant and equipment.

3.2 Intangible Assets:

3.2.1 Recognition and Measurement

Software

Software which is not an integral part of related hardware and thus treated as intangible asset and the useful life/ Basis of amortization is considered for 5 Years.

3.3 Impairment of Non-Financial Assets

The Company reviews the carrying amount of its assets on each Balance Sheet date for the purpose of ascertaining impairment indicators if any, by considering assets of entire one Plant as Cash Generating Unit (CGU). If any such indication exists, the assets' recoverable amount is estimated as higher of the Net Selling Price and the Value in Use. An impairment loss is recognized whenever the carrying amount of an asset exceeds its recoverable amount. Where an impairment loss subsequently reverses, the carrying amount of the asset (or cash-generating unit) is increased to the revised estimate of its recoverable amount, so that the increased carrying amount does not exceed the carrying amount that would have been determined had no



Notes to Financial Statements for the year ended 31st March 2025

impairment loss been recognized for the asset (or cash-generating unit) in prior years. A reversal of an impairment loss is recognized immediately in the Statement of Profit and Loss.

3.4 Borrowing Cost:

Borrowing cost include interest and other costs that the company incurs in connection with the borrowing of funds.

Borrowing costs related to a qualifying asset that necessarily takes a substantial period to get ready for its intended use is worked out on the basis of actual utilization of funds out of project specific loans and/or other borrowings to the extent identifiable with the qualifying asset and is capitalized with the cost of qualifying asset, using the effective interest method.

Investment income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalization.

All other borrowing costs are charged to statement of profit and loss.

In case of significant long-term loans, other costs incurred in connection with the borrowing of funds are amortized over the period of respective Loan.

3.5 Inventories:

Inventories are valued at lower of cost and net realizable value except scrap, which is valued at net realizable value. Net realizable value is the estimated selling price in the ordinary course of business, less estimated costs of completion and the estimated costs necessary to make the sale. The cost of inventories comprises of cost of purchase, cost of conversion and other costs incurred in bringing the inventories to their respective present location and condition.

The methods of determination of cost of various categories are as follows:

- a) Raw materials components, stores and spares, and packing materials are valued at cost .



Notes to Financial Statements for the year ended 31st March 2025

- Cost includes cost of purchase and other costs in bringing the inventories to their present location and condition. Cost is determined on weighted average cost basis.
- b) Work-in-process stock valued at cost of direct materials, labor and a proportion of manufacturing overheads based on normal operating capacity but excluding borrowing cost.
 - c) Finished goods are valued at Cost or net realizable value, whichever is lower.
 - d) Traded goods cost includes cost of purchase and other costs incurred in bringing the inventories to their present location and condition

3.6 Employee Benefits

a) Short term employee benefits

All employee benefits payable wholly within twelve months of rendering the service are classified as short-term employee benefits. Benefits such as salaries, wages and bonus, etc., are recognized in the Statement of Profit and Loss in the period in which the employee renders the related service.

b) Post-employment benefit

i. Defined contribution plan

Retirement benefit in the form of Provident Fund is a defined contribution scheme and the contributions are charged to the Statement of Profit and Loss of the year in which the contributions to the fund are due.

ii. Defined benefit plan

The Company's gratuity scheme is a defined benefit plan. In accordance with the Payment of Gratuity Act, 1972, the plan provides for lump sum payments to vested employees on retirement, death while in service or on termination of employment of an amount equivalent to 15 days basic salary for each completed year of service. Vesting occurs upon completion of Five years of service. The present value of the



Notes to Financial Statements for the year ended 31st March 2025

obligation under such defined benefit plan is determined based on actuarial valuation carried out by an independent actuary, using the Projected Unit Credit Method as per Ind AS 19, which recognizes each period of service as giving rise to additional unit of employee benefit entitlement and measures each unit separately to build up the final obligation. The obligation is measured at the present value of the estimated future cash flows using projected unit credit method. The discount rates used for determining the present value of the obligation under defined benefit plans, is based on the market yields of Government securities as at the balance sheet date. Actuarial gains and losses are recognized immediately in the Statement of Profit and Loss or Other Comprehensive Income of the year.

