

SWATI PROJECTS LIMITED

CIN: L65993WB1983PLC036332

168-B, JAMUNALAL BAJAJ STREET, KOLKATA-700007

E mail: swatiprojectsltd@gmail.com

Phone: 033-22385102/+91 9830077000

Website: www.swatiprojects.com

To
The Listing Department
The Calcutta Stock Exchange Limited
7 Lyons Range
Kolkata- 700001

15th April, 2022

Dear Sir / Madam,

Sub.: **Submission of documents**

This is to intimate you that we are submitting documents for M/s. Swati Projects Limited as per SEBI (LODR) Regulations, 2015 as follows:

1. **Regulation 27(2) – Corporate Governance**
For the quarter and year ended 31.03.2022

This is for your intimation and record.

Thanking You.

Yours faithfully,

For Swati Project Limited

Shashi Kumar
Chief Financial Officer



General information about company

Scrip code	029458
NSE Symbol	
MSEI Symbol	SWATI
ISIN	INE210F01016
Name of the entity	Swati Projects Limited
Date of start of financial year	01-04-2021
Date of end of financial year	31-03-2022
Reporting Quarter	Yearly
Date of Report	31-03-2022
Risk management committee	Not Applicable
Market Capitalisation as per immediate previous Financial Year	Any other

For Swati Project Limited

Shashi Kumar
Chief Financial Officer



Annexure I

Annexure I to be submitted by listed entity on quarterly basis

I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Whether the listed entity has a Regular Chairperson

Yes

Whether Chairperson is related to MD or CEO

Yes

Sr	Title (Mr / Ms)	Name of the Director	PAN	DIN	Category 1 of directors	Category 2 of directors	Category 3 of directors	Date of Birth	Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations]	Date of passing special resolution	Initial Date of appointment	Date of Re-appointment	Date of cessation	Tenure of director (in months)	No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations)	No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations)	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations)	No of post of Chairperson in Audit/ Stakeholder Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations)	Notes for not providing PAN	Notes for not providing DIN
1	Mr	Shreegopal Daga	ADWPD3061H	00397379	Executive Director	Chairperson related to Promoter	MD	12-01-1940	NA		01-08-2014	01-08-2019		60	1	0	1	0		
2	Mr	Anurag Daga	ADWPD3057D	05239623	Non-Executive - Non Independent Director	Not Applicable		30-04-1972	NA		25-06-2012	30-09-2021			1	0	0	0		
3	Mrs	Vatsala Daga	ADPPM4670G	08820036	Non-Executive - Non Independent Director	Not Applicable		19-08-1976	NA		14-09-2020				1	0	0	0		
4	Mr	Shiv Mani Ojha	AAKPO9498G	08097947	Non-Executive - Independent Director	Not Applicable		20-01-1965	NA		28-03-2018			60	0	1	1	1		

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



I. Composition of Board of Directors

Disclosure of notes on composition of board of directors explanatory

Whether the listed entity has a Regular Chairperson

Sr	Title (Mr / Ms)	Name of the Director	PAN	DIN	Category 1 of directors	Category 2 of directors	Category 3 of directors	Date of Birth	Whether special resolution passed? [Refer Reg. 17(1A) of Listing Regulations]	Date of passing special resolution	Initial Date of appointment	Date of Re-appointment	Date of cessation	Tenure of director (in months)	No of Directorship in listed entities including this listed entity (Refer Regulation 17A of Listing Regulations)	No of Independent Directorship in listed entities including this listed entity (Refer Regulation 17A(1) of Listing Regulations)	Number of memberships in Audit/ Stakeholder Committee(s) including this listed entity (Refer Regulation 26(1) of Listing Regulations)	No of Chairpersons in Audit Stakehold Committee held in listed entities including this listed entity (Refer Regulation 26(1) of Listing Regulations)
5	Mr	Rishi Kapoor	AHGPK3795H	08422654	Non-Executive - Independent Director	Not Applicable		27-08-1974	NA		07-05-2019			60	0	1	1	1
6	Mr	Amit Lal	AGCPL7918C	09469579	Non-Executive - Independent Director	Not Applicable		08-08-1987	NA		15-01-2022			60	0	1	0	0

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Audit Committee Details							
Sr	DIN Number	Name of Committee members	Whether the Audit Committee has a Regular Chairperson		Date of Appointment	Date of Cessation	Remarks
			Category 1 of directors	Category 2 of directors			
1	08422654	Rishi Kapoor	Non-Executive - Independent Director	Chairperson	07-05-2019		
2	08097947	Shiv Mami Ojha	Non-Executive - Independent Director	Member	28-03-2018		
3	00397379	Shreegopal Daga	Executive Director	Member	01-04-2014		

For Swati Project Limited

Shakti Kumar

Chief Financial Officer



Nomination and remuneration committee							
Sr	DIN Number	Name of Committee members	Whether the Nomination and remuneration committee has a Regular Chairperson		Date of Appointment	Date of Cessation	Remarks
			Category 1 of directors	Category 2 of directors			
1	05239623	Anurag Daga	Non-Executive - Non Independent Director	Member	25-06-2012		
2	08097947	Shiv Mani Ojha	Non-Executive - Independent Director	Member	28-03-2018		
3	08422654	Rishi Kapoor	Non-Executive - Independent Director	Chairperson	07-05-2019		

For Swati Project Limited

Shanki Kumar

Chief Financial Officer



Stakeholders Relationship Committee

Sr	DIN Number	Name of Committee members*	Whether the Stakeholders Relationship Committee has a Regular Chairperson		Date of Appointment	Date of Cessation	Remarks
			Category 1 of directors	Category 2 of directors			
1	00397379	Shreegopal Daga	Executive Director	Member	01-08-2014		
2	08097947	Shiv Mani Ojha	Non-Executive - Independent Director	Chairperson	28-03-2018		
3	08422654	Rishi Kapoor	Non-Executive - Independent Director	Member	07-05-2019		

For Swati Project Limited

Shri. Kumar

Chief Financial Officer



Risk Management Committee							
Whether the Risk Management Committee has a Regular Chairperson							
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Corporate Social Responsibility Committee

Whether the Corporate Social Responsibility Committee has a Regular Chairperson							
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation	Remarks

For Swati Project Limited

Shari Kumar

Chief Financial Officer



Other Committee						
Sr	DIN Number	Name of Committee members	Name of other committee	Category 1 of directors	Category 2 of directors	Remarks

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Annexure I

Annexure I

III. Meeting of Board of Directors

Sr	Disclosure of notes on meeting of board of directors explanatory		Maximum gap between any two consecutive (in number of days)	Notes for not providing Date	Whether requirement of Quorum met (Yes/No)	Number of Directors present* (All directors including Independent Director)	No. of Independent Directors attending the meeting*
	Date(s) of meeting (if any) in the previous quarter	Date(s) of meeting (if any) in the current quarter					
1	11-10-2021				Yes	5	2
2	21-10-2021		9		Yes	5	2
3	08-11-2021		17		Yes	5	2
4		15-01-2022	67		Yes	5	2
5		31-01-2022	15		Yes	6	3

For Swati Project Limited

Shari Kumar

Chief Financial Officer



Annexure 1

IV. Meeting of Committees

Sr	Name of Committee	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Name of other committee	Reason for not providing date	Whether requirement of Quorum met (Yes/No)	Number of Directors present* (All directors including Independent Director)	No. of Independent Directors attending the meeting*
1	Audit Committee	08-11-2021				Yes	5	2
2	Audit Committee	31-01-2022	83			Yes	6	3
3	Nomination and remuneration committee	15-01-2022				Yes	5	2



For Swati Project Limited

Shari Amin

Chief Financial Officer

Annexure 1

V. Related Party Transactions

Sr	Subject	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
1	Whether prior approval of audit committee obtained	NA	
2	Whether shareholder approval obtained for material RPT	NA	
3	Whether details of RPT entered into pursuant to omnibus approval have been reviewed by Audit Committee	NA	

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Annexure 1

VI. Affirmations

Sr	Subject	Compliance status (Yes/No)
1	The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	Yes
2	The composition of the following committees is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee	Yes
3	The composition of the following committees is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015. b. Nomination & remuneration committee	Yes
4	The composition of the following committees is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015. c. Stakeholders relationship committee	Yes
5	The composition of the following committees is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to the top 500 listed entities)	NA
6	The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing Obligations and disclosure requirements) Regulations, 2015.	Yes
7	The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
8	This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	Yes