Remeasurement, comprising of actuarial gains and losses, the effect of the changes to the asset ceiling (if applicable) and the return on plan assets (excluding interest), is reflected in the balance sheet with a charge or credit recognized in other comprehensive income in the period in which they occur. Remeasurement recognized in other comprehensive income is reflected immediately in retained earnings and will not be reclassified to the statement of profit and loss.

iii. Other long term employee benefits

The Company allows to carry forward any leave/compensated absences beyond the calendar year subject to a maximum of 15 days and restricting the total accumulation to 60 days during the period of employment.

3.7 Foreign currencies Transactions and balances:

Transactions in foreign currency are recorded applying the exchange rate at the date of transaction. Monetary assets and liabilities denominated in foreign currency, remaining unsettled at the end of the year, are translated at the closing exchange rates prevailing on the Standalone Balance sheet.

Exchange differences arising on settlement or translation of monetary items are recognised in the Standalone Statement of Profit and Loss.



Notes to Financial Statements for the year ended 31st March 2025

3.8 Revenue Recognition

Revenues from customer contracts are considered for recognition and measurement when the contract has been approved by the parties to the contract, the parties to the contract are committed to perform their respective obligations under the contract, and the contract is legally enforceable. Revenue is recognized upon transfer of control of promised products or services to customers in an amount that reflects the consideration the Company expects to receive in exchange for those products or services. To recognize revenues, the Company applies the following five step approach as per Ind AS 115: (1) identify the contract with a customer, (2) identify the performance obligations in the contract, (3) determine the transaction price, (4) allocate the transaction price to the performance obligations in the contract, and (5) recognize revenues when a performance obligation is satisfied. When there is uncertainty as to collectability, revenue recognition is postponed until such uncertainty is resolved.

- i. Revenue is recognized to the extent it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured. Revenue from sale of goods is recognized net of rebate / discounts and other similar allowances on transfer of significant risk and rewards of ownership to the buyer.
- ii. Revenue from contracts with customers is recognised upon transfer of control of promised goods/ services to customers at an amount that reflects the consideration expected to be entitled for those goods/ services.

To recognize revenues, following five-step approach:

- Identify the contract with a customer.
 - Identify the performance obligations in the contract.
 - Determine the transaction price.
 - Allocate the transaction price to the performance obligations in the contract; and
 - Recognise revenues when a performance obligation is satisfied.
- iii. Interest income is reported on an accrual basis using the effective interest method.



Notes to Financial Statements for the year ended 31st March 2025

iv. Export incentives income

Export incentives under various schemes notified by the government are accounted for in the year of exports based on eligibility and when there is no uncertainty in receiving the same.

v. Government grants

Government grants are recognised where there is a reasonable assurance that the grant will be received, and all attached conditions will be complied with:

- When the grant relates to an expense item, it is recognised as income on a systematic basis over the periods that the related costs, for which it is intended to compensate, are expense.
- When the grant relates to an asset, it is recognised as income in the Statement of Profit and Loss in equal amounts over the expected useful life of the related asset.
- When loans or similar assistance are provided by governments or related institutions, at a below-market rate of interest, the effect of this favorable interest is treated as a government grant. The loan or assistance is initially recognised and measured at fair value, and the government grant is measured as the difference between the proceeds received and the initial carrying value of the loan. The loan is subsequently measured as per the accounting policies applicable to financial liabilities.

3.9 Leases

Company as a

Lessee

The Company assesses whether a contract contains a lease, at inception of a contract. A contract is, or contains, a lease if the contract conveys the right to control the use of an identified asset for a period in exchange for consideration. To assess whether a contract conveys the right to control the use of an identified asset, the Company assesses whether: (i) the contract involves the use of an identified asset (ii)



Notes to Financial Statements for the year ended 31st March 2025

the Company has substantially all the economic benefits from use of the asset through the period of the lease and (iii) the Company has the right to direct the use of the asset.

At the date of commencement of the lease, the Company recognizes a right-of-use asset ("ROU") and a corresponding lease liability for all lease arrangements in which it is a lessee, except for leases with a term of twelve months or less (short-term leases) and lowvalue leases. For these short-term and low value leases, the Company recognizes the

lease payments as an operating expense on a straight-line basis over the term of the lease.

As a lessee, the Company determines the lease term as the non-cancellable period of a lease adjusted with any option to extend or terminate the lease, if the use of such option is reasonably certain. The Company makes an assessment on the expected lease term on a lease-by-lease basis and thereby assesses whether it is reasonably certain that any options to extend or terminate the contract will be exercised. In evaluating the lease term, the Company considers factors such as any significant leasehold improvements undertaken over the lease term, costs relating to the termination of the lease and the importance of the underlying asset to Company's operations, taking into account the location of the underlying asset and the availability of suitable alternatives. The lease term in future periods is reassessed to ensure that the lease term reflects the current economic circumstances.

Certain lease arrangements include the options to extend or terminate the lease before the end of the lease term. ROU assets and lease liabilities includes these options when it is reasonably certain that they will be exercised.

The right-of-use assets are initially recognized at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or prior to the commencement date of the lease plus any initial direct costs less any lease



Notes to Financial Statements for the year ended 31st March 2025

incentives. They are subsequently measured at cost less accumulated depreciation and impairment losses.

Right-of-use assets are depreciated from the commencement date on a straight-line basis over the shorter of the lease term and useful life of the underlying asset. Right of use assets are evaluated for recoverability whenever events or changes in circumstances indicate that their carrying amounts may not be recoverable. For the purpose of impairment testing, the recoverable amount (i.e. the higher of the fair value less cost to sell and the value-in-use) is determined on an individual asset basis unless the asset does not generate cash flows that are largely independent of those from other assets. In such cases, the recoverable amount is determined for the Cash Generating Unit (CGU) to which the asset belongs.

The lease liability is initially measured at amortized cost at the present value of the future lease payments. The lease payments are discounted using the interest rate implicit in the lease or, if not readily determinable, using the incremental borrowing rates in the country of domicile of these leases. Lease liabilities are remeasured with a corresponding adjustment to the related right of use asset if the Company changes its assessment of whether it will exercise an extension or a termination option.

Lease liability and ROU asset have been separately presented in the Balance Sheet and lease payments have been classified as financing cash flows.

Company as a

Lessor

Finance leases

Leases which effectively transfer to the lessee substantially all the risks and benefits incidental to ownership of the leased item are classified and accounted for as finance lease. Lease rental receipts are apportioned between the finance income and capital repayment based on the implicit rate of return. Contingent rents are recognized as revenue in the period in which they are earned.



Notes to Financial Statements for the year ended 31st March 2025

Operating leases

Leases in which the Company does not transfer substantially all the risks and rewards of ownership of an asset are classified as operating leases. The respective leased assets are included in the balance sheet based on their nature. Rental income is recognized on straight-line basis over the lease term except where scheduled increase in rent compensates the Company with expected inflationary costs.

3.10 Provision, Contingent Liabilities and Contingent Assets

A Provision is recognized when the Company has present obligation because of a past event and it is probable that an outflow of resources will be required to settle the obligation in respect of which a reliable estimate can be made. Provisions are discounted to their present value, where the time value of money is material.

When some or all the economic benefits required to settle a provision are expected to be recovered from a third party, the receivable is recognized as a separate asset if it is virtually certain that reimbursement will be received, and the amount of the receivable can be measured reliably.

Contingent liability is a possible obligation arising from past events and the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the Company or a present obligation that arises from past events but is not recognized because it is not possible that an outflow of resources embodying economic benefit will be required to settle the obligations or reliable estimate of the amount of the obligations cannot be made. The Company discloses the existence of contingent liabilities in Other Notes to Financial Statements.

In cases where the possible outflow of economic resources as a result of present obligation is considered improbable or remote, no Provision is recognized or disclosure is made.

Contingent Assets



Notes to Financial Statements for the year ended 31st March 2025

Contingent assets usually arise from unplanned or other unexpected events that give rise to the possibility of an inflow of economic benefits. Contingent Assets are not recognized though are disclosed, where an inflow of economic benefits is probable.

3.11 Income Taxes:

Tax expense recognized in statement of profit and loss comprises the sum of deferred tax and current tax not recognized in Other Comprehensive Income (OCI) or directly in equity.