For Swati Project Limited

Shari Kumar

Chief Financial Officer



Annexure I

Sr	Subject	Compliance status
1	Name of signatory	Sri Shashi Kumar
2	Designation	Director

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Annexure II

Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)

I. Disclosure on website in terms of Listing Regulations

Sr Item	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.	Web address
1 Details of business	Yes		www.swatiprojects.com
2 Terms and conditions of appointment of independent directors	Yes		www.swatiprojects.com
3 Composition of various committees of board of directors	Yes		www.swatiprojects.com
4 Code of conduct of board of directors and senior management personnel	Yes		www.swatiprojects.com
5 Details of establishment of vigil mechanism/ Whistle Blower policy	Yes		www.swatiprojects.com
6 Criteria of making payments to non-executive directors	Yes		www.swatiprojects.com
7 Policy on dealing with related party transactions	Yes		www.swatiprojects.com
8 Policy for determining 'material' subsidiaries	Yes		www.swatiprojects.com
9 Details of familiarization programmes imparted to independent directors	Yes		www.swatiprojects.com

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Annexure II

Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)

I. Disclosure on website in terms of Listing Regulations

Sr	Item	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.	Web address
10	Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances	Yes		www.swatiprjects.com
11	email address for grievance redressal and other relevant details	Yes		www.swatiprjects.com
12	Financial results	Yes		www.swatiprjects.com
13	Shareholding pattern	Yes		www.swatiprjects.com
14	Details of agreements entered into with the media companies and/or their associates	NA		
15	Schedule of analyst or institutional investor meet and presentations made by the listed entity to analysts or institutional investors simultaneously with submission to stock exchange	NA		
16	New name and the old name of the listed entity	NA		
17	Advertisements as per regulation 47 (1)	Yes		www.swatiprjects.com
18	Credit rating or revision in credit rating obtained	NA		
19	Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year	Yes		www.swatiprjects.com
20	Whether company has provided information under separate section on its website as per Regulation 46(2)	Yes		www.swatiprjects.com
21	Materiality Policy as per Regulation 30	Yes		www.swatiprjects.com
22	Dividend Distribution policy as per Regulation 43A (as applicable)	NA		
23	It is certified that these contents on the website of the listed entity are correct	Yes		www.swatiprjects.com

For Swati Project Limited

Shanku Kumar

Chief Financial Officer



Annexure II

II. Annual Affirmations

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
1	Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b) & 25(6)	Yes	
2	Board composition	17(1), 17(1A) & 17(1B)	Yes	
3	Meeting of Board of directors	17(2)	Yes	
4	Quorum of Board meeting	17(2A)	Yes	
5	Review of Compliance Reports	17(3)	Yes	
6	Plans for orderly succession for appointments	17(4)	Yes	
7	Code of Conduct	17(5)	Yes	
8	Fees/compensation	17(6)	Yes	
9	Minimum Information	17(7)	Yes	
10	Compliance Certificate	17(8)	Yes	



For Swati Project Limited

Shari Kumar

Chief Financial Officer

Annexure II

II. Annual Affirmations

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
11	Risk Assessment & Management	17(9)	NA	
12	Performance Evaluation of Independent Directors	17(10)	Yes	
13	Recommendation of Board	17(11)	Yes	
14	Maximum number of Directorships	17A	Yes	
15	Composition of Audit Committee	18(1)	Yes	
16	Meeting of Audit Committee	18(2)	Yes	
17	Composition of nomination & remuneration committee	19(1) & (2)	Yes	
18	Quorum of Nomination and Remuneration Committee meeting	19(2A)	Yes	
19	Meeting of Nomination and Remuneration Committee	19(3A)	Yes	
20	Composition of Stakeholder Relationship Committee	20(1), 20(2) & 20(2A)	Yes	

For Swati Project Limited

Shan. Kumar

Chief Financial Officer



Annexure II

II. Annual Affirmations

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
21	Meeting of Stakeholders Relationship Committee	20(3A)	Yes	
22	Composition and role of risk management committee	21(1),(2),(3),(4)	NA	
23	Meeting of Risk Management Committee	21(3A)	NA	
24	Vigil Mechanism	22	Yes	
25	Policy for related party Transaction	23(1),(1A),(5),(6),(7) & (8)	Yes	
26	Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	Yes	
27	Approval for material related party transactions	23(4)	Yes	
28	Disclosure of related party transactions on consolidated basis	23(9)	Yes	
29	Composition of Board of Directors of unlisted material Subsidiary	24(1)	Yes	
30	Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	Yes	



For Swati Project Limited

Shashi Kumar

Chief Financial Officer

Annexure II

II. Annual Affirmations

Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)	If status is "No" details of non-compliance may be given here.
31	Annual Secretarial Compliance Report	24(A)	Yes	
32	Alternate Director to Independent Director	25(1)	NA	
33	Maximum Tenure	25(2)	NA	
34	Meeting of independent directors	25(3) & (4)	Yes	
35	Familiarisation of independent directors	25(7)	Yes	
36	Declaration from Independent Director	25(8) & (9)	Yes	
37	D & O Insurance for Independent Directors	25(10)	NA	
38	Memberships in Committees	26(1)	Yes	
39	Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes	
40	Disclosure of Shareholding by Non-Executive Directors	26(4)	NA	
41	Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes	
	Any other information to be provided - Add Notes			



For Swati Project Limited

Shashi Kumar

Chief Financial Officer

Annexure II

1	Name of signatory	Sri Shashi Kumar
2	Designation	Chief Financial Officer

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Annexure II

III. Affirmations

Sr	Particulars	Compliance status (Yes/No/NA)
1	The Listed Entity has approved Material Subsidiary Policy and the Corporate Governance requirements with respect to subsidiary of Listed Entity have been complied	Yes
	Any other information to be provided	

For Swati Project Limited

Shanku Kumar

Chief Financial Officer



Annexure II

1	Name of signatory	Sri Shashi Kumar
2	Designation	Chief Financial Officer

For Swati Project Limited

Shashi Kumar

Chief Financial Officer





Additional Half yearly Disclosure			
Applicability of disclosure	Applicable		
Reason for Non Applicability	Textual Information(1)		
I. Disclosure of Loans/ guarantees/comfort letters /securities etc.refer note below			
(A)Any loan or any other form of debt advanced by the listed entity directly or indirectly to			
Entity	Aggregate amount advanced during six months	Balance outstanding at the end of six months	
Promoter or any other entity controlled by them	1170000	94546255	
Promoter Group or any other entity controlled by them	0	0	
Directors (including relatives) or any other entity controlled by them	0	0	
KMPs or any other entity controlled by them	0	0	
(B) Any guarantee / comfort letter (by whatever name called) provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed By			
Entity	Type (guarantee, comfort letter etc.)	Aggregate amount of issuance during six months	Balance outstanding at the end of six months(taking into account any invocation)
Promoter or any other entity controlled by them	0	0	0
Promoter Group or any other entity controlled by them	0	0	0
Directors (including relatives) or any other entity controlled by them	0	0	0
KMPs or any other entity controlled by them	0	0	0
(C) Any security provided by the listed entity directly or indirectly, in connection with any loan(s) or any other form of debt availed by			
Entity	Type of security (cash, shares etc.)	Aggregate value of security provided during six months	Balance outstanding at the end of six months
Promoter or any other entity controlled by them	0	0	0

For Swati Project Limited

Sham Kumar

Chief Financial Officer

Promoter Group or any other entity controlled by them	0	0	0
Directors (including relatives) or any other entity controlled by them	0	0	0
KMPs or any other entity controlled by them	0	0	0
(D) Additional Information			Textual Information(2)

II. Affirmations

Affirmations	Compliance Status	Company Remarks
All loans (or other form of debt), guarantees, comfort letters (by whatever name called) or securities in connection with any loan(s) (or other form of debt) given directly or indirectly by the listed entity to promoter(s), promoter group, director(s) (including their relatives), key managerial personnel (including their relatives) or any entity controlled by them are in the economic interest of the company.	Yes	Textual Information(3)
Name	Sri Shashi Kumar	
Designation	CFO	
Place	Kolkata	
Date	15-04-2022	

For Swati Project Limited

Shashi Kumar

Chief Financial Officer



Signatory Details

Name of signatory	Sri Shashi Kumar
Designation of person	Chief Financial Officer
Place	Kolkata
Date	15-04-2022

For Swati Project Limited

Shashi Kumar

Chief Financial Officer