Current income tax is measured at the amount expected to be paid to the tax authorities in accordance with the Indian Income-tax Act. Current income tax relating to items recognized outside statement of profit and loss is recognized either in OCI or in equity.

Deferred income taxes are calculated using the liability method. Deferred tax liabilities are generally recognized in full for all taxable temporary differences. Deferred tax assets are recognized to the extent that it is probable that the underlying tax loss, unused tax credits (MAT Credit entitlement) or deductible temporary difference will be utilized against future taxable income. Unrecognized deferred tax assets are reassessed at each reporting date and are recognized to the extent that it has become probable that future taxable profits will allow the deferred tax asset to be recovered.

Deferred tax assets and liabilities are measured at the tax rates that are expected to apply in the year when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted at the reporting date. Deferred tax relating to items recognized outside statement of profit and loss is recognized either in OCI or in equity.

3.12 Cash & Cash Equivalents

Cash and cash equivalents comprise cash on hand and demand deposits, together with other short-term highly liquid investments (original maturity less than 12 months)



Notes to Financial Statements for the year ended 31st March 2025

that are readily convertible into known amount of cash and are subject to an insignificant risk of changes in value.

3.13 Equity and Reserves

Share Capital represents the nominal value of shares that have been issued. Securities premium includes any premium received on issue of Share Capital. Other components of equity include the following:

- Re-measurement of defined benefit liability comprises the actuarial gain or loss from changes in demographic and financial assumptions and return on plan assets.
- Other transactions recorded directly in Other Comprehensive Income.
- Retained earnings include all current and prior period retained profits.

3.14 Financial Instruments

Recognition, initial measurement, and de-recognition

Financial assets and financial liabilities are recognized and are measured initially at fair value adjusted by transactions costs, except for those financial assets which are classified at Fair Value through Profit & Loss (FVTPL) at inception.

Financial assets are derecognized when the contractual rights to the cash flows from the financial asset expire, or when the financial asset and all substantial risks and rewards are transferred. A financial liability is derecognized when it is extinguished, discharged, cancelled, or expires.

Classification and subsequent measurement of financial assets

For the purpose of subsequent measurement, financial assets are classified into the following categories upon initial recognition:

- amortized cost
- financial assets at fair value through profit or loss (FVTPL)
- financial assets at fair value through other comprehensive income (FVOCI)



Notes to Financial Statements for the year ended 31st March 2025

All financial assets except for those at FVTPL are subject to review for impairment atleast at each reporting date.

Amortised cost

A financial asset is measured at amortised cost using effective interest rates if both of the following conditions are met:

- a) The financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and
- b) The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding.

The Company's cash and cash equivalents, trade and most other receivables fall into this category of financial instruments.

Financial assets at FVTPL

Financial assets at FVTPL include financial assets that are either do not meet the criteria for amortized cost classification or that are equity instruments held for trading or that meet certain conditions and are designated at FVTPL upon initial recognition. All derivative financial instruments also fall into this category. Assets in this category are measured at fair value with gains or losses recognized in profit or loss. The fair values of financial assets in this category are determined by reference to active market transactions or using a valuation technique where no active market exists.

Financial assets at FVOCI

FVOCI financial assets are either debt instruments that are managed under hold to collect and sell business model or are non-trading equity instruments that are irrevocable designated to this category at inception.



Notes to Financial Statements for the year ended 31st March 2025

FVOCI financial assets are measured at fair value. Gains and losses are recognized in other comprehensive income, except for interest and dividend income, impairment losses and foreign exchange differences on monetary assets, which are recognized in statement of profit or loss.

Classification and subsequent measurement of financial liabilities

Financial liabilities are measured subsequently at amortized cost using the effective interest method, except for financial liabilities held for trading or designated at FVTPL, that are carried subsequently at fair value with gains or losses recognized in profit and loss.

All derivative financial instruments are accounted for at FVTPL.

3.15 Earnings Per Share

Basic earnings per share are calculated by dividing the net profit or loss for the year attributable to equity shareholders by the weighted average number of equity shares outstanding during the year.

For the purpose of calculating diluted earnings per share, the net profit or loss for the year attributable to equity shareholders and the weighted average number of shares outstanding during the year are adjusted for the effects of all dilutive potential equity shares.

3.16 Cash Flow Statement:

Cash flows are reported using the indirect method, whereby net profit (loss) before tax is adjusted for the effects of transactions of a non-cash nature, any deferrals or accruals of past or future operating cash receipts or payments and items of income or expenses associated with investing or financing cash flows. The cash flows from operating, investing, and financing activities of the Company are segregated.

4.0 Additional Notes to Accounts

4.1 Auditors' Remuneration (excluding GST)



Notes to Financial Statements for the year ended 31st March 2025

Particulars	(Amount Lakh Rupees)	
	Current year ended 31st March 2025	Previous year ended 31st March 2024
Statutory Audit Fees	0.30	0.30
Other Professional Fees		
Total	0.30	0.30

4.2 Related Party Disclosures As per IND AS 24**A. Name of the Related Parties****1. Enterprise having significant influence:**

Vikrant Kayan & Ors (HUF)
 AGNES PACKAGING Private Limited
 DUNHIL TRADERS Private Limited
 V.S HI RISE Private Limited
 Job Track Vyapaar Private Limited
 Dunhil Heath Care Private Limited
 Aakooti Barter Private Limited
 Gleam Fashions Private Limited
 Devtasha Enterprise
 Alfred Beverages Private Limited

2. Directors and Key Managerial Personnel:

Mr. Vikrant Kayan : Director
 Mr. Debjit Banerjee : Additional Director

3. Independent & Non-Executive Director

Mr. Vikash Dubey : Independent Director
 Mr. Bhaskar Paul : Independent Director
 Mr. Girija Banerjee : Independent Director



Notes to Financial Statements for the year ended 31st March 2025

B. Transactions with Related Parties

Particulars	Transaction		Closing Balance	
	F.Y 2024-25	F.Y 2023-24	31-03-2025	31-03-2024
i) Advance Received				
Alfred Beverages Pvt. Ltd	-	-	-	-
Vikrant Kayan			-	-
ii) Loan and Advance				
Alfred Beverages Pvt. Ltd.			88.78	88.78
Dunhil Healthcare Pvt Ltd.			5.75	5.75
iii) Receiving of Services				
V.S. Hi- Rise Pvt. Ltd.			8.45	8.45
DEVTASHA ENTERPRISES			5.50	5.50

4.3 Earnings Per Share (EPS)

Particulars		Current Year 2024-25	Previous Year 2023-24
Net Profit After Tax (PAT)	Lakh Rs.	(6.62)	(2.79)
Net Profit After Tax for Equity Shares (PAT)	Lakh Rs.	(6.62)	(2.79)
Earnings Per Share (EPS) (Equity Shares @ Rs10/- each)			
Basic	Rs.	(0.03)	(0.01)
Diluted	Rs.	(0.03)	(0.01)
Number of shares used in computing earnings per share			
Basic	No.	2,39,45,200	2,39,45,200
Diluted	No.	2,39,45,200	2,39,45,200

4.4 Consumption of Imported and Indigenous raw materials and stores & spares parts and percentage of each to total consumption.

Particulars	Current Year 2024-25		Previous Year 2023-24	
	%	Value (Mn Rs.)	%	Value (Mn Rs.)



Notes to Financial Statements for the year ended 31st March 2025

Raw materials & Intermediates Consumed				
Imported				
Indigenous				
Total				
Imported	-	-		-
Indigenous				
Total				

4.5 Capital Commitments:

(Rupees in Lakh)

Particulars	As at 31.03.2025	As at 31.03.2024
Estimated Amount of contract remaining to be executed on capital account and not provided for (net of advances):	-	-
Property, Plant and Equipment	-	-



Notes to Financial Statements for the year ended 31st March 2025

4.6 Additional Disclosures in compliance of amendment in Companies Act

Trade Payable Ageing:

As at 31st March 2025

Particulars	(Rupees in Lakh) Outstanding for following periods from due date of payment				
	Less than 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) MSME	-	-	-	-	-
(ii) Others	-	-	-	-	-
(iii) Disputed dues MSME	-	-	-	-	-
(iv) Disputed dues - Others	-	-	-	-	-

As at 31st March 2024

Particulars	(Rupees in Lakh) Outstanding for following periods from due date of payment				
	Less than 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) MSME	-	-	-	-	-
(ii) Others	-	-	-	-	-
(iii) Disputed dues - MSME	-	-	-	-	-
(iv) Disputed dues - Others	-	-	-	-	-

Trade Receivable Ageing:

As at 31st March 2025

Particulars	(Rupees in Lakh) Outstanding for following periods from due date of payment					
	Less than 6 months	6 months - 1 year	1-2 years	2-3 years	More than 3 years	Total
(i) Undisputed Trade receivables considered good	-	-	-	-	-	-
(ii) Undisputed Trade Receivables	-	-	-	-	-	-



Notes to Financial Statements for the year ended 31st March 2025

As at 31st March 2024

CWIP	Amount in CWIP for a period of				Total
	Less than 1 year	1-2 years	2-3 Years	More than 3 years	
Projects in progress	-	-	-	-	-
Projects temporarily suspended	-	-	-	-	-

Capital Work in Progress, whose completion is overdue or has exceeded its cost compared to its original plan, CWIP completion schedule:

As at 31st March 2025

CWIP	Amount in CWIP for a period of				Total
	Less than 1 year	1-2 years	2-3 Years	More than 3 years	
Project 1					

As at 31st March 2024

CWIP	Amount in CWIP for a period of				Total
	Less than 1 year	1-2 years	2-3 Year s	More years than 3	
Project 1	-	-	-	-	-

4.7 Accounting Ratios:

S. No.	Particulars	Current Year 2024-25	Previous Year 2023-24
a)	Current Ratio	3.42	4.05



Notes to Financial Statements for the year ended 31st March 2025

b)	Debt-Equity Ratio	0.41	0.32
c)	Debt Service Coverage Ratio	-	-
d)	Return on Equity Ratio	-6.42%	-2.59%
e)	Inventory turnover ratio	-	-
f)	Trade Receivables turnover ratio	-	-
g)	Trade payables turnover ratio	-	-
h)	Net capital turnover ratio	0.02	0.03
i)	Net profit ratio	-266.17%	-81.40%
j)	Return on Capital employed	-6.43%	-2.40%
k)	Return on investment	-6.42%	-2.59%

- 4.8 Previous year's figures have been regrouped/ reclassified wherever necessary.
- 4.9 The Company does not have any Benami property, where any proceeding has been initiated or pending against the Company for holding any Benami property under the Benami Transactions (Prohibition) Act, 1988 and rules made thereunder. (Certificate to be Obtained)
- 4.10 The Company is in compliance with the number of layers prescribed under clause (87) of section 2 of the Companies Act, 2013 read with the Companies (Restriction on number of Layers) Rules, 2017 (as amended).
- 4.11 The Company has not been declared as willful defaulter by any bank or financial institution or other lender.
- 4.12 The Company does not have any transactions with companies struck off under Section 248 of the Companies Act, 2013 (as amended) or Section 560 of the Companies Act, 1956
- 4.13 The Company has not traded or invested in Crypto Currency or Virtual during the current and previous financial year
- 4.14 The Company has not received any fund from any person(s) or entity(ies), including foreign entities (Funding Party) with the understanding (whether recorded in writing or otherwise) that the Company shall:



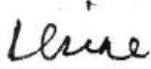
Notes to Financial Statements for the year ended 31st March 2025

(a) 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

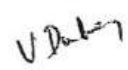
(b) provide any guarantee, security or the like to or on behalf of the Ultimate Beneficiaries.

4.15 The balances of loans and advances, trade receivables, and trade payables are subject to confirmation. In most of the cases, the confirmation are yet to be received

In terms of our Report of even date.


CA Manoranjan Mishra
Partner
Membership Number: 063698


VIKRANT KAYAN
DIN: 00761044


VIKASH DUBEY
DIN: 06548810

UDIN: 25063698BMJA5Q4982

Place: Bhubaneswar
Date:

