MIRAJ GROUP SINCE 1987

ASIA PACK LIMITED

CIN : L74950RJ1985PLC003275

REGISTERED OFFICE
3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara,
Rajsamand, Rajasthan, India, PIN-313301

1800 120 3699

www.asiapackltd.com

Ref: APL/SEC/Reg 34/2021

Date: 23rd August, 2021

Corporate Relationship Department,
BSE Limited,
25th Floor, P J Towers, Dalal Street,
Mumbai, Maharashtra, India, PIN-400001
Email: corp.relations@bseindia.com
Email: corp.compliance@bseindia.com
Scrip Code: 530899

Dear Sir / Madam,

Subject: Notice of 36th Annual General Meeting and 36th Annual Report of Asia Pack Limited ("Company" or "APL") for the financial year 2020-21

Dear Sir/ Madam,

Pursuant to Regulation 34 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015 ("Listing Regulations"), we are submitting herewith Notice convening the 36th Annual General Meeting of the Company and 36th Annual Report of the Company for the financial year 2020-21.

The Annual Report containing the Notice is also uploaded on the Company's website http://www.asiapackltd.com/Content/UPLOADED/ANNUAL_REPORT-2020-21.pdf

You are requested to take the same on records, upload at your website & intimate the same to the members of the Stock Exchange.

Thanking you,

Yours faithfully,
For **Asia Pack Limited**

ANKITA MATA Digitally signed by ANKITA MATA Date: 2021.08.23 16:14:47 +05'30'

Name: **Ankita Mata**
Designation: **Company Secretary and Compliance Officer**
Membership No.: **A56788**
Address: **60, Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001**
M. No.: **08875992827**

Encl.: 36th Annual Report of the Company

36TH

ANNUAL

REPORT

2020-21

BOARD OF DIRECTORS:

Mr. Prakash Chandra Purohit	:	DIN: 01383197
Mr. Pushpendra Jain*	:	DIN: 03228950
Mr. Sunil Upadhayay	:	DIN: 06767593
Mrs. Prabhjeet Kaur	:	DIN: 07136767

*Appointed as an Additional Director w.e.f. 01.02.2021.

KEY MANAGERIAL PERSONNEL (KMP):

Mr. Pushpendra Jain, Chief Financial Officer (CFO)*
Mr. Jitendra Purohit, Chief Executive Officer (CEO)
Ms. Ankita Mata, Company Secretary and Compliance Officer (CS)
*Appointed as CFO w.e.f. 01.02.2021.

AUDITORS:

M/s Vinod Singhal & Co. LLP (FRN 005826C / C400276)
Chartered Accountants,
207, 222, 2nd Floor, Ganpati Plaza, M.I. Road, Jaipur, Rajasthan, India, PIN-302001

REGISTERED OFFICE:

3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

CIN:	**TELEPHONE:**	**Website**	**E-MAIL:**
L74950RJ1985PLC003275	1800 120 3699	www.asiapackltd.com	cs@mirajgroup.in / ankita.mata@mirajgroup.in

REGISTRAR AND SHARE TRANSFER AGENT: Bigshare Services Private Limited:	
Head Office: 1st Floor, Bharat Tin Works Building, Opp. Vasant Oasis, Makwana Road, Marol, Andheri (East), Mumbai-400059 Tel. No. 022-62638200, 62638222 e-Mail: investor@bigshareonline.com, Website: www.bigshareonline.com	**Branch Office:** 302 Kushal Bazar, 32-33, Nehru Place, New Delhi-110019 **Contact Person**: Mr. Mukesh Kumar **Tel.:** 011-42425004, 47565852 **e-Mail:** bssdelhi@bigshareonline.com **Website:** www.bigshareonline.com

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36th Annual General Meeting:		
Day	:	Thursday
Date	:	30th September, 2021
Time	:	11:00 A.M.
Venue [Registered Office]	:	3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

NOTICE OF 36TH ANNUAL GENERAL MEETING

NOTICE is hereby given that the 36th Annual General Meeting ("AGM" or "Meeting") of the **ASIA PACK LIMITED ("Company" or "APL")** will be held on **Thursday, 30th day of September, 2021 at 11:00 A.M.** at the registered office of the company situated at 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301 to transact the following businesses:

ORDINARY BUSINESS:

1. To receive, consider and adopt the Financial Statements of the Company for the financial year ended 31st March, 2021 and the Reports of the Board of Directors and Auditors thereon.

2. To appoint a Director in place of Mr. Prakash Chandra Purohit (DIN: 01383197) who retires by rotation and being eligible, offers himself for re-appointment.

SPECIAL BUSINESS:

3. **APPOINTMENT OF MR. PUSHPENDRA JAIN (DIN: 03228950) AS DIRECTOR [PROFESSIONAL-EXECUTIVE] OF THE COMPANY:**
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 152 of the Companies Act, 2013 readwith the Companies (Appointment and Qualification of Directors) Rules, 2014 (including any statutory modification(s) or re-enactment thereof for the time being in force) and pursuant to the applicable regulation of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and pursuant to the recommendation of the Nomination and Remuneration Committee and the Board of Directors, Mr. Pushpendra Jain (DIN: 03228950), who was appointed as an Additional Director of the Company with effect from 01st February, 2021 by the Board of Directors of the Company pursuant to Section 161(1) of the Companies Act, 2013 and Article 64 of Articles of Association of the Company and who holds office upto the date of this Annual General Meeting, and being eligible, offer himself for appointment and in respect of whom the Company has received a Notice in writing under Section 160 of the Companies Act, 2013 from him signifying his intention to propose his candidature for the office of Director, be and is hereby appointed with effect from the date of this Meeting as a Director of the company, liable to retire by rotation."

4. **APPROVAL OF REMUNERATION OF MR. PUSHPENDRA JAIN (DIN: 03228950), DIRECTOR CUM CFO OF THE COMPANY:**
To consider and if thought fit, to pass, with or without modification(s), the following resolution as **a Special Resolution:**

"RESOLVED THAT pursuant to the provisions of Sections 196, 197, 198 read with Schedule V and all other applicable provisions, if any, of the Companies Act, 2013 ("the Act") and the rules made thereunder (including any statutory modification(s) or re-enactment thereof for the time being in force) and pursuant to the recommendation of the Nomination and Remuneration Committee, the consent of the Members of the Company be and is hereby accorded for the payment of the remuneration payable to Mr. Pushpendra Jain (DIN: 03228950) as a Director cum CFO of the Company, in case of no / inadequate profits, as calculated under Section 198 of the Act, for the three Financial Years 2021-22, 2022-23 and 2023-24, in accordance with the limits prescribed under Schedule V of the Act on the terms and conditions and upon the payment of remuneration, allowances and perquisites/benefits, etc., as set out hereunder:

   a. **Remuneration**: Gross Salary at the rate of Rs. 51,129/- (Rupees Fifty One Thousand One Hundred Twenty Nine Only) per month, as detailed below, with a periodical / annual increments which will be effective 1st April each financial year or otherwise, as may be approved by the Board of Directors of the Company based on the recommendation / approval of the Nomination and Remuneration Committee, if any:

Particulars	**Amount**
Basic Salary + DA	Rs. 28,121
Uniform All. /Academic All.	Rs. 1,279
HRA	Rs. 12,782
Conv. Reimb./Car Reimb./Hire Chgs.	Rs. 2,044
Medical Allowance	Rs. 1,279

SP / HR Allow.	Rs. 5,624
Gross Salary	**Rs. 51,129.00**

b. **Others Perquisites, Benefits & Allowance(s)***:* Contribution to Provident Fund, Superannuation Fund or Annuity Fund, Gratuity, Leave Encashment, Other monetary / non-monetary benefits, reimbursement of expenses etc., as per the Rules of the Company.

c. **Communication Facilities (Facilities)**: The following shall not be included in the computation of perquisites:
   i. Provision of free telephone(s) and/or other communication facilities or reimbursement of telephone / communication expenses at residence including payment of local calls and long-distance official calls.

RESOLVED FURTHER THAT remuneration payable to him (including salary, bonus and/or special allowance, if any, allowances, perquisites and benefits, facilities, etc.) as set out herein may be increased/enhanced/decreased from time to time by the Board of Directors of the Company and/or the Nomination and Remuneration Committee, as it may, at its discretion deem fit, subject to the limits stipulated under Schedule V of the Companies Act, 2013 or any amendments made hereafter in this regard in such manner as may be agreed to between the Board and the Director, subject to such further approvals, if so required.

FURHTER RESOLVED THAT in the event of loss or inadequacy of profits in any financial year during the tenure of Mr. Pushpendra Jain as Director cum CFO of the company, the remuneration as set out herein or the revised remuneration as approved by the Board of Directors and/or the Nomination and Remuneration Committee, from time to time, to be paid to Mr. Pushpendra Jain be considered as minimum remuneration, subject to such approvals as may be necessary and the limits prescribed under Section 197 read with Schedule V of the Act.

FURHTER RESOLVED THAT Mr. Prakash Chandra Purohit (DIN: 01383197) Director(s) and / or Ms. Ankita Mata, Company Secretary of the Company or any person holding office as Director, Managing Director, Company Secretary of the Company be and are hereby severally authorized to furnish declaration, digitally sign and submit necessary form with the Registrar of Companies and to do such other acts, deeds and things as may be necessary to give effect to the said resolution."

5. **RATIFICATION OF RELATED PARTY TRANSACTIONS ENTERED DURING THE FINANCIAL YEAR 2020-2021:**
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 Regulation 23 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the applicable provisions of the Companies Act, 2013 and Rules made there under (including any statutory modification(s) thereof for the time being in force), Related Party Transactions Policy of the Company, approval of the members of the Company be and is hereby accorded for the Material Related Party Transactions as entered into by the Company with Related Parties during the Financial Year 2020-2021 as detailed in the explanatory statement annexed to this notice, the value of which either singly or all taken together exceeds ten percent of the annual consolidated turnover of the Company as per audited financial statements of Financial Year 2019-20 be and are hereby ratified and approved.

RESOLVED FURTHER THAT the Board of Directors be and is hereby authorized to undertake all such acts, deeds, matters and things and to execute all such deeds, documents and writings as may be deemed necessary, proper, desirable and expedient in its absolute discretion, for the purpose of giving effect to this resolution, and to settle any question, difficulty or doubt that may arise in this regard.

FURTHER RESOLVED THAT the Board of Directors be and is hereby authorised to delegate all or any of the powers conferred on it by or under this Resolution to any Committee of Directors of the Company or to any Director of the Company or any other officer(s) or employee(s) of the Company as it may consider appropriate in order to give effect to this Resolution."

6. **IN-PRINCIPAL APPROVAL FOR LOAN TO DIRECTORS, ETC.:**
To consider, and if thought fit, to pass, with or without modification(s), the following Resolution(s) as a **Special Resolution**:

"RESOLVED THAT pursuant to the provisions of Section 185 and all other applicable provisions, if any of the Companies Act, 2013 read with the Companies (Amendment) Act, 2017 and Rules made thereunder, including any statutory modification(s)

thereto or re-enactment(s) thereof, for the time being in force, and subject to such other consents, permissions, approvals, as may be required in that behalf, the approval of the members of the Company be and is hereby accorded to the Board of Directors of the Company (herein after called "the Board" which term shall be deemed to include any committee thereof, which the Board may have constituted or hereinafter constitute to exercise its powers including the powers conferred by this resolution and with the power to delegate such authority to any person or persons) to advance any loan including any loan represented by a book debt, or give any guarantee or provide any security in connection with any loan taken by any entity which is a subsidiary or associate or joint venture of the Company or any other person in whom any of the Directors of the Company is interested/deemed to be interested, up to limits approved by the shareholders of the Company u/s 186 of the Companies Act, 2013, from time to time, in their absolute discretion as may be deemed beneficial and in the interest of the Company, provided that such loans are utilized by the borrowing company for its principal business activities.

RESOLVED FURTHER THAT the Board of Directors be and is hereby authorized to undertake all such acts, deeds, matters and things and to execute all such deeds, documents and writings as may be deemed necessary, proper, desirable and expedient in its absolute discretion, for the purpose of giving effect to this resolution, and to settle any question, difficulty or doubt that may arise in this regard.

FURTHER RESOLVED THAT the Board of Directors be and is hereby authorised to delegate all or any of the powers conferred on it by or under this Resolution to any Committee of Directors of the Company or to any Director of the Company or any other officer(s) or employee(s) of the Company as it may consider appropriate in order to give effect to this Resolution."

By Order of the Board of Directors
For **Asia Pack Limited,**

Sd/-
Name: **Ankita Mata**
Designation: **Company Secretary and Compliance Officer**
Membership No.: **A56788**
Address: **60, Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001**

Date: 12th August, 2021
Place: Nathdwara

Information at a Glance	
Particulars	**Details**
Day, date and time of AGM	Thursday, 30th September, 2021 at 11.00 A.M. IST
Mode	Physical
Cut-off date for e-Voting	23rd September, 2021
E-Voting start time and date	09.00 A.M., 25th September, 2021
E-Voting end time and date	05.00 P.M., 29th September, 2021
E-Voting website of NSDL	https://www.evoting.nsdl.com/
Name, address and contact details of e-Voting service provider	National Securities Depository Limited Address: Trade World, A wing, 4th Floor, Kamala Mills Compound, Lower Parel, Mumbai, India, PIN-400013 Ms. Sarita Mote Designation: Assistant Manager E-mail id: evoting@nsdl.co.in Toll free no: : 1800 1020 990 and 1800 22 44 30
Name, address and contact details of Registrar and Transfer Agent	**Bigshare Services Private Limited:** **Head Office**: 1st Floor, Bharat Tin Works Building, Opp. Vasant Oasis, Makwana Road, Marol, Andheri (East), Mumbai-400059 Tel. No. 022-62638200, 62638222 e-Mail: investor@bigshareonline.com, Website: www.bigshareonline.com **Branch Office:** 302 Kushal Bazar, 32-33, Nehru Place, New Delhi-110019 **Contact Person**: Mr. Mukesh Kumar **Tel**.: 011-42425004, 47565852 e-**Mail**: bssdelhi@bigshareonline.com **Website**: www.bigshareonline.com

NOTES:

1. The Statement, pursuant to Section 102 of the Companies Act, 2013 ("the Act"), with respect to the businesses under Item Nos. 3 to 6 forms part of this Notice.

2. **PROFILE OF DIRECTORS**: Additional information, pursuant to Secretarial Standard-2 and regulation 36 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, in respect of the Director seeking appointment/re-appointment at the AGM is annexed hereto and forms integral part of the notice. The Director has furnished consent/declaration for his appointment/re-appointment as required under the Companies Act, 2013 and the rules made thereunder

3. A Member entitled to attend and vote at the Meeting is entitled to appoint a Proxy to attend and, on a poll, to vote instead of himself and the Proxy need not be a Member of the company.

4. Proxies, in order to be effective, must be received in the enclosed Proxy Form at the Registered Office of the company not less than forty-eight hours before the time fixed for the Meeting.

5. A person can act as a proxy on behalf of Members not exceeding 50 and holding in the aggregate not more than ten percent of the total share capital of the company carrying voting rights. A Member holding more than ten percent of total share capital of the company carrying voting rights may appoint a single person as proxy and such person shall not act as a proxy for any other person or shareholder.

6. A Corporate Member intending to send its authorised representatives to attend the Meeting in terms of Section 113 of the Companies Act, 2013 is requested to send to the company a certified copy of the Board Resolution / power of attorney authorizing such representative to attend and vote on its behalf at the Meeting.

7. Members / Proxies / Authorised Representatives are requested to bring their Attendance slip/proxy form duly filed in, sent herewith alongwith the Notice of the AGM at the Meeting. The members who hold shares in dematerialized form are requested to bring their Client Master List / Depository Participant Statement/ Delivery Instruction Slip reflecting their Client ID and DP ID No. for easier identification of attendance at the meeting.

8. During the period beginning 24 hours before the time fixed for the commencement of Meeting and ending with the conclusion of the Meeting, a Member would be entitled to inspect the proxies lodged at any time during the business hours of the company i.e. from 09:00 A.M. to 05:00 P.M.

9. Register of Contracts or arrangement in which Directors are interested as stipulated under Section 189 of the Companies Act, 2013 and Register of Directors and Key Managerial Personnel and their shareholding maintained under Section 170 of the Companies Act, 2013 are open for inspection by members and others at the registered office of the company on all working days during business hours of the company i.e. from 09:00 A.M. to 05:00 P.M. The said Registers shall also be produced at the commencement of Annual General Meeting and shall remain open and accessible during the continuance of the meeting to a person having the right to attend the meeting.

10. Shareholders holding shares in physical mode are requested to –
    a) Opt for Dematerialization of their shareholding through any of the SEBI registered Depository Participant.
    b) Members can avail themselves, the facility of nomination in respect of shares held by them in physical form pursuant to the provisions of Section 72 of the Act. Members desiring to avail themselves of this facility may send their nominations in the prescribed Form No. SH-13 duly filled to the Company's Registrar and Transfer Agents. Members holding shares in electronic form may contact their respective Depository Participant(s) for availing this facility
    c) Contribute to the cause of Green Initiative by registering their e-mail addresses, thereby facilitating the Company to send them by way of an e-mail, copies of Notice/s, Annual Report etc.
    d) Submit a self-attested copy of PAN Card, if not submitted earlier, with a view to comply with KYC norms.

11. Shareholders are requested to notify change of address, bank particulars, NECS particulars etc., if any, immediately to Company or Registrar and Share Transfer Agent. Members holding shares in dematerialized form are requested to intimate

all changes pertaining to their registered email id, bank detail, mandates, nominations, power of attorney, etc. to their Depository.

12. **INSPECTION OF RECORDS:** Register of Contracts or arrangements in which Directors are interested as stipulated under Section 189 of the Companies Act, 2013 and Register of Directors and Key Managerial Personnel and their shareholding maintained under Section 170 of the Companies Act, 2013 are open for inspection by members and others at the registered office of the company on all working days during business hours of the company i.e. from 09:00 A.M. to 05:00 P.M. The said Registers shall also be produced at the commencement of meeting and shall remain open and accessible during the continuance of the meeting to a person having the right to attend the meeting.

13. Any query relating to financial statements must be sent to the company's Registered Office at least seven days before the date of the Meeting.

14. **REGISTRATION OF E-MAIL ADDRESS:**
Members who have not registered their e-mail addresses so far are requested to register their email address for receiving all communications including Annual Report, Notices, Circulars etc. from the company electronically. Members holding shares in demat mode are requested to register their e-mail address through their respective Depository Participant. Members holding shares in physical mode are requested to register their e-mail address with RTA of the company.

15. Members holding shares in physical form are requested to consider converting their holding to dematerialized form to eliminate all risks associated with physical shares and for ease of portfolio management. Members can contact the Company or the Registrar and Share Transfer Agent for assistance in this regard.

16. **BANK ACCOUNT DETAILS:**
Regulation 12 and Schedule I of SEBI Listing Regulation requires all companies to use the facilities of electronic clearing services for payment of dividend, if any. In compliance with these regulations, payment of dividend will be made only by electronic mode directly into the bank account of Members and no dividend warrants or demand drafts will be issued without bank particulars.

17. Notice of the AGM and instructions for e-voting, along with the Attendance Slip and Proxy Form, are being sent by electronic mode to all members whose email addresses are registered with the Company / Depository Participant(s), unless a member has requested for a physical copy of the documents. For members who have not registered their email addresses, physical copies of the documents are being sent by the permitted mode.

18. Members are requested to bring their copy of the notice with them at the meeting as no extra copies of notice will be distributed at the meeting venue.

19. Route Map showing directions to reach to the venue of the meeting is given at the end of this Notice.

20. **REMOTE E-VOTING / VOTING THROUGH ELECTRONIC MEANS / INSTRUCTIONS OF E-VOTING:**

A. In compliance with Section 108 of the Companies Act, 2013 read with Rule 20 and Rule 21 of the Companies (Management and Administration) Rules, 2014, as amended by the Companies (Management and Administration) Amendment Rules, 2015 and Regulation 44 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company is pleased to provide members facility to exercise their right to vote on resolution (s) proposed to be considered at the meeting by electronic means and the business may be transacted through e-Voting Services. The facility of casting the votes by the members using an electronic voting system from a place other than venue of the AGM ("remote e-voting") will be provided by National Securities Depository Limited (NSDL).

B. The facility for voting through ballot paper shall be made available at the AGM and the members attending the AGM, who have not cast their votes by remote e-voting shall be able to exercise their right of voting at the AGM through ballot paper.

C. The Members who have cast their votes by remote e-voting prior to the AGM may attend the AGM but shall not be entitled to cast their votes again.

D. The remote e-voting period begins on Saturday, 25th September, 2021 (09:00 A.M.) and ends on Wednesday, 29th September, 2021 (05:00 P.M.). The remote e-voting module shall be disabled by NSDL for voting thereafter. The Members, whose names appear in the Register of Members / Beneficial Owners as on the record date (cut-off date) i.e 23rd September, 2021, may cast their vote electronically. The voting right of shareholders shall be in proportion to their share in the paid-up equity share capital of the Company as on the cut-off date, being 23rd September, 2021.

E. A person who is not a member as on the cut-off date should treat this Notice for information purpose only.

F. The way to vote electronically on NSDL e-Voting system consists of "Two Steps" which are mentioned below:

Step 1: Access to NSDL e-Voting system

A. Login method for e-Voting for Individual shareholders holding securities in demat mode

In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are advised to update their mobile number and email Id in their demat accounts in order to access e-Voting facility.

Login method for Individual shareholders holding securities in demat mode is given below:

Type of shareholders	Login Method
Individual Shareholders holding securities in demat mode with NSDL.	1. Existing **IDeAS** user can visit the e-Services website of NSDL Viz. https://eservices.nsdl.com either on a Personal Computer or on a mobile. On the e-Services home page click on the "Beneficial Owner" icon under "Login" which is available under 'IDeAS' section , this will prompt you to enter your existing User ID and Password. After successful authentication, you will be able to see e-Voting services under Value added 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 i.e. NSDL and you will be re-directed to e-Voting website of NSDL for casting your vote during the remote e-Voting period. If you are 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 2. 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 i.e. NSDL** and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period. 3. Shareholders/Members can also download NSDL Mobile App "**NSDL Speede**" facility by scanning the QR code mentioned below for seamless voting experience. **NSDL Mobile App is available on** App Store Google Play

Individual Shareholders holding securities in demat mode with CDSL	1. Existing users who have opted for Easi / Easiest, they can login through their user id and password. Option will be made available to reach e-Voting page without any further authentication. The URL for users to login to Easi / Easiest are https://web.cdslindia.com/myeasi/home/login or www.cdslindia.com and click on New System Myeasi. 2. After successful login of Easi/Easiest the user will be also able to see the E Voting Menu. The Menu will have links of **e-Voting service provider i.e. NSDL.** Click on **NSDL** to cast your vote. 3. If the user is not registered for Easi/Easiest, option to register is available at https://web.cdslindia.com/myeasi/Registration/EasiRegistration 4. Alternatively, the user can directly access e-Voting page by providing demat Account Number and PAN No. from a link in 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 provided links for the respective ESP i.e. **NSDL** where the e-Voting is in progress.
Individual Shareholders (holding securities in demat mode) login through their depository participants	You can also login using the login credentials of your demat account through your Depository Participant registered with NSDL/CDSL for e-Voting facility. upon logging in, you will be able to see e-Voting option. 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 i.e. NSDL and you will be redirected to e-Voting website of NSDL for casting your vote during the remote e-Voting period

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. NSDL and CDSL.

Login type	**Helpdesk details**
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.co.in or call at toll free no.: 1800 1020 990 and 1800 22 44 30
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 022- 23058738 or 022-23058542-43

B. Login Method for e-Voting for shareholders other than Individual shareholders holding securities in demat mode and shareholders holding securities in physical mode.

How to Log-in to NSDL e-Voting website?

1. 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.

2. Once the home page of e-Voting system is launched, click on the icon "Login" which is available under 'Shareholder/Member' section.

3. A new screen will open. You will have to enter your User ID, your Password/OTP and a Verification Code as shown on the screen.
   Alternatively, if you are registered for NSDL eservices i.e. IDEAS, you can log-in at https://eservices.nsdl.com/ with your existing IDEAS login. Once you log-in to NSDL eservices after using your log-in credentials, click on e-Voting and you can proceed to Step 2 i.e. Cast your vote electronically.

4. Your User ID details are given below:

Manner of holding shares i.e. Demat (NSDL or CDSL) or Physical	Your User ID is:
a) For Members who hold shares in demat account with NSDL.	8 Character DP ID followed by 8 Digit Client ID For example if your DP ID is IN300*** and Client ID is 12****** then your user ID is IN300***12******.
b) For Members who hold shares in demat account with CDSL.	16 Digit Beneficiary ID For example if your Beneficiary ID is 12********** then your user ID is 12**********
c) For Members holding shares in Physical Form.	EVEN Number followed by Folio Number registered with the company For example if folio number is 001*** and EVEN is 101456 then user ID is 101456001***

5. Password details for shareholders other than Individual shareholders are given below:

   a) If you are already registered for e-Voting, then you can user your existing password to login and cast your vote.

   b) If you are using NSDL e-Voting system for the first time, you will need to retrieve the 'initial password' which was communicated to you. Once you retrieve your 'initial password', you need to enter the 'initial password' and the system will force you to change your password.

   c) How to retrieve your 'initial password'?

      (i) If your email ID is registered in your demat account or with the company, your 'initial password' is communicated to you on your email ID. Trace the email sent to you from NSDL from your mailbox. Open the email and open the attachment i.e. a .pdf file. Open the .pdf file. The password to open the .pdf file is your 8 digit client ID for NSDL account, last 8 digits of client ID for CDSL account or folio number for shares held in physical form. The .pdf file contains your 'User ID' and your 'initial password'.

      (ii) If your email ID is not registered, please follow steps mentioned below in **process for those shareholders whose email ids are not registered.**

6. If you are unable to retrieve or have not received the "Initial password" or have forgotten your password:

   a) Click on "Forgot User Details/Password?"(If you are holding shares in your demat account with NSDL or CDSL) option available on www.evoting.nsdl.com.

   b) Physical User Reset Password?" (If you are holding shares in physical mode) option available on www.evoting.nsdl.com.

   c) If you are still unable to get the password by aforesaid two options, you can send a request at evoting@nsdl.co.in mentioning your demat account number/folio number, your PAN, your name and your registered address etc.

   d) Members can also use the OTP (One Time Password) based login for casting the votes on the e-Voting system of NSDL.

7. After entering your password, tick on Agree to "Terms and Conditions" by selecting on the check box.

8. Now, you will have to click on "Login" button.

9. After you click on the "Login" button, Home page of e-Voting will open.

Step 2: Cast your vote electronically on NSDL e-Voting system.

How to cast your vote electronically on NSDL e-Voting system?
1. After successful login at Step 1, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle is in active status. 2. Select "EVEN" of company for which you wish to cast your vote during the remote e-Voting period. 3. Now you are ready for e-Voting as the Voting page opens. 4. Cast your vote by selecting appropriate options i.e. assent or dissent, verify/modify the number of shares for which you wish to cast your vote and click on "Submit" and also "Confirm" when prompted. 5. Upon confirmation, the message "Vote cast successfully" will be displayed. 6. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page. **7.** Once you confirm your vote on the resolution, you will not be allowed to modify your vote.
General Guidelines for shareholders
1. Institutional shareholders (i.e. other than individuals, HUF, NRI etc.) are required to send scanned copy (PDF/JPG Format) of the relevant Board Resolution/ Authority letter etc. with attested specimen signature of the duly authorized signatory(ies) who are authorized to vote, to the Scrutinizer by e-mail to abhishek.gelra@gmail.com with a copy marked to evoting@nsdl.co.in **2.** It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential. Login to the e-voting website will be disabled upon five unsuccessful attempts to key in the correct password. In such an event, you will need to go through the "Forgot User Details/Password?" or "Physical User Reset Password?" option available on www.evoting.nsdl.com to reset the password. **3.** In case of any queries, you may refer the Frequently Asked Questions (FAQs) for Shareholders and e-voting user manual for Shareholders available at the download section of www.evoting.nsdl.com or call on toll free no.: 1800 1020 990 and 1800 22 44 30 or send a request to Ms. Sarita Mote at evoting@nsdl.co.in

Process for those shareholders whose email ids are not registered with the depositories/company for procuring user id and password and registration of e mail ids for e-voting for the resolutions set out in this notice:

1. In case shares are held in physical mode please provide Folio No., Name of shareholder, scanned copy of the share certificate (front and back), PAN (self attested scanned copy of PAN card), AADHAAR (self attested scanned copy of Aadhaar Card) by email to cs@mirajgroup.in
2. In case shares are held in demat mode, please provide DPID-CLID (16 digit DPID + CLID or 16 digit beneficiary ID), Name, client master or copy of Consolidated Account statement, PAN (self attested scanned copy of PAN card), AADHAAR (self attested scanned copy of Aadhaar Card) to cs@mirajgroup.in. If you are an Individual shareholders holding securities in demat mode, you are requested to refer to the login method explained at **step 1 (A)** i.e. Login method for e-Voting for Individual shareholders holding securities in demat mode.
3. Alternatively shareholder/members may send a request to evoting@nsdl.co.in for procuring user id and password for e-voting by providing above mentioned documents.
4. In terms of SEBI circular dated December 9, 2020 on e-Voting facility provided by Listed Companies, Individual shareholders holding securities in demat mode are allowed to vote through their demat account maintained with Depositories and Depository Participants. Shareholders are required to update their mobile number and email ID correctly in their demat account in order to access e-Voting facility.

21. Mr. Abhishek Gelra Proprietor of M/s. Abhishek Gelra & Associates, Chartered Accountants, Rajsamand, (Firm Registration No. 021265C), has been appointed as the Scrutiniser to scrutinise the voting and remote e-voting process in a fair and transparent manner.

22. The Chairman shall, at the end of discussion in the AGM on the resolution(s) on which voting is to be held, allow voting with the assistance of scrutiniser, by use of ballot paper / polling paper for all those members who are present at the AGM but have not cast their votes by availing the remote e-voting facility.

23. The Scrutiniser shall after the conclusion of voting at the AGM, first count the votes cast at the meeting and thereafter unblock the votes cast through remote e-voting in the presence of at least two witnesses not in the employment of the Company and shall make, not later than three days of the conclusion of the AGM, a consolidated scrutiniser's report of the

total votes cast in favour or against, if any, to the Chairman or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.

24. The Results declared alongwith the report of the Scrutiniser shall be placed on the website of the Company www.asiapackltd.com and on the website of NSDL immediately after the declaration of result by the Chairman or a person authorized by him in writing. The results shall also be immediately forwarded to the BSE Limited, Mumbai.

25. The Scrutinizer will submit his report to the Chairman of the Company ('the Chairman') or to any other person authorized by the Chairman after the completion of the scrutiny of the e-voting (votes casted during the AGM and votes casted through remote e-voting), within two working days of the conclusion of the AGM. The result declared along with the Scrutinizer's report shall be communicated to the stock exchanges, NSDL, and RTA and will also be displayed on the Company's website, www.asiapackltd.com.

26. Route-map to the venue of the Meeting is provided at the end of the Notice.

27. ADDITIONAL INFORMATION ON DIRECTOR SEEKING / RECOMMENDED FOR APPOINTMENT/ RE-APPOINTMENT AND/OR FIXATION OF REMUNERATION AS REQUIRED UNDER REGULATION 36 (3) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS) REGULATIONS, 2015 AND SECRETARIAL STANDARD-2:

Name of Director	Mr. Prakash Chandra Purohit	Mr. Pushpendra Jain
DIN	01383197	03228950
Date of Birth	10/07/1969	19/01/1979
Nationality	Indian	Indian
Qualifications	Under Graduate	Graduate in Commerce, LL.B. and Diploma in Labour Law (DLL)
Expertise in specific Functional areas / Brief Resume	Expertise: Business Consultancy, Administration, Finance, Taxation, Management, etc. He has contributed to the Company and Society immensely. He is having vast experience of more than 3 decade in the field of paper industry, real estate and other fields in which the company can expand in the coming future, etc.	Expertise: Administration, Finance, Taxation, etc. He has served on several boards of directors of various Companies and having vast experience of more than 18 years in accounts and finance department.
Terms and conditions of appointment or re-appointment.	Re-appointment due to retires by rotation. No remuneration is being proposed / sought to be paid on re-appointment.	Appointment / Regularization as a Director of the Company. Mr. Pushpendra Jain is drawing remuneration of Rs. 51,129 (Rupees Fifty One Thousand One Hundred Twenty Nine only) per month as salary and the same is being proposed / sought to be paid on appointment.
The remuneration last drawn	Nil	Rs. 51,129 (Rupees Fifty One Thousand One Hundred Twenty Nine Only)
Date of first appointment on the Board	24th February, 2010	01st February, 2021
Shareholding in the company	Mr. Prakash Chandra Purohit does not hold by himself or for any other person on a beneficial basis, any shares in the Company.	Nil

Relationship with other Directors, Manager and other Key Managerial Personnel of the company / Disclosure of relationships between directors inter-se	There is no inter-se relationship between Mr. Prakash Chandra Purohit and other members of the Board and Key Managerial Personnel of the Company	There is no inter-se relationship between Mr. Pushpendra Jain and other members of the Board and Key Managerial Personnel of the Company
The number of Meetings of the Board attended during the year (Financial Year 2020-21)	Five (5)	Nil
Listed companies (other than Asia Pack Limited) in which holds directorship and Committees Membership:	Directorship: Nil	Directorship: Nil
	Chairperson of Board Committees: Nil	Chairperson of Board Committees: Nil
	Member of Board Committees: Nil	Member of Board Committees: Nil
Other Directorships, Membership / Chairmanship of Committees of other Boards	**Directorship:** 1. Miraj Projects Limited 2. Miraj Realcon Private Limited 3. Miraj Business Development Private Limited **Chairman of Stakeholders Relationship Committee:** 1. Asia Pack Limited **Member of Audit Committee:** 1. Asia Pack Limited **Member of Nomination and Remuneration Committee:** 1. Asia Pack Limited **Member of Corporate Social Responsibility Committee:** 1. Miraj Business Development Private Limited (till 04.09.2020)	**Nil**

By Order of the Board of Directors
For **Asia Pack Limited,**

Sd/-
Name: **Ankita Mata**
Designation: **Company Secretary and Compliance Officer**
Membership No.: **A56788**
Address: **60, Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001**

Date: 12th August, 2021
Place: Nathdwara

STATEMENT PURSUANT TO SECTION 102 OF THE COMPANIES ACT, 2013:

The following statement, pursuant to section 102 of the Companies Act, 2013 ('the Act'), sets out all material facts relating to the businesses mentioned at Item Nos. 3 to 6 of the accompanying Notice.

ITEM NO. 3:

Mr. Pushpendra Jain is graduate in Commerce, LL.B. and Diploma in Labour Law (DLL). He has served on board of directors of various Companies and having vast experience of more than 18 years in Accounts and Finance department.

Based on the recommendation of the Nomination and Remuneration Committee, the Board of Directors of the Company, pursuant to provisions of Section 152 and 161 of the Companies Act, 2013 ("the Act") and the Articles of Association of the Company, had appointed Mr. Pushpendra Jain (DIN: 03228950) as an Additional Director of the Company with effect from February 01, 2021 holds office up to the date of this Annual General Meeting, and is eligible for appointment as Director of the company. The company has received Notice under Section 160 of the Companies Act, 2013 from him signifying his intention to propose his candidature for the office of Director.

In this context, the Company has received from Mr. Pushpendra Jain (i) Consent in writing to act as Director in Form DIR-2 pursuant to Rule 8 of the Companies (Appointment & Qualification of Directors) Rules, 2014 and (ii) Intimation in Form DIR-8 in terms of the Companies (Appointment & Qualification of Directors) Rules, 2014, to the effect that he is not disqualified under Section 164(2) of the Act (iii). Notice in writing from him under Section 160 of the Companies Act, 2013 proposing his candidature for the office of Director. Additional information in respect of Mr. Pushpendra Jain, pursuant to standard 1.2.5 of the Secretarial Standard on General Meetings (SS-2), is provided in notes to this Notice.

The Board of Directors considers it in the interest of the company to appoint Mr. Pushpendra Jain (DIN: 03228950) as a Director and hence it recommends the said Resolution No. 3 for approval by the members of the Company.

None of the Directors, Key Managerial Personnel and/or their relatives, except Mr. Pushpendra Jain (DIN: 03228950), to whom the resolution relates, is/are interested or concerned, financially or otherwise in the resolution.

ITEM NO. 4:

Mr. Pushpendra Jain (DIN: 03228950) is in the whole-time employment of the Company designated as CFO and having rich experience, vast knowledge and varied experience of more than 18 years in accounts and finance department, etc. Keeping in view of his role and responsibilities in the organization, he was appointed as additional director on the Board and proposed to be appointed as a Director of the Company w.e.f. 30.09.2021, resulting which remuneration payable to him as Employee / Director cum CFO of the Company may seek approval of members, hence for better corporate governance approval of members in general meeting pursuant to the provisions of section 196, 197, read with schedule V and other applicable provisions, rules if any, of the Companies Act, 2013 is being sought.

In the event of loss or inadequacy of profits in any financial year(s), during his tenure as Director of the company, the remuneration payable to him as mentioned in the resolution(s), shall be paid, subject to the provisions of Schedule V of the Companies Act, 2013 or any Statutory modification thereof, including approval of members of the Company and/or Central Government, if necessary.

The particulars required to be disclosed in the explanatory statement in accordance with provisions of Section II of Part II of Schedule V of the Companies Act, 2013, are enclosed in a separate statement and form a part of this notice.

The particulars required to be disclosed in the explanatory statement in accordance with provisions of Secretarial Standard-2 related to appointment or re-appointment and/or fixation of remuneration of Directors, are enclosed in a separate statement and form a part of this notice.

Mr. Pushpendra Jain is interested in this resolution to the extent of his appointment as a Director. None of the Directors, Key Managerial Personnel and/or their relatives, is/are interested or concerned, financially or otherwise in the resolution except as may be deemed to be concerned or interested in the proposed resolution to the extent of their shareholding in the Company, if any.

The Board of Directors of the Company recommends the Resolution(s) as set out in the accompanied Notice for approval of the shareholders by way of Special Resolution.

ITEM NO. 5:

As per the provisions of Section 188 (1) of the Companies Act, 2013 "Related Party Transactions" requires obtaining prior consent of the Board where transactions proposed to be entered into falls in the list of items referred therein and are within threshold limits prescribed under Rule 15 of Companies (Meeting of Board and its Power) Rules, 2015. Rule 15 of Companies (Meeting of Board and its Power) Rules, 2014 requires taking prior approval of the Company by Resolution where transactions proposed to be entered to falls, in the list of items referred therein and are in excess of threshold limits. Proviso to Section 188 further provides that nothing contained in sub-section (1) of Section 188 applies where transactions are entered into by the company in the ordinary course of business other than transactions which are not on an arm's length basis. All transactions entered into by the Company with Related Parties are in the ordinary course of business and are at arm's length basis.

As per the provisions of Regulation 23 of SEBI (LODR) Regulations, 2015, all related party transactions shall be considered as "Material" if the transaction entered with individually or taken together with a Related Party alongwith previous transactions during a Financial Year exceed 10% of the Annual Consolidated Turnover of the company as per the Last Audited Financial Statement of the Company. The Material Related Party Transactions requires approval of the Shareholders by passing a Resolution and in respect of voting on such resolution(s), the said related party shall abstain from voting.

Members may please note that based on the criteria as mentioned above in Regulation 23 of SEBI (LODR) Regulations, 2015, transactions entered into by the Company with some of Related Party/ies, tabled below, for the Financial Year 2020-2021 are "Material" and the value of which either singly or all taken together exceeds ten percent of the annual consolidated turnover of the Company as per audited financial statements of Financial Year 2019-2020 and therefore requires ratification of the said transactions by the Members of the Company by Ordinary Resolutions.

Sl. No.	Name(s) of the Related Party/ies	Nature of Relationship	Type of contracts / arrangements / transactions	Total Value of all the contracts / arrangements / transactions
1	Miraj Products Private Limited	Enterprises are under common control	Payments for Rent, Repairs and Maintenance, and Payment of Services/Goods	INR 1,05,000
2	Aacharan Enterprises Private Limited			INR 43,680
3	Aacharan Enterprises Private Limited		Loans and Advances Given	INR 2,38,00,000
4	Jitendra Purohit	Key Management Personnel	Loans and Advances Given	INR 1,30,000

The Audit Committee has also given their prior omnibus approval to the transactions entered as mentioned above during the Financial Year 2020-2021.

Members are hereby informed that pursuant to Regulation 23 of SEBI (LODR) Regulations, 2015, no Members of the Company shall vote on the Resolution to ratify related party transactions entered into by the Company during the Financial Year 2020-2021 as mentioned above if such Member is a related party.

The Board of Directors of the Company recommends the Ordinary Resolution as set out at Item No. 5 in the accompanying Notice for ratification of Related Party Transactions by the Members of the Company. All documents concerning Item No. 5 are available for inspection at the Registered Office of the Company from 11 A.M. to 01 P.M. on all working days till the date of the forthcoming Annual General Meeting of shareholders.

Except Mr. Jitendra Purohit, CEO, and his relatives are concerned or interested financially or otherwise, none of the Directors and the Key Managerial Personnel of the Company and their relatives is concerned or interested, financially or otherwise, in the said Resolution at Item No. 5 of the Notice.

ITEM NO. 6:

As per the provisions of Section 185 of the Companies Act, 2013, no company shall, directly or indirectly, advance any loan including any loan represented by a book debt, to any of its Directors or to any other person in whom the Director is interested

or give any guarantee or provide any security in connection with any loan taken by him or such other person. However, in order to promote ease of doing business, the entire Section 185 of the Companies Act, 2013 has been substituted vide Companies (Amendment) Act, 2017 and the same was notified by the Ministry of Corporate Affairs on 7th May, 2018.

In terms of the amended Section 185 of the Act, a company may advance any loan, including any loan represented by a book debt, to any person in whom any of the Directors of the Company is interested or give any guarantee or provide any security in connection with any loan taken by any such person, subject to the condition that approval of the shareholders of the Company is obtained by way of passing a Special Resolution.

The management is of the view that the Company may advance any loan including any loan represented by a book debt, or give any guarantee or provide any security in connection with any loan taken by any person in whom any of the director of the company is interested, as and when required, for their business and which would be utilized for their principal business activities.

In view of the above; and in line with the approval of the shareholders accorded taken through special resolution dated 30th September, 2020 under section 186 of the Act & as an abundant caution, the Board at its meeting held on August 12, 2021 decided to seek approval of the shareholders pursuant to the amended provisions of Section 185 of the Act to advance any loan including any loan represented by book debt, or give guarantee or provide any security in connection with any loans / debentures / bonds etc. raised by any person in whom any of the director of the company is interested up to an aggregate amount of approved by the shareholder of the Company under Section 186 of the Company Act, 2013 i.e. Rs. 200,00,00,000 (Rupees Two Hundred Crores Only) over and above the limit of 60% of the paid-up share capital, free reserves and securities premium account of the Company or 100% of free reserves and securities premium account of the Company, whichever is more.

None of the Directors, Key Managerial Personnel and/or their relatives, is/are interested or concerned, financially or otherwise in the resolution except as may be deemed to be concerned or interested in the proposed resolution to the extent of their shareholding in the Company.

The Board of Directors of the Company recommends the Resolution(s) as set out in the accompanied Notice for approval of the shareholders by way of Special Resolution.

By Order of the Board of Directors
For **Asia Pack Limited,**

Sd/-
Name: **Ankita Mata**
Designation: **Company Secretary and Compliance Officer**
Membership No.: **A56788**
Address: **60, Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001**

Date: 12th August, 2021
Place: Nathdwara

STATEMENT PURSUANT TO THE PROVISIONS OF SECTION II OF PART II OF SCHEDULE V OF THE COMPANIES ACT, 2013 WITH RESPECT TO ITEM NO. 4 OF THE NOTICE:

I. General Information:

(1) *Nature of industry:* ***Real Estate Industry.***

(2) *Date or expected date of commencement of commercial production:* ***The Company commenced business from the date of its incorporation on 23rd April, 1985.***

(3) *In case of new companies, expected date of commencement of activities as per project approved by financial institutions appearing in the prospectus:* ***Not Applicable***

(4) *Financial performance based on given indicators:* ***The financial performance of the Company for last three years is as under:***

(Amount in Rupees)

Financial Parameter	**Year ended**		
Particulars	**2020-21**	**2019-20**	**2018-19**
Total Revenue	14,55,000	9,60,000	8,36,000
Net Profit /(Loss)	(9,79,832)	(2,184,958)	(11,58,264)
Dividend %	-	-	-
Paid up capital	2,73,08,599	2,73,08,599	2,73,08,599
Reserves and Surplus	16,03,06,994	15,93,16,082	15,72,83,960

(5) *Foreign investments or collaborators, if any:* ***Not Applicable***

II. Information about the appointee:

(1) *Background details:* **Mr. Pushpendra Jain (DIN: 03228950) is Graduate in Commerce, LL.B. and Diploma in Labour Law (DLL). He is having expertise knowledge in the field of Administration, Finance, Taxation, etc. He has served on several boards of directors of various Companies and and having rich experience, vast knowledge and varied experience of more than 18 years in accounts and finance department, etc.**

(2) *Past remuneration:* ***Rs. 51,129 (Rupees Fifty One Thousand One Hundred Twenty Nine Only) per month.***

(3) *Recognition or awards:* ***N.A.***

(4) *Job profile and his suitability:* ***Mr. Pushpendra Jain joined the Company as CFO w.e.f. 01st February, 2021 and looking after the*** **matters related to Accounts, Finance, Taxation, etc.** ***as he is having rich experience, vast knowledge and varied experience of more than Eighteen (18) years in the field of Accounts, Finance, etc.***

(5) *Remuneration proposed:* ***Remuneration, other perquisites, benefits & allowance(s) and communication facilities as fully set out in the special resolution readwith explanatory statement of item no. 04 of the Notice. The remuneration proposed is well within the maximum permissible remuneration as per Schedule V of the Companies Act, 2013.***

(6) *Comparative remuneration profile with respect to industry, size of the company, profile of the position and person* (*in case of expatriates the relevant details would be w.r.t. the country of his origin*): ***The remuneration is in line with the industry standards. Further the proposed remuneration is within the maximum permissible remuneration as per Schedule V of the Companies Act, 2013 which is comparable with the Companies of the same size and profitability.***

(7) *Pecuniary relationship directly or indirectly with the company, or relationship with the managerial personnel, if any:* ***There is no inter-se pecuniary relationship between Mr. Pushpendra Jain and other members of the Board and Key Managerial Personnel of the Company.***

III. Other information:

(1) *Reasons of loss or inadequate profits:* ***The stringent market conditions in real estate industry and capital as well as revenue expenditure are the main reasons of inadequate profits.***

(2) *Steps taken or proposed to be taken for improvement:* ***The Company has adopted the following measures to improve the profitability and to reduce its operations costs, viz.:***

- ***Reduction in employee costs***
- ***Invoking the force majeure clause under various lease agreements***
- ***Cost control in all other areas***
- ***Focus on significant improvements in operating costs***

Further, Company is planning to setup various real estate projects at different locations all over Rajasthan.

Furthermore, the Company believes that it will well position to capture significant growth opportunities and profitability because of its following principal competitive strengths:

1. ***Extensive reach and market share***
2. ***Strong marketing and brokerage sales***
3. ***Brand name recognition***

(3) *Expected increase in productivity and profits in measurable terms:* ***It is difficult to forecast the productivity and profitability in measurable terms. However, the Company expects that productivity and profitability may improve in future. Management expects to have higher productivity and profits in line with the estimated budget. The Company is focusing on strengthening its core competency in real estate sector, as well as the Company has taken initiatives to improve the position as against competing organizations and will continue in its endeavor to increase the market share in the real estate industry of the Company to improve profitability.***

In addition to the above, certain strategic management/financial changes made during the previous financial years which would result in further cost reduction and thereby contributing to the profitability in the years to come.

By Order of the Board of Directors
For **Asia Pack Limited,**

Sd/-
Name: **Ankita Mata**
Designation: **Company Secretary and Compliance Officer**
Membership No.: **A56788**
Address: **60, Jawahar Nagar, Udaipur, Rajasthan, India, PIN-313001**

Date: 12th August, 2021
Place: Nathdwara

BOARD'S REPORT & MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Dear Members,

The Board of Directors hereby submits the report of the business and operations of your Company ("the Company" or "APL"), along with the audited financial statements, for the financial year ended March 31, 2021.

1. FINANCIAL SUMMARY AND HIGHLIGHTS:

The financial results for the year ended 31st March, 2021 and the corresponding figures for the last year are as under:

(Amount in Rupees except EPS)

Particulars	**Current Financial Year 2020-21**	**Previous Financial Year 2019-20**
Revenue from Operations	14,55,000	9,60,000
Other Income	58,72,527	92,40,037
Profit/ (Loss) before Depreciation, Finance Costs, Exceptional items and Tax Expense	23,73,493	39,61,888
Less: Depreciation/ Amortisation/ Impairment	6,69,441	7,06,455
Profit / (Loss) before Finance Costs, Exceptional items and Tax Expense	17,04,052	32,55,433
Less: Finance Costs	-	9,202
Profit / (Loss) before Exceptional items and Tax Expense	17,04,052	32,46,231
Add / (less): Exceptional items	-	-
Profit / (Loss) before Tax Expense	17,04,052	32,46,231
Less: Tax Expense (Current & Deferred)	7,24,220	10,61,273
Profit / (Loss) for the year (1)	9,79,832	21,84,958
Other Comprehensive Income / (Loss) (2)	11,080	(1,52,836)
Total (1+2)	9,90,912	20,32,122
Balance carried forward	**9,90,912**	**20,32,122**

2. AMOUNT TRANSFER TO RESERVE:

The Board of Directors of your company, has decided not to transfer any amount to the Reserves for the year under review.

3. DIVIDEND:

The Board of Directors of your company, after considering holistically the relevant circumstances and keeping in view financial position of the Company, has decided that it would be prudent, not to recommend any Dividend for the year under review.

4. CORPORATE OVERVIEW AND THE STATE OF THE COMPANY'S AFFAIRS:

The Company is presently engaged in real estate business. The Company has substantial revenue from Rental of Properties and Interest during the year. The company total revenue of Rs. 73,27,527/- in current year as compare to previous year Rs. 1,02,00,037/-. Profit after tax for the year ended was Rs. 9,90,912/-, as compare to Rs. 20,32,122/-, in the previous year.

5. CHANGES IN THE NATURE OF BUSINESS:

There is no change in nature of the business of the Company during the year under review.

6. MATERIAL CHANGES AND COMMITMENTS, IF ANY, AFFECTING THE FINANCIAL POSITION OF THE COMPANY WHICH HAS OCCURRED BETWEEN THE END OF THE FINANCIAL YEAR OF THE COMPANY TO WHICH THE FINANCIAL STATEMENTS RELATE AND THE DATE OF THE REPORT:

There have been no material changes and commitments, which affect the financial position of the Company, that have occurred between the end of the financial year to which the financial statements relate and the date of this report.

7. SHARE CAPITAL:

The paid-up equity share capital of the company as at March 31, 2021 stood at Rs. 2,63,74,200/– (Rupees Two Crore Sixty Three Lakh Seventy Four Thousand Two Hundred Only) divided into 26,37,420 (Twenty Six Lakh Thirty Seven Thousand Four hundred Twenty) equity shares of Rs. 10/– (Rupees Ten) each. During the year under review, the Company has not issued shares with differential voting rights nor has granted any stock options or sweat equity. As on March 31, 2021, none of the Directors of the Company hold instruments convertible into equity shares of the Company.

a) Buy Back of Securities:
The Company has not bought back any of its securities during the year under review.

b) Sweat Equity:
The Company has not issued any Sweat Equity Shares during the year under review.

c) Bonus Shares:
No Bonus Shares were issued during the year under review.

d) Employees Stock Option Plan:
The Company has not provided any Stock Option Scheme to the employees.

e) Issue of debentures, bonds or any non-convertible securities:
The Company has not issued debentures, bonds or any non-convertible securities during the year under review.

f) Issue of warrants:
The Company has not issued warrants during the year under review.

8. TRANSFER OF AMOUNTS TO INVESTOR EDUCATION AND PROTECTION FUND:

Since there were no funds lying / remains unpaid or unclaimed for a period of seven years, the provisions of Section 125 (2) of the Companies Act, 2013 do not apply.

9. DETAIL OF DIRECTORS AND KEY MANAGERIAL PERSONNEL, WHO WERE APPOINTED AND RESIGNED DURING THE YEAR:

The Board of Directors of your Company as on date of this report comprises of four directors, of which one (1) is an Executive Additional Director cum CFO and Two (2) are Independent Directors. Rest of the One (1) director is Non-Executive & Non-Independent Director.

In accordance with the provisions of Section 152 of Companies Act, 2013 Mr. Prakash Chandra Purohit (DIN: 01383197), retires by rotation and being eligible, offer his candidature for re-appointment as Director of the company at the ensuing Annual General Meeting. The Board recommends his re-appointment.

During the year under review and till the date of this report, there were following changes in composition of Board of Directors and Key Managerial Personnel of the Company:

a. Mr. Arpit Lodha resigned from the post of Company Secretary and Compliance Officer w.e.f. 31st July, 2020.
b. Ms. Ankita Mata was appointed as Company Secretary and Compliance Officer of the Company w.e.f. 01st August, 2020.
c. Mrs. Prabhjeet Kaur was re-appointed as an Independent Non-Executive Director of the Company for a second term of five consecutive years with effect from 26th March, 2020 to 25th March, 2025 at the 1st Extraordinary General Meeting of 2019-20 of the Company was held on Thursday, 11th June, 2020 [which was originally convened on 25th March, 2020 and rescheduled due to COVID-19 pandemic outbreak].
d. Mr. Revant Purbia resigned from the office of Director cum Chief Financial Officer w.e.f. 31st January, 2021.
e. Mr. Pushpendra Jain was appointed as an Additional Director cum Chief Financial Officer (CFO) w.e.f. 01st February, 2021 and hold the said office as an Additional Director till the conclusion of ensuing Annual General Meeting.

The Board is of the view that the appointment of Mr. Pushpendra Jain on the Company's Board as Director is desirable and would be beneficial to the Company. Hence, on the recommendation of Nomination and Remuneration Committee, Board of Directors proposes to appoint Mr. Pushpendra Jain as Director of the Company.

Brief resume of directors seeking appointment / re-appointment along with other details as stipulated under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") is separately disclosed in the Notice and form an integral part of this report.

Details of Key Managerial Personnel are as under:

Sl. No.	Name	Designation
1	Mr. Revant Purbia	Chief Financial Officer (CFO) (Resigned w.e.f. January 31, 2021)
2	Mr. Pushpendra Jain	Chief Financial Officer (CFO) (Appointed w.e.f. February 1, 2021)
3	Mr. Jitendra Purohit	Chief Executive Officer (CEO)
4	Mr. Arpit Lodha	Company Secretary (CS) and Compliance Officer (Resigned w.e.f July 31, 2020)
5	Ms. Ankita Mata	Company Secretary (CS) and Compliance Officer (Appointed w.e.f August 1, 2020)

The Company has received declarations from all the Independent Directors of the Company confirming that:

a. they meet the criteria of independence prescribed under the Act and the Listing Regulations and
b. they have registered their names in the Independent Directors' Databank.

10. BOARD MEETINGS:

Total Five (5) Board Meetings were held during the year under review after due compliance the provisions of Section 173 of the Companies Act, 2013. The meeting details are provided in the corporate governance report that forms integral part of this Report. The maximum interval between any two meetings did not exceed 120 days, as prescribed in the Companies Act, 2013.

11. COMMITTEES OF THE BOARD:

The Board has three (3) committees:

1. Audit Committee
2. Nomination and Remuneration Committee
3. Stakeholders' Relationship Committee

Details of all the committees, along with their Charters, Composition and Meetings held during the year, are provided in the Report on Corporate Governance, forms integral part of this Report.

12. BOARD EVALUATION:

Pursuant to the provisions of the Companies Act, 2013 and the Listing Regulations, the Board has carried out an annual evaluation of its own performance, performance of its directors individually and the committees of the Board and the same is reviewed by the Nomination and Remuneration Committee.

Evaluation:
The Board evaluated the effectiveness of its functioning, of the Committees and of individual Directors, pursuant to the provisions of the Act and the SEBI Listing Regulations.

The Board sought the feedback of Directors on various parameters including:

- Degree of fulfillment of key responsibilities towards stakeholders (by way of monitoring corporate governance practices, participation in the long-term strategic planning, etc.);

- Structure, composition and role clarity of the Board and Committees;
- Extent of co-ordination and cohesiveness between the Board and its Committees;
- Effectiveness of the deliberations and process management;
- Board / Committee culture and dynamics; and
- Quality of relationship between Board Members and the Management.

The above criteria are broadly based on the Guidance Note on Board Evaluation issued by the Securities and Exchange Board of India on January 5, 2017. The Chairman of the Board had one-to-one meeting with the Independent Directors ('IDs') and the Chairman of NRC had one-to-one meeting with the Executive and Non-Executive, Non-Independent Directors. These meetings were intended to obtain Directors' inputs on effectiveness of the Board / Committee processes.

In a separate meeting of the IDs, the performance of the Non-Independent Directors, the Board as a whole and Chairman of the Company were evaluated taking into account the views of Executive Directors and other Non-Executive Directors.

The Nomination and Remuneration Committee reviewed the performance of the individual directors and the Board as a whole.

In the Board meeting that followed the meeting of the Independent Directors and the meeting of the NRC, the performance of the Board, its Committees, and individual directors were discussed.

In the coming year, the Board intends to enhance focus on sustainability and digital interventions.

13. PARTICULARS OF EMPLOYEES:

The statement containing particulars of employees required under Section 197(12) of the Companies Act, 2013, read with Rule 5 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, is provided in a separate exhibit forming part of this report as per Section 197 read with Rule 5 of The Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, are set out in Annexure-1 attached thereto.

14. DIRECTORS' RESPONSIBILITY STATEMENT:

The financial statements in compliance with the requirements of the Companies Act, 2013 and the Generally Accepted Accounting Principles (GAAP) in India. The financial statements have been prepared on accrual basis under the historical cost convention. The estimates and judgments relating to the financial statements are made on a prudent basis, so as to reflect in a true and fair manner, the form and substance of transactions and reasonably present the Company's state of affairs and profit / (loss) for the year ended March 31, 2021. To the best of knowledge and belief and according to the information and explanations obtained, your Directors make the following statement in terms of Section 134 (3) (c) of the Companies Act, 2013.

Your Directors confirm that:

a. In the preparation of the annual accounts for the year ended March 31, 2021, the applicable accounting standards read with requirements set out under Schedule III to the Act, have been followed and there are no material departures from the same;

b. The Directors 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 as at March 31, 2021 and of the profit / loss of the Company for the year ended on that date;

c. The directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of this Act for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;

d. The directors have prepared the annual accounts on a going concern basis;

e. The Company had laid down internal financial controls to be followed by the Company and that such internal financial controls are adequate and operating efficiently.

f. The Directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems are adequate and operating effectively.

15. MANAGEMENT'S DISCUSSION AND ANALYSIS REPORT:

Management's Discussion and Analysis Report for the year under review, as stipulated under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, is presented in a separate section, forming part of the Annual Report.

16. CORPORATE GOVERNANCE:

The Company is committed to maintain the highest standards of Corporate Governance and adheres to the Corporate Governance requirements set out by the Securities and Exchange Board of India ("SEBI").

The Company has also implemented several best governance practices. The report on Corporate Governance as stipulated under the Listing Regulations forms part of the Annual Report.

17. INTERNAL FINANCIAL CONTROL AND ITS ADEQUACY:

The Board has adopted policies and procedures for ensuring the orderly and efficient conduct of its business, including the 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 disclosures.

The audit committee of the Board of Directors and the internal auditors reviews the adequacy and effectiveness of the internal control system and suggest the improvements to strengthen the same.

During the period under review, such controls were tested and no reportable weakness in their working has been discovered.

For Report on the Internal Financial Controls under clause (i) of sub-section 3 of Section 143 of the Company Act, 2013, members may refer to Annexure A to the Independent Auditor's Report, on the financial statements of the Company which forms part of this Annual Report.

18. DETAILS OF FRAUD REPORT BY AUDITOR:

During the financial year 2020-21, the Auditors has not reported any matter under Section 143 (12) of the Companies Act, 2013, therefore no detail is required to be disclosed under Section 134 (3) (ca) of the Act

19. SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES:

The Company does not have any subsidiary, joint venture or associate company as on 31st March, 2021. Further no company become or ceased as subsidiary, joint ventures or associate company during the year under review.

20. DEPOSITS:

During the year under review, your Company has not accepted any deposits within the meaning of Section 73 of the Companies Act, 2013 read with rules made there under and as such, no amount on account of principal or interest on deposits was outstanding as on the date of the balance sheet.

21. PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS BY COMPANY:

Details of loans, guarantees and investments, if any, covered under the provisions of section 186 of the Companies Act, 2013 form part of the notes to Financial Statements provided in this Annual Report.

22. PARTICULARS OF CONTRACTS OR ARRANGEMENT WITH RELATED PARTIES:

The Company has formulated a policy on related party transactions which is also available on the website of the Company.
Weblink: http://asiapackltd.com/Content/UPLOADED/media0921700102.pdf

This policy deals with the review and approval of related party transactions. The Board of Directors of the Company has approved the criteria to grant omnibus approval by the Audit Committee within the overall framework of the policy on related party transactions. Prior omnibus approval is obtained for related party transactions which are of repetitive nature and entered in the ordinary course of business and at arm's length. All related party transactions are placed before the Audit Committee for review and approval.

All the transactions / contracts / arrangements of the nature as specified in Section 188(1) of the Companies Act, 2013 entered by the Company during the year under review with related party(ies) are in the ordinary course of business and on arm's length basis. There are no material significant related party transactions made by the Company with Promoters, Directors, or Key Managerial Personnel which may have a potential conflict with the interest of the Company at large.

In view of the above, the requirement of giving particulars of contracts / arrangements / transactions made with related parties, in Form AOC-2 are not applicable for the year under review.

Members may refer to note no. 21 (VII) to the financial statement which sets out related party disclosures pursuant to Indian Accounting Standard-24.

23. DETAILS OF POLICY DEVELOPED AND IMPLEMENTED BY THE COMPANY ON ITS CORPORATE SOCIAL RESPONSIBILITY INITIATIVES:

The Company has not developed and implemented any Corporate Social Responsibility initiatives as the provisions of section 135 (1) of the Companies Act, 2013, are not applicable to the Company.

24. CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS AND OUTGO:

Disclosures pertaining to conservation of energy, technology absorption, foreign exchange earnings and outgo, are not applicable to your company during the year under review.

25. RISK MANAGEMENT POLICY:

As per Regulation 21 (5) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Risk Management committee is mandatorily applicable to top 1000 companies and your company do not fall under the same, hence the company is not required to constitute such committee; however, the Company has its own procedure for identifying the various business risks and seeks to create transparency, minimize adverse impact on the business objectives and enhance the Company's competitive advantage. The risk management system defines the risk management approach across the enterprise at various levels including documentation and reporting.

26. VIGIL MECHANISM / WHISTLE BLOWER POLICY:

The Company established a Whistle Blower Policy to deal with the cases of unethical behavior in all its business activities, fraud, mismanagement and violation of Code of Conduct of the Company. The policy provides systematic mechanism to report the concerns and adequate safeguards against the victimization if any.

The policy is available on the website of the Company.
Weblink: http://asiapackltd.com/Content/UPLOADED/media0921700105.pdf

During the year, no whistle blower event was reported and mechanism is functioning well. No personnel have been denied access to the Audit Committee.

27. SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS OR COURTS:

There are no significant and material orders passed by the Regulators/Courts/ Tribunals that would impact the going concern status of the Company and its future operations.

28. AUDITORS:

STATUTORY AUDITORS:

As per Section 139 of the Companies Act, 2013 read with the Companies (Audit and Auditors) Rules, 2014 the Members of the Company in 32nd Annual General Meeting approved the appointment of M/s Vinod Singhal & Co LLP., Chartered Accountants (Firm Registration Number: 005826C), as the Statutory Auditors of the Company for 5 years from the 32nd Annual General Meeting (AGM) till the conclusion of the 37th Annual General Meeting of the Company. Pursuant to amendments in Section 139 of the Companies Act, 2013, the requirements to place the matter relating to such appointment for ratification by members at every annual general meeting has been omitted with effect from May 7, 2018.

SECRETARIAL AUDITOR:

In terms of Section 204 of the Companies Act, 2013, the Board of Directors of the Company at their meeting held on 30th June, 2021 has appointed Mr. B. L. Harawat, Proprietor of M/s. B. L. Harawat & Associates, Practicing Company Secretary, (CP NO 3326) as the Secretarial Auditor for the Financial Year 2021-22, for auditing the secretarial and related records of the Company. The Company has received consent from Mr. B. L. Harawat, Proprietor of M/s. B. L. Harawat & Associates, Practicing Company Secretary, (CP NO 3326) to act as the Secretarial Auditor for auditing the secretarial and related records of the Company for the financial year ending 31st March, 2022.

COST AUDITOR:

No Cost Auditor was appointed during the financial year as there is no statutory requirement imposed for mandatorily according to the size and nature of the business.

29. EXPLANATION OR COMMENTS ON QUALIFICATIONS, RESERVATIONS OR ADVERSE REMARKS OR DISCLAIMERS MADE BY THE AUDITORS AND THE PRACTICING COMPANY SECRETARY IN THEIR REPORTS:

The Auditors' Report does not contain any qualification, reservation or adverse remark. The Report is enclosed with the financial statements in this Annual Report. As required by the Listing Regulations, Auditors certificate on corporate governance is enclosed as Annexure-2 to the Board's report. The Secretarial Auditors' Report does not contain any qualification, reservation or adverse remark. The Secretarial Auditors' Report is enclosed as Annexure-3 to the Board's report in this Annual Report.

30. COMPLIANCE WITH SECRETARIAL STANDARD:

During the year under review, the Company has complied with the provisions of the applicable Secretarial Standards issued by Institute of Companies Secretaries of India. The Directors have devised proper systems to ensure compliance with the provisions of all applicable Secretarial Standards and that such systems are adequate and operating effectively.

31. EXTRACT OF ANNUAL RETURN / WEB LINK / WEB ADDRESS OF ANNUAL RETURN:

The Annual Return of the Company as on March 31, 2021 is available on the Company's website and can be accessed at http://www.asiapackltd.com/Index/InvestorsView/22

32. COST RECORD:

The provision of Cost audit as per section 148 the Companies Act, 2013 doesn't applicable on the Company.

33. DISCLOSURE AS PER THE SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013:

The Company has zero tolerance on Sexual Harassment at workplace. During the year under review there were no cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

34. DETAILS OF APPLICATION MADE OR ANY PROCEEDING PENDING UNDER THE INSOLVENCY AND BANKRUPTCY CODE, 2016 (31 OF 2016) DURING THE YEAR ALONGWITH THEIR STATUS AS AT THE END OF THE FINANCIAL YEAR:

No application has been made under the Insolvency and Bankruptcy Code; hence the requirement to disclose the details of application made or any proceeding pending under the Insolvency and Bankruptcy Code, 2016 (31 of 2016) during the year alongwith their status as at the end of the financial year is not applicable.

35. OTHER DISCLOSURES:

The requirement to disclose the details of difference between amount of the valuation done at the time of onetime settlement and the valuation done while taking loan from the Banks or Financial Institutions along with the reasons thereof, is not applicable.

36. ACKNOWLEDGEMENT:

The Board of Directors wish to place on record its deep sense of appreciation for the committed services by all the employees of the Company. The Board of Directors would also like to express their sincere appreciation for the assistance and co-operation received from the financial institutions, banks, government and regulatory authorities, stock exchanges, customers, vendors, members and debenture holders during the year under review.

By Order of the Board of Directors
For **Asia Pack Limited**

	Sd/-	Sd/-
	Name: **Prakash Chandra Purohit**	Name: **Pushpendra Jain**
	Designation: **Director**	Designation: **Additional Director**
	DIN : **01383197**	DIN : **03228950**
Date: 12th August, 2021	Address: **Village-Uper Ki Oden, Teh- Nathdwara, Rajsamand, Rajasthan, India , PIN-313301**	Address: **8-9, Pragati Nagar, Shobhagpura, Udaipur, Rajasthan, India, PIN-313011**
Place: Nathdwara		

Annexure-1 to the Board's Report

PARTICULARS OF EMPLOYEES

[Pursuant to Section 197 (12) of the Companies Act, 2013 read with Companies (Appointment and Remuneration of Managerial Personnel), Rules, 2014]

a) Information as per Rule 5 (1) of Chapter XIII, Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014:

Sl. No.	Requirements	Disclosure	
1	The ratio of the remuneration of each director to the median remuneration of the employees of the company for the financial year:	Name of Director	Ratio
		Mr. Revant Purbia*	1.29
		Mr. Pushpendra Jain**	1.40
Note: Median Remuneration for the financial year 2020-21 is Rs. 4,25,586/-			
*Resigned from the office of Director cum CFO of the Company w.e.f. 31.01.2021			
**Appointed as an Additional Director cum CFO of the Company w.e.f. 01.02.2021			
2	The percentage increase in remuneration of each director, Chief Executive Officer, Company Secretary and Chief Financial Officer in the financial year:	Mr. Revant Purbia*	0.00%
		Mr. Pushpendra Jain@	N.A.
		Mr. Jitendra Purohit	9.45%
		Mr. Arpit Lodha#	N.A.
		Ms. Ankita Mata$	N.A.
*Mr. Revant Purbia resigned from the office of Director cum CFO of the Company w.e.f. 31.01.2021			
@Mr. Pushpendra Jain, appointed as an Additional Director cum CFO of the Company w.e.f. 01.02.2021; hence not applicable.			
#Mr. Arpit Lodha resigned as Company Secretary and Compliance Officer of the Company w.e.f. 31.07.2020; hence not applicable.			
$Ms. Ankita Mata appointed as Company Secretary and Compliance Officer of the Company w.e.f. 01.08.2020; hence not applicable.			

3	The percentage increase in the median remuneration of employees in the financial year:	2020-21	2019-20	Increase (%)
		4,25,586	6,59,532	(35.47%)
4	The number of permanent employees on the rolls of company:	There were 4 employee(s) as on March 31, 2021.		
5	Affirmation that the remuneration is as per the remuneration policy of the Company:	Yes, the Remuneration is as per the remuneration policy of the Company.		
b) Information as per Rule 5 (2) of Chapter XIII, the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014: Not Applicable				

By Order of the Board of Directors
For **Asia Pack Limited**

Sd/-
Name: **Prakash Chandra Purohit**
Designation: **Director**
DIN : **01383197**
Address: **Village-Uper Ki Oden, Teh- Nathdwara, Rajsamand, Rajasthan, India , PIN-313301**

Sd/-
Name: **Pushpendra Jain**
Designation: **Additional Director**
DIN : **03228950**
Address: **8-9, Pragati Nagar, Shobhagpura, Udaipur, Rajasthan, India, PIN-313011**

Date: 12th August, 2021
Place: Nathdwara

Annexure-2 to the Board's Report

AUDITORS CERTIFICATE ON CORPORATE GOVERNANCE
[Pursuant to schedule V Para-E of the Securities and Exchange Board of India (Listing Obligations and Disclosures Requirement) Regulations, 2015]

To,
The Members
Asia Pack Ltd,
3rd Floor, Miraj Campus, Uper ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

We have examined the compliance of conditions of Corporate Governance by **ASIA PACK LIMITED** (''the Company''), for the year ended on 31st March, 2021, as stipulated in Applicable Regulations of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the said Company with the Stock Exchanges.

The compliance of conditions of Corporate Governance is the responsibility of the Management.Our responsibility is limited to examining the procedures and implementation thereof, adopted by the Company for ensuring compliance with the conditions of the Corporate Governance. It is neither an audit nor an expression of opinion on the financial statements of the Company.

In our Opinion and to the best of our information and according to the explanations given to us, we certify that the Company has complied with the conditions of Corporate Governance as stipulated in Applicable Regulations of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the said Company with the Stock Exchanges.

We further state that such compliance 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 VINOD SINGHAL & CO. LLP
CHARTERED ACCOUNTANTS
FRN: 005826C/C400276
SD/-
FCA PRATEEK GOYAL
PARTNER
MEMBERSHIP NO: 411040
PLACE: UPER KI ODEN, NATHDWARA
DATE: 30.06.2021
UDIN: 21411040AAAACK6146

Annexure-3 to the Board's Report

FORM NO. MR-3

SECRETARIAL AUDIT REPORT

FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2021

[Pursuant to section 204(1) of the Companies Act, 2013 and rule No. 9 of the companies (Appointment and Remuneration Personnel) Rules, 2014]

To,
The Members,
Asia Pack Limited,
Registered Office:3rd Floor, Miraj Campus, Uper Ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

I, B. L. Harawat, proprietor of M/s. B. L. Harawat & Associates, Udaipur, have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by Asia Pack Limited (hereinafter called "the company") having CIN: L74950RJ1985PLC003275. Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my 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 in the conduct of secretarial audit during the lockdown situation across the country due to second wave of pandemic of COVID 19, I hereby report that in my opinion, the company has, during the audit period covering the financial year ended on March 31, 2021 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:

I have examined the books, papers, minute books, forms and returns filed and other records maintained by the Company for the financial year ended on 31st March, 2021 according to the provisions of:

(i) The Companies Act, 2013 (the Act) and the rules made there under;
(ii) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
(iii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
(iv) 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;
(v) 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, 2018 and amendments from time to time;
    (d) The Securities and Exchange Board of India (Share Based Employee Benefit) Regulation, 2014;
    (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
    (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;
    (h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
    (i) Securities and Exchange Board of India (Issue and Listing of Non-convertible and Redeemable Preference Shares) Regulations, 2013;
    (j) The Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015
(vi) Other laws applicable specifically to the Company, namely :
    (a) Labour Codes viz; Code on Wages, 2019, Industrial Relations Code, 2020, Social Security Code and Occupational Safety, Health and Working Conditions Code, 2020, recently introduced by the Govt. of India and Rules framed there under.
    (b) Other Laws viz; Income Tax Act, Goods and Services Act, 2017 to the extent applicable to the Company are being complied with by the company.

I have also examined compliance with the applicable clauses of the Secretarial Standards issued by The Institute of Company Secretaries of India, New Delhi.

During the period under review, the Company has complied with the applicable provisions of the Act, Rules, Regulations, Guidelines, Standards, etc. mentioned above to the extent applicable to the company.

I/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 including women director. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Act and Listing Regulations.

Adequate notice is given to all directors to schedule the Board Meetings, agenda and detailed notes on agenda were 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.

All the decisions at Board Meetings and Board Committee Meetings are carried out unanimously as recorded in the minutes of the meetings of Board of Directors of the Company or committee of the Board, as the case may be

I 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.

I further report that during the audit period the Company has:

(i) Passed a Special Resolution for Increase the borrowings power of the Company
(ii) Passed a Special Resolution for Creation of charges, mortgage, hypothecation on the immovable and movable properties of the company under section 180(1)(a) of the Companies Act, 2013
(iii) Passed a Special Resolution for Increase in the limits applicable for making investments / extending loans and giving guarantees or providing securities in connection with loans to persons / bodies corporate
(iv) The Company has not issued shares on Public / Right / Preferential basis. The company has not issued any debentures and or sweat equity, etc. during the year under report.
(v) The Company has not issued any debentures since its incorporation hence the question of redemption of debentures did not arise during the year. Further there has been no buy-back of securities in the Company during the year
(vi) There has been no proposal under consideration for Merger / amalgamation / reconstruction, etc.
(vii) The company has not entered into any foreign technical collaboration so far.
(viii) The company does not have any pending litigations in the court of Law for the time being.
(ix) During the course of our examination and according to the information and explanations given to us, no material fraud on or by the Company has been noticed or reported during the course of audit.
(x) Accepted resignation of Mr. Arpit Lodha from the post of Company Secretary and Compliance Officer with effect from 31st July, 2020.
(xi) Appointed Ms. Ankita Mata as Company Secretary and Compliance Officer with effect from 1st August, 2020
(xii) Accepted resignation of Mr. Revant Purbia (DIN: 02423236) from the office of Director cum Chief Financial Officer (CFO) of the company with effect from closure of business hours on 31st January, 2021
(xiii) Appointed Mr. Pushpendra Jain (DIN: 03228950) as an Additional Director (Executive-Professional) cum Chief Financial Officer (CFO) of the Company with effect from 01st February, 2021.

For **B. L. Harawat & Associates**
Company Secretaries
Sd/-
B. L. Harawat
Proprietor
M. No.: ACS6098
C.P. No.: 3326

Date: 16th July, 2021
Place: Udaipur
UDIN: A006098C000642217

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,
Asia Pack Limited,
3rd Floor, Miraj Campus, Uper Ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

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 the audit.
2. I 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. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required, I 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 is the responsibility of management. My 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 **B. L. Harawat & Associates**
Company Secretaries
Sd/-
B. L. Harawat
Proprietor
M. No.: ACS6098
C.P. No.: 3326

Date: 16th July, 2021
Place: Udaipur
UDIN: A006098C000642217

Management Discussion and Analysis Report

Global economy:

In response to disruptions from the global pandemic, many central banks in emerging market and developing economies employed asset purchase programs for the first time in their history. These programs were successful in lowering bond yields without triggering currency depreciations. Despite the pandemic, the global economy is set to expand by 5.6% in 2021, its strongest growth in 80 years. This recovery is uneven and largely reflects sharp rebounds in some major economies. The global outlook is subject to significant downside risks, including the possibility of additional COVID-19 waves and financial stress amid high debt levels of Emerging Market and Developing Economies (EMDEs). Policy makers will need to support the recovery while safeguarding price stability, fiscal sustainability and to continue efforts towards promoting growth-enhancing reforms.

Indian Economy:

India's GDP growth stands at 7.3 percent for financial year 2020-21 and the Reserve Bank of India's projections indicate a strong revival of the economy with GDP growth expected to be at 10.5 per cent for financial year 2021-22. This trend is already visible in quarterly GDP movement during 2020-21, with GDP moving from a contraction of 24 percent in Q1-21 to a growth of 1.6 per cent during Q4-21 despite the disruptions caused by the ongoing second wave of the pandemic. However, we need to review and monitor with great caution, the short-to-medium term impact of the second and a probable third wave of the pandemic while continuing to work on more efficient ways of tackling its economic impact.

Industry structure and developments:

Real estate sector is one of the most globally recognized sectors. It comprises of four sub sectors - housing, retail, hospitality, and commercial. The growth of this sector is well complemented by the growth in the corporate environment and the demand for office space as well as urban and semi-urban accommodations.

It is also expected that this sector will incur more non-resident Indian (NRI) investments in both the short term and the long term.

Opportunities:

1. Implement the new technologies in an effective way.
2. Weakening of the competition.
3. Strategic real estate visibility.
4. An effective use of the new ways of communication.
5. International real estate strategy.

Threats:

1. Take on high levels of risk.
2. Changes of the real estate positioning environment.
3. Changes in the real estate market.
4. Changes of the potential buyers´ preferences.
5. Eventual legal modifications.

The applicability of this model will depend on the particular necessities of every real estate, but it can also be used for:

1. Exploring possible solutions to different problems.
2. Detecting which are the weaknesses of the real estate.
3. Increasing the individual and collective level of productivity.
4. Taking more accurate decisions.
5. Modifying strategies.
6. Discovering new opportunities of this business.
7. Strengthening individual and collective abilities.
8. Managing the real estate´s resources in a better way.
9. Speeding up the internal and external managing processes.
10. Getting to the potential clients in a more effective way.

Segment–wise or product-wise performance:

The Board has clearly mentioned the performance of product-wise service in Point VI of Note 23: Additional and other information of the Financial Statement.

Outlook:

As the real estate sector continues to tackle the existing issues created by the aftershocks of the liquidity crisis and resulting disruption of COVID19, we see an opportunity for well established players in the industry. The start of FY2021 may be muted due to the lockdown and subsequent impact on economy, but we believe our strong project pipeline and healthy balance sheet will help maintain operational performance going ahead. The pace of consolidation in the sector is also expected to accelerate further and we expect to gain market share. Also, amidst CODIV19 and prevailing liquidity crunch, the visibility on business development is getting stronger and we hope to add several projects to our portfolio in FY2021. Our focus on real estate market, strong brand and existing portfolio leaves us on a strong foot to take advantage of this opportunity.

By Order of the Board of Directors
For **Asia Pack Limited**

	Sd/-	Sd/-
	Name: **Prakash Chandra Purohit**	Name: **Pushpendra Jain**
	Designation: **Director**	Designation: **Additional Director**
	DIN : **01383197**	DIN : **03228950**
Date: 12th August, 2021	Address: **Village-Uper Ki Oden, Teh- Nathdwara, Rajsamand, Rajasthan, India , PIN-313301**	Address: **8-9, Pragati Nagar, Shobhagpura, Udaipur, Rajasthan, India, PIN-313011**
Place: Nathdwara		

REPORT ON CORPORATE GOVERNANCE

1. INTRODUCTION

Corporate governance essentially is the system of structures, processes rights, duties and obligations by which companies are directed and controlled. This governance structure specifies the distribution of rights and responsibilities among different participants in the corporation (such as the board of directors, management, shareholders, creditors, auditors, regulators and other stakeholders) and specifies the rules and procedures for making decisions in corporate affairs. This is reflected in the Company's philosophy on Corporate Governance. The Report has been prepared in accordance with the requirements laid down under Companies Act, 2013, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and with a view to meticulously attain standards of governance.

2. COMPANYS' PHILOSOPHY ON CORPORATE GOVERNANCE:

Corporate Governance ensures fairness, transparency and integrity of the management. As a part of its growth strategy, the Company believes in adopting the 'best practices' that are followed in the area of Corporate Governance in India. The Company emphasizes the need for transparency and accountability in all its transactions, in order to protect the interests of its stakeholders. The Company has set itself the objective of expanding its capacities and becoming competitive in its business. As a part of its growth strategy, it is committed to ethics and integrity in its business dealings that avoids conflict of interest. In order to conduct business with these principles, the Company has created a corporate structure based on business needs and maintains transparency through regular disclosures with a focus on adequate control systems.

3. BOARD OF DIRECTORS:

a) COMPOSITION OF THE BOARD

The Board of Directors ("the Board") is at the core of the Company's Corporate Governance practices and oversees how management serves and protects the long-term interests of its stakeholders. It brings in strategic guidance, leadership and independent view to the Company's Management while discharging its fiduciary responsibilities, thereby, ensuring that Management adheres to good standards of ethics, transparency and disclosures.

Our policy towards the composition of Board is to have an appropriate mix of Executive, Non-Executive, Women and Independent Directors, representing a judicious mix of professionalism, diversity and wide spectrum subject to specific competence in areas critical to the organization, knowledge and experience. This helps to drive value-based guidance whilst maintaining the independence of the Board and to separate its function of Governance and Management.

As on date of this Report, the Board consists of 4 (Four) Directors comprising of one Executive Director, Two Non-Executive Independent Directors and One Non-Executive Non Independent Director who provide valuable guidance to the Management of the Company on various aspects of the Company's business operations. The composition of the Board represents an optimal mix of professionalism, knowledge and experience and enables the Board to discharge its responsibilities and provide effective leadership to the business. The board does not have the full time chairman and the position of CEO and CFO are held by two different persons. The Company Secretary and Compliance Officer of the Company act as the advisor on all the compliance issues and ensures that best corporate governance at all the level is established. There is no inter-se relationship between members of the Board and Key Managerial Personnel of the Company. No shares were held in the Company by non-executive Directors.

The Company has issued formal letters of appointment to Independent Directors in the manner as provided in the Companies Act, 2013 and the terms and conditions of such appointment is disclosed on the website of the Company.

The size and composition of the Board conforms to the requirements of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (hereinafter referred as 'Listing Regulations' in this report) and the Companies Act, 2013. Other details relating to the Directors as on March 31, 2021 are as follows:

Name of the Director	Position held in the Company [Category]	Directorship in Other Companies*	Membership of the Committee in Companies	Chairmanship of the Committee in Companies
Mr. Prakash Chandra Purohit (DIN: 01383197)	Non-Executive -Non Independent Director	3	2	1

Mr. Pushpendra Jain (DIN: 03228950)	Executive-Additional Director and CFO	1	-	-
Mr. Sunil Upadhayay (DIN: 06767593)	Non-Executive - Independent Director	3**	5	3
Mrs. Prabhjeet Kaur (DIN: 07136767)	Non-Executive - Independent Director	1	3	3

*Excluding Asia Pack Limited

**Name of Listed Company: S V TRADING AND AGENCIES LIMITED-Non-Executive - Independent Director

b) ATTENDANCE OF DIRECTOR AT THE MEETING OF BOARD OF DIRECTORS AND THE LAST ANNUAL GENERAL MEETING:

Total Five (5) Board Meetings were held during the year under reviews and the gap between two meetings did not exceed one hundred and twenty days. The necessary quorum was present for all the meetings. Disclosure as required by secretarial standard 1 (SS-1) related to Dates of Meetings held during the financial year and number of Meetings attended by each Director are given below:

Date of Board Meetings	**Attendance of Directors in the Meeting of Board held during the year 2020-21**				
	Mr. Prakash Chandra Purohit	Mr. Revant Purbia*	Mr. Pushpendra Jain#	Mr. Sunil Upadhayay	Mrs. Prabhjeet Kaur
06.06.2020	Yes	Yes	N.A.	Yes	Yes
31.07.2020	Yes	Yes	N.A.	Yes	Yes
24.08.2020	Yes	Yes	N.A.	Yes	Yes
10.11.2020	Yes	Yes	N.A.	Yes	Yes
31.01.2021	Yes	Yes	N.A.	Yes	Yes
*Mr. Revant Purbia has resigned from the post of Director cum CFO of the Company with effect from 31.01.2021. #Mr. Pushpendra Jain is appointed as an Additional Director cum Chief Financial Officer of the Company w.e.f. 01.02.2021					

The attendance of the Directors in the 35th Annual General Meeting of the Company is given below:

Date of Annual General Meeting	**Attendance of Directors in the Annual General Meeting of the Company**			
	Mr. Prakash Chandra Purohit	Mr. Revant Purbia	Mr. Sunil Upadhayay	Mrs. Prabhjeet Kaur
30.09.2020	No	Yes	Yes	Yes

c) SKILLS / EXPERTISE / COMPETENCIES OF THE BOARD OF DIRECTORS

The following is the list of core skills / expertise / competencies identified by the Board of Directors as required in the context of the Company's business and that the said skills are available with the Board Members:

Skills / Expertise / Competence	Mr. Prakash Chandra Purohit	Mr. Revant Purbia*	Mr. Sunil Upadhayay	Mrs. Prabhjeet Kaur	Mr. Pushpendra Jain#
Leadership qualities	✓	✓	✓	✓	✓
Industry knowledge and experience	✓	✓	✓	✓	✓
Experience and exposure in policy shaping and industry advocacy	✓	✓	✓	✓	✓
Understanding of relevant laws, rules, regulations and policies	✓	✓	✓	✓	✓
Corporate governance	✓	✓	✓	✓	✓
Financial expertise	✓	✓	✓	✓	✓
Risk Management	✓	✓	✓	✓	✓
*Mr. Revant Purbia has resigned from the post of Director cum Chief Financial Officer of the Company w.e.f. 31.01.2021. # Mr. Pushpendra Jain is appointed as an Additional Director cum Chief Financial Officer of the Company w.e.f. 01.02.2021					

4. MEETING OF INDEPENDENT DIRECTORS:

Independent Directors of the Company met on 11th November, 2020 during the year under review to discuss the following matters:

- Review the performance of the non-independent Director and the board as whole.
- Review the performance of the chairperson of the Company, taking into account views of the Executive Director and Non-Executive Directors
- Assess the quality, quantity and timeliness of the flow of the information between the Company management and the board that is necessary for the board to effectively and reasonably perform the duties.

In compliance with the requirements of the act and the regulations, the Company has put in place a familiarization for the Independent Directors to familiarize them with their role, rights, and responsibility as directors, the working of the Company, nature of the industry in which the Company operates, business model etc. The details of such familiarization programmes imparted to Independent Directors are posted on the website of the Company.

Weblink:http://www.asiapackltd.com/Content/UPLOADED/Familiarization-Programme-for-Independent-Directors-APL.pdf

None of the Independent Directors resigned during the year 2020-2021.

The Company has received declarations from all the Independent Directors of the Company confirming that:

i. they meet the criteria of independence prescribed under the Act and the Listing Regulations and

ii. they have registered their names in the Independent Directors' Databank.

5. AUDIT COMMITTEE:

a) TERMS OF REFERENCE:

The role of the Audit Committee shall include the following:

1. Oversight of the Company's financial reporting process and the disclosure of its financial information to ensure that the financial statement is correct, sufficient and credible;
2. Recommendation for appointment, remuneration and terms of appointment of auditors of the Company;
3. Approval of payment to statutory auditors for any other services rendered by the statutory auditors;
4. Reviewing, with the management, the annual financial statements and auditor's report thereon before submission to the Board for approval, with particular reference to:

    a) Matters required to be included in the Director's Responsibility Statement to be included in the Board's report in terms of clause (c) of subsection 3 of section 134 of the Companies Act, 2013
    b) Changes, if any, in accounting policies and practices and reasons for the same
    c) Major accounting entries involving estimates based on the exercise of judgment by management
    d) significant adjustments made in the financial statements arising out of audit findings
    e) Compliance with listing and other legal requirements relating to financial statements
    f) Disclosure of any related party transactions
    g) Qualifications in the draft audit report
5. Reviewing, with the management, the quarterly financial statements before submission to the Board for approval;
6. Reviewing, with the management, the statement of uses/application of funds raised through an issue (public issue, rights issue, preferential issue, etc.), the statement of funds utilized for purposes other than those stated in the offer document/prospectus/notice and the report submitted by the monitoring agency monitoring the utilisation of proceeds of a public or rights issue, and making appropriate recommendations to the Board to take up steps in this matter;
7. Review and monitor the auditor's independence and performance, and effectiveness of audit process;
8. Approval or any subsequent modification of transactions of the Company with related parties;
9. Scrutiny of inter-corporate loans and investments;
10. Valuation of undertakings or assets of the Company, wherever it is necessary;
11. Evaluation of internal financial controls and risk management systems;
12. Reviewing, with the management, performance of statutory and internal auditors, and adequacy of the internal control systems;
13. Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit;
14. Discussion with internal auditors of any significant findings and follow up there on;

15. Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the Board;
16. Discussion with statutory auditors before the audit commences, about the nature and scope of audit as well as post-audit discussion to ascertain any area of concern;
17. To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders (in case of non-payment of declared dividends) and creditors;
18. To review the functioning of the whistle blower mechanism
19. Approval of appointment of CFO (i.e., the whole time Finance Director or any other person heading the finance function or discharging that function) after assessing the qualifications, experience and background, etc. of the candidate;
20. Carrying out any other function as is mentioned in the terms of reference of the Audit Committee.
21. The Audit Committee shall have authority to investigate into any matter in relation to the items specified in section 177(4) of Companies Act, 2013 or referred to it by the Board and for this purpose shall have power to obtain professional advice from external sources and have full access to information contained in the records of the Company.
22. The Auditors of a Company and the Key Managerial Personnel shall have a right to be heard in the meetings of the Audit Committee when it considers the auditor's report.
23. Review the management discussion and analysis of financial condition and results of operations;
24. Review the statement of significant related party transactions (as defined by the Audit Committee), submitted by management;
25. Review the management letters/letters of internal control weaknesses issued by the statutory auditors;
26. Review the internal audit reports relating to internal control weaknesses; and
27. The appointment, removal and terms of remuneration of the chief internal auditor shall be subject to review by the Audit Committee.
28. Review the:

    (a) quarterly statement of deviation(s) including report of monitoring agency, if applicable, submitted to stock exchange(s) in terms of Regulation 32(1).
    (b) annual statement of funds utilized for purposes other than those stated in the offer document/ prospectus/notice in terms of Regulation 32(7).

b) THE COMPOSITION, NAMES OF MEMBERS AND CHAIRPERSON OF THE AUDIT COMMITTEE:

The Composition of the Audit Committee as on 31st March, 2021 is as follows:

S. No.	Composition	Designation in Committee / Category
1	Mrs. Prabhjeet Kaur (DIN: 07136767)	Chairman / Independent–Non Executive
2	Mr. Sunil Upadhayay (DIN: 06767593)	Member / Independent–Non Executive
3	Mr. Prakash Chandra Purohit (DIN: 01383197)	Member / Professional–Non Executive

c) PARTICULARS OF THE MEETINGS AND ATTENDANCE OF THE MEMBERS DURING THE YEAR ARE AS FOLLOWS:

Total Four (4) Audit Committee Meetings were held during the year under reviews and the gap between two meetings did not exceed one hundred and twenty days. The necessary quorum was present in all the meetings.

Disclosure as required by secretarial standard 1 (SS-1) related to dates of Meetings held during the financial year and number of Meetings attended by each Director are given below:

Date of Meeting(s)	Attendance in the Meeting(s) held during the year 2020-21		
	Mrs. Prabhjeet Kaur (DIN: 07136767)	Mr. Sunil Upadhayay (DIN: 06767593)	Mr. Prakash Chandra Purohit (DIN: 01383197)
06.06.2020	Yes	Yes	Yes
31.07.2020	Yes	Yes	Yes
10.11.2020	Yes	Yes	Yes
31.01.2021	Yes	Yes	Yes

The Company Secretary and Compliance Officer of the Company attends the Audit Committee meetings and act as the secretary to the Committee and advices on compliances with applicable laws and governance.

6. NOMINATION AND REMUNERATION COMMITTEE:

The nomination and remuneration committee of the Company is constituted in line with the provisions of Regulation 19 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Section 178 of the Companies Act, 2013.

a) TERMS OF REFERENCE:

The terms of reference of the committee, inter alia, include the following:

1. Formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the Board of Directors a policy relating to, the remuneration of the directors, key managerial personnel and other employees;
2. Formulation of criteria for evaluation of performance of independent directors and the Board of Directors;
3. Devising a policy on diversity of Board of Directors;
4. Identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the Board of Directors their appointment and removal.
5. Consider extension or continuation of the term of appointment of the independent director on the basis of the report of performance evaluation of Independent Directors.
6. Any other work and policy, related and incidental to the objectives of the committee as per provisions of the Act and rules made there under & the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

b) THE COMPOSITION, NAMES OF MEMBERS AND CHAIRPERSON OF THE NOMINATION AND REMUNERATION COMMITTEE:

The Composition of the Nomination and Remuneration Committee as on 31st March, 2021 is as follows:

S. No.	Composition	Designation in Committee / Category
1	Mr. Sunil Upadhayay (DIN: 06767593)	Chairman / Independent–Non Executive
2	Mrs. Prabhjeet Kaur (DIN: 07135767)	Member / Independent–Non Executive
3	Mr. Prakash Chandra Purohit (DIN: 01383197)	Member / Professional–Non Executive

c) PARTICULARS OF THE MEETINGS AND ATTENDANCE OF THE MEMBERS DURING THE YEAR ARE AS FOLLOWS:

Total Two (2) Nomination and Remuneration Committee Meetings was held during the year. Disclosure as required by secretarial standard 1 (SS-1) related to dates of Meetings held during the financial year and number of Meetings attended by each Director are given below:

Date of Meeting(s)	Attendance in the Meeting(s) held during the year 2020-21		
	Mr. Sunil Upadhayay (DIN: 06767593)	Mrs. Prabhjeet Kaur (DIN: 07136767)	Mr. Prakash Chandra Purohit (DIN: 01383197)
31.07.2020	Yes	Yes	Yes
31.01.2021	Yes	Yes	Yes

The Company Secretary and Compliance Officer of the Company attends the Nomination and Remuneration Committee meetings and acts as the secretary to the Committee and advices on compliances with applicable laws and governance.

d) PERFORMANCE EVALUATION CRITERIA FOR INDEPENDENT DIRECTORS:

Pursuant to the provisions of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, a separate exercise was carried out to evaluate the performance of individual Directors including the Chairman of the Board who were evaluated on parameters such as level of engagement and contribution and independence of judgment thereby safeguarding the interest of the Company.

The performance evaluation of the Independent Directors was carried out by the entire Board. The performance evaluation of the Chairman and the Non Independent Directors was carried out by the Independent Directors. The board also carried out annual performance evaluation of the working of its Audit, Nomination and Remuneration as well as stakeholder relationship committee. The Directors expressed their satisfaction with the evaluation process.

7. STAKEHOLDERS RELATIONSHIP COMMITTEE:

In compliance with the provisions of Section 178 of the Companies Act, 2013 & Regulation 20 of the listing regulations, the Board has constituted the Stakeholders Relationship Committee.

The Stakeholders Relationship Committee considers and resolves the grievances of the security holders of the Company including but not limited to complaints related to transfer of shares non receipt of annual report and non-receipts of dividend, if any.

a) THE COMPOSITION, NAMES OF MEMBERS, CHAIRPERSON, AND PARTICULARS OF THE MEETINGS AND ATTENDANCE OF THE MEMBERS DURING THE YEAR ARE AS FOLLOWS:

The Composition of the Stakeholders Relationship Committee as on 31st March, 2021 is as follows:

S. No.	Composition	Designation in Committee / Category
1	Mr. Prakash Chandra Purohit (DIN: 01383197)	Chairman / Professional–Non Executive
2	Mrs. Prabhjeet Kaur (DIN: 07135767)	Member / Independent–Non Executive
3	Mr. Sunil Upadhayay (DIN: 06767593)	Member / Independent–Non Executive

b) NAME AND DESIGNATION OF THE COMPLIANCE OFFICER:

Name: Mr. Arpit Lodha*
Designation: Company Secretary and Compliance Officer

Name: Ms. Ankita Mata**
Designation: Company Secretary and Compliance Officer

*Mr. Arpit Lodha resigned from the post of Company Secretary and Compliance Officer w.e.f. 31st July, 2020. Thereafter, **Ms. Ankita Mata was appointed as Company Secretary and Compliance Officer of the Company w.e.f 1st August, 2020.

c) STAKEHOLDERS RELATIONSHIP COMMITTEE MEETINGS:

Total One (01) Shareholders / Investors Grievance Committee / Stakeholders Relationship Committee Meetings were held during the year. Disclosure as required by secretarial standard 1 (SS-1) related to dates of Meetings held during the financial year and number of Meetings attended by each Director are given below:

Date of Meeting(s)	Attendance in the Meeting(s) held during the year 2020-21		
	Mr. Prakash Chandra Purohit (DIN: 01383197)	Mrs. Prabhjeet Kaur (DIN: 07136767)	Mr. Sunil Upadhayay (DIN: 06767593)
10.11.2020	Yes	Yes	Yes

d) DETAILS OF INVESTOR COMPLAINTS RECEIVED AND REDRESSED DURING THE YEAR 2020-21 ARE AS FOLLOWS:

Opening Balance	Received during the year	Resolved during the year	Pending Complains
Nil	Nil	Nil	Nil

8. REMUNERATION OF DIRECTORS:

a) NON-EXECUTIVE DIRECTORS (INCLUDING INDEPENDENT DIRECTORS):

No remuneration has been paid to the Non-Executive Directors during the year under review.

Non-Executive Directors (including Independent Directors) may be paid a sitting fee as may be decided by the Board for every meeting of the board or committee thereof attended by them as member. No sitting fees is being presently paid to the Non-Executive Independent Director.

Non-Executive Directors (excluding Independent Directors) may be paid commission upto an aggregate amount not exceeding 1% of the net profits of the company for the year. The payment of commission shall be based on their attendance at the board and the committee meetings as member.

Additional commission, apart from commission referred to above, may be paid to non-executive directors (excluding Independent Directors) as may be decided by the board of directors of the company from time to time, depending on the extra time and effort as may be devoted and contribution as may be made by the non-executive directors.

The company has no stock options plans and no payment by way of bonus, pension, incentives etc. shall be paid.

b) KEY MANAGERIAL PERSONNEL & OTHER EMPLOYEES:

The objective of the policy is directed towards having a compensation philosophy and structure that will reward and retain talent. The Remuneration to Managing Director, if any, shall take into account the Company's overall performance, MD's contribution for the same & trends in the industry in general, in a manner which will ensure and support a high performance culture.

The company has no stock options, plans and hence, such instruments do not form part of his remuneration package.

The Remuneration to others will be such as to ensure that the relationship of remuneration to performance is clear and meets appropriate performance benchmarks.

9. FORMULATION OF POLICY FOR SELECTION AND APPOINTMENT OF DIRECTORS AND THEIR REMUNERATION / REMUNERATION OF DIRECTORS:

The Nomination and Remuneration Committee discussed and thereafter decided upon the policy for selection of appointment of directors and their remuneration. The highlights of this policy are as follows:

a) CRITERIA FOR SELECTION OF DIRECTORS (INCLUDING INDEPENDENT DIRECTORS):

A Directors including Independent director shall possess appropriate skills, experience and knowledge in one or more fields of finance, law, management, sales, marketing, administration, research, corporate governance, operations or other disciplines related to the company's business.

The Nomination and Remuneration Committee shall have discretion to consider and fix any other criteria or norms for selection of the most suitable candidate(s).

b) POSITIVE ATTRIBUTES OF DIRECTORS (INCLUDING INDEPENDENT DIRECTORS):

A Directors including independent director shall be a person of integrity, who possesses relevant expertise and experience and who shall uphold ethical standards of integrity and probity; act objectively and constructively; exercise his responsibilities in a bona-fide manner in the interest of the company; devote sufficient time and attention to his professional obligations for informed and balanced decision making; and assist the company in implementing the best corporate governance practices.

To act within their authority, assist in protecting the legitimate interests of the Company, its shareholders and employees. An Independent director should meet the requirements of the Companies Act, 2013 and Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 concerning independence of directors.

c) CRITERIA FOR APPOINTMENT OF KMP/SENIOR MANAGEMENT:

- To possess the required qualifications, experience, skills and expertise to effectively discharge their duties and responsibilities.
- To practice and encourage professionalism and transparent working environment.
- To build teams and carry the team members along for achieving the goals/objectives and corporate mission.
- To adhere strictly to code of conduct.

d) DETAILS OF REMUNERATION TO ALL THE DIRECTORS PAID DURING THE FINANCIAL YEAR 2020-2021:

Sl. No.	Particulars of Remuneration	Name of Director	
	Name	Revant Purbia#	Pushpendra Jain##
	Designation	Director cum CFO	Director cum CFO
1	Gross salary	7,04,340	99,280

	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	7,04,340	99,280
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	-	-
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	-	-
2	Stock Option	-	-
3	Sweat Equity	-	-
4	Commission		
	- as % of profit	-	-
	- others, specify	-	-
5	Others, please specify	-	-
	Total	**7,04,340**	**99,280**
#Resigned from the office of Director cum Chief Financial Officer w.e.f. 31.01.2021			
##Appointed as an Additional Director cum Chief Financial Officer of the Company w.e.f. 01.02.2021			

e) FIXED COMPONENT / PERFORMANCE LINKED INCENTIVE / CRITERIA:

Remuneration to Directors, Key Managerial Personnel and Senior Management may involve a balance between fixed and incentive, if any, pay reflecting short and long term performance objectives appropriate to the working of the Company and its goals.

f) SERVICE CONTRACT / NOTICE PERIOD / SEVERANCE FEES:

Services of the CEO, CFO and Executive Director(s), as the case may be terminated by either party, giving the other party one months' notice or the Company paying one months' salary in lieu thereof. There is no separate provision for payment of severance fees.

g) STOCK OPTION:

The Company is not having stock option scheme therefore the same is not applicable.

The above criteria and policy are subject to review by the Nomination and Remuneration committee and the Board of Directors of the Company.

10. GENERAL BODY MEETINGS:

The Details of Annual General Meetings held in last three years are as under:

Year ended	Date and Time	Location(s)	No. of special resolutions passed	Detail of special resolutions passed
31st March, 2018	24th September 2018 at 11.00 A.M.	Miraj Auditorium, 2nd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301	NIL	N.A.
31st March, 2019	27th August, 2019 at 11.00 A.M.		2	1. Re-appointment of Mr. Kulbir Singh Pasricha (DIN: 06767577) as Independent Director of the Company 2. Re-appointment of Mr. Sunil Upadhayay (DIN: 06767593) as Independent Director of the Company
31st March, 2020	30th September, 2020 at 11.00 A.M.	Held through Video Conferencing / Other Audio Visual Means	3	1. Increase the Borrowings Power of Company. 2. Creation of Charges, Mortgage, Hypothecation, on the Immovable Properties and Movable Properties of the Company under Section 180(1)(A) of the Companies Act, 2013. 3. Consent of Members for increase in the limits applicable for making investments / extending loans and giving guarantees or providing securities in connection with loans to persons/ Bodies Corporate

11. MEANS OF COMMUNICATION:

i. Results: The Company's quarterly / half yearly / annual financial results are sent to the Stock Exchanges and generally published in Financial Express (English) and Jai Rajasthan (Hindi).

ii. Website: The financial results are posted on the Company's website viz. http://www.asiapackltd.com/

Weblink: http://www.asiapackltd.com/Index/InvestorsView/9.

iii. News Release, Presentation etc.: Official news releases and official media releases if any are sent to Stock Exchanges as well as posted to the above website of the Company.

iv. The presentations made to institutional investors or to the analysts, if any, are also posted on the Company's website.

v. Management discussion and analysis report forms part of the Annual Report, which is send to the shareholders of the Company.

vi. The quarterly results, shareholding pattern, quarterly compliances and all other corporate communication to the Stock Exchange viz. BSE Limited is filled electronically. The Company has complied with filing submission through BSE Listing Centre.

vii. A separate dedicated section "Investors" gives the information on full Annual Report, Shareholding Pattern and Corporate Governance Report, etc. are also available on the Company's website in a user-friendly manner.

12. GENERAL SHAREHOLDER INFORMATION:

a.	**36th Annual General Meeting**	
	Day	Thursday
	Date	30th September, 2021
	Time	11:00 A.M.
	Venue [Registered Office]	3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301
b.	Financial Year	01st April 2020 to 31st March, 2021
c.	Date of Book Closure	Friday, 24th September, 2021 to Thursday, 30th September, 2021 (both days inclusive)
d.	Dividend Payment Date	No dividend proposed to be declared / paid for Financial Year
e.	Listing on Stock Exchange Name and Address and payment of listing fee	The equity shares of the Company are currently listed with BSE Limited (BSE), 25th Floor, PJ Towers, Dalal Street, Mumbai, Maharashtra, India, PIN- 400001. Annual Listing Fees, as applicable, have been paid to the BSE.
f.	Scrip Code	530899
g.	ISIN	INE784M01016
h.	Corporate Identity Number (CIN)	L74950RJ1985PLC003275
i.	Market Price Data: High, Low during each month in the financial year 2020-21	As per Table 1
j.	Performance in comparison to broad-based indices such as BSE Sensex, CRISIL index etc.	Company's shares are not actively traded and accordingly comparison with broad based indices such as BSE Sensex, CRISIL index etc. is not made.
k.	Registrar and Transfer Agents	**Bigshare Services Private Limited,** **Head Office:** 1st Floor, Bharat Tin Works Building, Opp. Vasant Oasis, Makwana Road, Marol, Andheri East, Mumbai 400059. Telephone No.: 022 – 62638200, 62638222 E-mail: investor@bigshareonline.com Website: www.bigshareonline.com

		Branch Office: 302 Kushal Bazar, 32-33, Nehru Place, New Delhi-110019 Telephone No.: 011-42425004 Contact Person: Mr. Mukesh Kumar, E-mail: bssdelhi@bigshareonline.com Website: www.bigshareonline.com
l.	Share Transfer System	The Company's shares being in compulsory demat list, are transferable through the depository system. However, shares in the physical form are processed by the Registrar and Share Transfer Agents, and approved by the Stakeholders Relationship Committee. Bigshare Services Private Limited acts as the Share Transfer Agent (STA) for physical as well as for electronic segments.
m.	Distribution of Shareholding & category-wise distribution	As per Table 2 & 3
n.	Dematerialisation of shares and liquidity	As per Table 4
o.	Outstanding global depository receipts (GDRs) or american depository receipts (ADRs)or warrants or any convertible instruments, conversion date and likely impact on equity	As on date, the Company has not issued GDRs, ADRs or any other Convertible Instruments and as such, there is no impact on the equity share capital of the Company.
p.	Commodity Price Risk / Foreign Exchange Risk and Hedging activities	Company is not dealing in commodities nor exposed to foreign exchange risk as there is no import and export transactions entered into by the Company.
q.	Plant Location	The Company is presently engaged in real estate business and does not have any manufacturing plants.
r.	Address for correspondence	**For Shares held in Physical form** Please refer point no. (k) mentioned above **For Shares/Debentures held in Demat form** Investors' concerned Depository Participant(s) and / or Bigshare Services Private Limited at their address given at point no. (k). **Any query on the Annual Report:** Ms. Ankita Mata, Company Secretary and Compliance Officer, Asia Pack Limited, 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301 E-mail ID: cs@mirajgroup.in / ankita.mata@mirajgroup.in Website: www.asiapackltd.com
s.	List of all credit ratings obtained by the entity along with any revisions thereto during the relevant financial year, for all debt instruments of such entity or any fixed deposit programme or any scheme or proposal of the listed entity involving mobilization of funds, whether in India or abroad	Not Applicable

Table 1: Market price data:

High, Low during each month in the financial year 2020-21: **(In Rs.)**

Month & Year	Bombay Stock Exchange Limited (BSE)	
	High	Low
April, 2020	18.55	18.45
May, 2020	18.45	18.45
June, 2020	20.15	19.15
July, 2020	18.20	14.90
August, 2020	17.60	14.55
September, 2020	17.90	17.00
October, 2020	17.50	17.50
November, 2020	18.05	18.05
December, 2020	18.70	16.35
January, 2021	19.80	18.05
February. 2021	20.60	17.85
March, 2021	17.65	16.50

Note: The above figures are of monthly high and low of closing quotation of Equity Shares of the Company.

There is no trading in shares of the company in the month of May 20, hence closing data related to previous month were considered for calculation of high low price.

Table 2: Distribution of shareholding as on 31st March, 2021:

No. of Shares	Share Holders Number	% to total no. of Shareholders	Total Shares	% to total share capital
Upto 500	848	81.77	159570	6.05
501-1000	78	7.52	63981	2.42
1001-2000	50	4.82	80269	3.04
2001-3000	11	1.06	27128	1.03
3001-4000	7	0.68	27340	1.04
4001-5000	6	0.58	27955	1.06
5001-10000	16	1.54	144177	5.47
10001-& Above	21	2.03	2107000	79.89
Total	**1037**	**100%**	**2637420**	**100%**

Table 3: Category-wise distribution of shareholding as on 31st March, 2021:

Category	Total Shareholders	% of Shareholders	No. of Shares held	% to Total Shares
Promoters	2	0.20%	1467990	55.66%
Nationalised Banks	3	0.29%	19800	0.75%
Mutual Fund	1	0.09%	100	0.00%
Bodies Corporate	25	2.41%	362027	13.73%
Clearing Member	1	0.10 %	238	0.01
Non Resident Indian	2	0.19%	1300	0.05%
Public	1003	96.72%	785965	29.80%
TOTAL	**1037**	**100.00%**	**2637420**	**100.00%**

Table 4: Break-up of shares in physical & electronic mode as on 31st March, 2021:

The company has admitted its shares for dematerialization with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) vide ISIN INE784M01016 as detailed below as on 31st March, 2021.

NSDL		CDSL		PHYSICAL		TOTAL	
No. of shares	% of capital	No. of shares	% of capital	No. of shares	% of capital	No. of shares	% of capital
1842284	69.85%	233846	08.87%	561290	21.28	2637420	100.00

13. AFFIRMATIONS AND OTHER DISCLOSURES:

a. Related Party Transactions

Your Company has formulated a policy on related party transactions which is also available on Company's website.
Weblink: http://www.asiapackltd.com/Content/UPLOADED/media0921700102.pdf

This policy deals with the review and approval of related party transactions. The Board of Directors of the Company has approved the criteria to grant omnibus approval by the Audit Committee within the overall framework of the policy on related party transactions. Prior omnibus approval is obtained for related party transactions which are of repetitive nature and entered in the ordinary course of business and at arm's length.

All related party transactions are placed before the Audit Committee for review and approval. All related party transactions entered during the year under review were in ordinary course of the business and were on an arm's length basis. In terms of the Act, there were no material significant related party transactions made by the Company with Promoters, Directors, or Key Managerial Personnel which may have a potential conflict with the interest of the Company at large.

Members may please note that based on the criteria as mentioned in Regulation 23 of SEBI (LODR) Regulations, 2015, transactions entered into by the Company with some of Related Party/ies for the Financial Year 2020-2021 are "Material" and the value of which either singly or all taken together exceeds ten percent of the annual consolidated turnover of the Company as per audited financial statements of Financial Year 2019-2020 and therefore requires ratification of the said transactions by the Members of the Company by Ordinary Resolutions and the Board of Directors of the Company recommends the Ordinary Resolution as set out at Item No. 5 in the accompanying Notice for ratification of Related Party Transactions by the Members of the Company.

Members may refer to note no. 21 (VII) to the financial statement which sets out related party disclosures pursuant to Indian Accounting Standard-24.

b. Details of non-compliance by the company, penalties, strictures imposed on the company by Stock Exchange or Securities and Exchange Board of India or any statutory authority, on any matter related to capital markets, during the last three years.

The Company has complied with all requirements of the Listing Agreements entered into with the Stock Exchanges as well as the regulations and guidelines of Securities and Exchange Board of India. Consequently, there were no instances of non-compliance by the company, penalties, strictures imposed on the Company by either Securities and Exchange Board of India or the Stock Exchanges or any statutory authority for non-compliance of any matter related to the capital markets during the last three years.

c. Whistle Blower policy and affirmation that no personnel have been denied access to the audit committee.

Pursuant to Section 177(9) and (10) of the Companies Act, 2013 and Regulation 22 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company has adopted a Whistle Blower Policy and has established the necessary vigil mechanism for Directors and employees to report to the management/concerns about unethical behavior, actual or suspected fraud or violation of the Company's code of conduct or ethics policy.

The mechanism provides for adequate safeguard against victimization of employees and Directors who use such mechanism and makes provision for direct access to the Chairperson of the Audit Committee in exceptional cases.

No personnel have been denied access to the Audit Committee. The said policy has been also put up on the website of the Company at the following link: **Weblink**: http://www.asiapackltd.com/Content/UPLOADED/media0921700105.pdf

d. Details of compliance with mandatory requirements and adoption of the non-mandatory requirements under the Listing Regulations

During the year, the Company has fully complied with the mandatory requirements as stipulated in Listing Regulations.

Adoption of non-mandatory requirements of as provided in Part E of Schedule II to the Listing Regulations is being reviewed by the Board from time-to-time. Compliance status about Non-mandatory requirements of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 is given below:

i. The Board:

Since the company does not have a non-executive chairman it does not maintain such office.

ii. Shareholder Rights:

The quarterly and half-yearly financial results are published in widely circulated dailies and also displayed on Company's website at http://www.asiapackltd.com/

Hence, these are not individually sent to the Shareholders.

iii. Audit qualifications:

The Auditors' Opinion on the Financial Statements is unmodified and Observations made in the Auditor's Report are self-explanatory and therefore do not call for any further comments.

iv. Separate posts of Chairman and CEO:

The company does not have a designated Chairman. Mr. Jitendra Purohit was appointed as CEO of the Company w.e.f. 01st September, 2014.

v. Reporting of Internal Auditor:

The internal auditor reports directly to audit committee.

e. Web link where policy for determining 'material subsidiaries' is disclosed;

The Company has a policy for determining 'material subsidiaries' which is disclosed on its website at the following link:
Weblink: http://www.asiapackltd.com/Content/UPLOADED/media0921700131.pdf

f. Web link where policy on dealing with related party transactions is disclosed;

The Company has a policy for 'dealing with related party transactions' which is disclosed on its website at the following link:
Weblink: http://www.asiapackltd.com/Content/UPLOADED/media0921700102.pdf

g. Disclosure of commodity price risks and commodity hedging:

The Company is not dealing in commodity nor having any commodity price risks and commodity hedging activities during the year under review.

h. Certificate by a company secretary in practice

Mr. B. L. Harawat, proprietor of M/s. B. L. Harawat & Associates, Udaipur, has issued a certificate as required under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, confirming that none of the Directors on the Board of the Company has been debarred or disqualified from being appointed or continuing as director of Companies by the by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority. The certificate is enclosed with this section as **Annexure- A**.

i. It is confirmed that there was no instance during Financial Year 2020-21 when the Board had not accepted any recommendation of any committee of the Board.

j. Payments to statutory auditors as

Particulars of total fees for all services paid by the listed entity to the statutory auditor is given below:

Sl. No.	Particular	31st March, 2021
1.	Audit Fees	Rs. 40,000/-
2.	For Company Law Matters	Rs. 10,000/-

k. Disclosure as per the Sexual Harassment of Women at Workplace (Prevention, Prohibition And Redressal) Act, 2013:

The Company has zero tolerance on Sexual Harassment at workplace. During the year under review there were no cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

l. Risk management:

Business risk evaluation and management is an ongoing process within the Company. The assessment is periodically examined by the Board through Audit Committee.

m. Disclosure of accounting treatment:

In the preparation of the financial statements, the Company has followed the Indian Accounting Standards (Ind AS) referred to in Section 133 of the Companies Act, 2013.

The significant accounting policies which are consistently applied are set out in the Notes to the Financial Statements.

n. Code of Conduct

As required under Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Company has in place a Code of Conduct applicable to the Board Members as well as the Senior Management Personnel and that the same has been hosted on the Company's website. All the Board Members and the Senior Management Personnel have affirmed compliance with the Code of Conduct, as on March 31, 2021. A declaration to this effect signed by the Mr. Jitendra Purohit Chief Executive officer (CEO) of the Company is enclosed with this section as **Annexure-B**.

o. Chief Executive Officer (CEO) & Chief Financial Officer (CFO) Certification

The CEO and CFO certification as stipulated in Regulation 17(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 was placed before the Board along with financial statement(s) for the year ended March 31, 2021. The board reviewed and took note of the same. The said certificate is enclosed with this section as **Annexure-C**.

p. Reconciliation of Share Capital Audit:

The Reconciliation of Share Capital Audit as stipulated under Regulation 76 of Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018) (erstwhile Regulation 55A of Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996) was carried out by a Practicing Company Secretary for each of the quarter in the Financial Year 2020-21, to reconcile the total admitted capital with National Securities Depository Limited (NSDL) and Central Depository Services (India) Limited (CDSL) and total issued and listed capital. The Reconciliation of Share Capital Audit Reports (the Audit report) confirm that the total issued/subscribed paid up capital is in agreement with the total number of shares in physical form and the total number of dematerialized shares held with the depositories. Such Audit Report for each quarter of the Financial Year 2020-21, has been filed with Stock Exchanges within one month of end of the respective quarter.

Annexure- A to the Report on Corporate Governance

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS
[Pursuant to Regulation 34(3) and Schedule V Para-C Sub clause 10(i) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Members,
Asia Pack Limited,
Registered Office: 3rd Floor, Miraj Campus, Uper Ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

I, B. L. Harawat, proprietor of M/s. B. L. Harawat & Associates, Udaipur have examined the relevant registers, records, forms, returns and disclosures received from the Directors of **Asia Pack Limited** (hereinafter referred to as 'the Company') having CIN: L74950RJ1985PLC003275 and having its Registered Office at 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301 produced before me by the Company for the purpose of issuing this Certificate, in accordance with Regulation 34(3) read with Schedule V Para-C Sub Clause 10(i) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

In my opinion and to the best of my information and according to the verifications (including Directors Identification Number (DIN) status at the portal www.mca.gov.in) as considered necessary and explanations furnished to me by the Company & its officers, I hereby certify that none of the Directors on the Board of the Company as stated below for the Financial Year ending on 31st March, 2021 have been debarred or disqualified from being appointed or continuing as Directors of companies by the Securities and Exchange Board of India, Ministry of Corporate Affairs, or any such other Statutory Authority.

Sr. No.	Name of Director	Director Identification Number (DIN)	Date of appointment in the Company*
1.	Prakash Chandra Purohit	01383197	24/02/2010
2.	Revant Purbia	02423236	16/11/2008#
3.	Sunil Upadhayay	06767593	20/12/2013
4.	Prabhjeet Kaur	07136767	26/03/2015
5	Pushpendra Jain	03228950	01/02/2021@

*the date of appointment is as per the MCA Portal.
#Mr. Revant Purbia resigned from the office of director w.e.f. 31st January, 2021
@Mr. Pushpendra Jain was appointed as an Additional Director w.e.f. 1st February, 2021

Ensuring the eligibility of for the appointment / continuity of every Director on the Board is the responsibility of the management of the Company. Our responsibility is to express an opinion based on our verification. This certificate is neither an assurance as to the future viability of the Company nor of the efficiency or effectiveness with which the management has conducted the affairs of the Company.

For B. L. Harawat & Associates
Company Secretaries
Sd/-
B. L. Harawat
Proprietor
M. No.: ACS6098
C.P. No.: 3326

Date: 12th August, 2021
Place: Udaipur
UDIN: A006098C000642351

Annexure- B to the Report on Corporate Governance

DECLARATION REGARDING COMPLIANCE BY BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL WITH THE COMPANY'S CODE OF CONDUCT

This is to confirm that the Company has adopted a Code of Conduct for its employees including the Directors, Senior Management & other personnel. In addition, the Company has adopted a Code of Conduct for its Independent Directors including Non-Executive Directors. These Codes are available on the Company's website.

In accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, executed with the BSE Limited, I, Jitendra Purohit in my capacity as Chief Executive Officer (CEO) of the Company, hereby confirm that all the Directors and the Senior Management Personnel of the Company have affirmed compliance with the Code of Conduct as applicable to them, for the Financial Year ended March 31, 2021.

For the purpose of this declaration, Senior Management means the Chief Financial Officer and the Company Secretary as on March 31, 2021.

Sd/-
Jitendra Purohit
Chief Executive Officer

Place: Nathdwara
Date: 12th August, 2021

Annexure- C to the Report on Corporate Governance

COMPLIANCE CERTIFICATE / CEO AND CFO CERTIFICATE
[As per Regulation 17(8) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Board of Directors,
Asia Pack Limited,
Registered Office: 3rd Floor, Miraj Campus, Uper Ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

We, Jitendra Purohit, Chief Executive Officer and Pushpendra Jain, Chief Financial Officer of Asia Pack Limited, certify that:

1. We have reviewed financial statements and the cash flow statement of Asia Pack Limited for the year ended 31st March 2021 and that to the best of our knowledge and belief:
   a. these statements do not contain any materially untrue statement or omit any material fact or contain statements that might be misleading;
   b. these statements together present a true and fair view of the Company's affairs and are in compliance with existing accounting standards, applicable laws and regulations.

2. To the best of our knowledge and belief, no transaction entered into by the Company during the year which are fraudulent, illegal or violative of the code of conduct of the Company.

3. We accept responsibility for establishing and maintaining internal controls over financial reporting and that we have evaluated the effectiveness of internal control systems of the Company over financial reporting and we have disclosed to the auditors and the Audit Committee, deficiencies in the design or operation of such internal controls over financial reporting, if any, of which we are aware and the steps we have taken, propose to take, to rectify these deficiencies. In our opinion, there are adequate internal controls over financial reporting.

4. We have indicated to the auditors and the Audit Committee that there are:
   a. no significant changes in internal control over financial reporting during the year;
   b. no significant changes in accounting policies during the year; and
   c. no instances of fraud of which we have become aware and the involvement therein, if any, of the management or an employee having a significant role in the Company's internal control systems over financial reporting.

Sd/-
Jitendra Purohit
Chief Executive Officer

Sd/-
Pushpendra Jain
Chief Financial Officer

Place: Nathdwara
Date: 30th June, 2021

INDEPENDENT AUDITOR'S REPORT

To,
The Members,
ASIA PACK LIMITED,
3rd Floor, Miraj Campus, Uper Ki Oden,
Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

Auditor's Opinion

We have audited the financial statements of ASIA PACK LIMITED ("the Company"), which comprise the balance sheet as at 31st March, 2021 and the statement of profit and loss (including other comprehensive income), statement of changes in equity and statement of cash flows for the year ended 31st March, 2021, and notes to the financial statements, including a summary of significant accounting policies and other explanatory information in which it included the Returns for the year ended on **31st March, 2021**.

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid financial statements give the information required by the Companies Act, 2013 in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at **31st March, 2021**, and its profit including its cash flows and the changes in Equity for the year ended on that date.

Basis for opinion

We conducted our audit in accordance with the Standards on Auditing (SAs) specified under section 143(10) of the Companies Act 2013. Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the financial statement's sec on 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 together with the ethical requirements that are relevant to our audit of the financial statements under the provision of the Companies Act, 2013 and the rules there under, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

***Responsibility of Management for the Financial Statements**:*

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation of these financial statements that give a true and fair view of the financial position, financial performance, changes in equity and cash flows of the Company in accordance with the accounting principles generally accepted in India, including the Accounting Standards specified under section 133 of the Act. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding of the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate implementation and maintenance of accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and 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.

The Board of Directors are also responsible for overseeing the company's financial reporting process.

Auditors' Responsibility for the Audit of 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. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our Audit opinion of the 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. 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 respective company's policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013. 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 given in **'ANNEXURE – A',** of Independent Auditor's Report.

Report on Other Legal and Regulatory Requirements

As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act, we give in the '**ANNEXURE – B'**, a statement on the matters specified in the paragraph 3 & 4 of the order. As required by section 143(3) of the Act, we report that:

a. We have sought and obtained all the information and explanations to the best of our knowledge and belief were necessary for the purposes of our audit.
b. In our opinion, proper books of accounts as required by Law have been kept by the Company so far as it appears from our examination of those books.
c. The Balance Sheet, the Statement of Profit & Loss including the Cash Flow Statement & Statement of Changes in Equity dealt with by this report are in agreement with the books of account.
d. In our opinion, the aforesaid financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rule, 2014 & the Companies (Indian Accounting Standards) Rules, 2015, as amended.
e. On the basis of written representations received from the directors as on March 31, 2021 taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2021 from being appointed as a director in terms of Section 164(2) of the Act.

FOR VINOD SINGHAL & CO.LLP
CHARTERED ACCOUNTANTS
FRN: 005826C/C400276

Sd/-
FCA PRATEEK GOYAL
PARTNER
MEMBERSHIP NO.: 411040
UDIN: 21411040AAAACK6146
DATE: 30.06.2021
PLACE: NATHDWARA

Annexure - A to the Independent Auditors' Report

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").

In conjunction with our audit of the financial statements of the Company as of and for the year ended 31st March 2021, we have audited the internal financial controls over financial reporting of **ASIA PACK LIMITED ("The Company")** as of that date.

Management's Responsibility for Internal Financial Controls

The Company's management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India ("the Guidance Note"). 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 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 Standard of Auditing prescribed under section 143(10) of the Act and the Guidance Note, to extent applicable to an audit of internal financial controls. Those Standards and the Guidance Note Required that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

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

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

Meaning of Internal Financial Controls over Financial Reporting

A Company's internal financial control over financial reporting is process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statement 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 frauds may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, to the best of our information and according to the explanations given to us, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operation effectively as at 31st March 2021, 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 Controls over Financial Reporting issued by the Institute of Chartered Accountants of India.

FOR VINOD SINGHAL & CO LLP
CHARTERED ACCOUNTANTS
REGISTRATION NO.: 005826C/C400276

Sd/-
FCA PRATEEK GOYAL
PARTNER
MEMBERSHIP NO.: 411040
DATE: 30.06.2021
PLACE: NATHDWARA
UDIN: 21411040AAAACK6146

"ANNEXURE-B"TO THE INDEPENDENT AUDITORS' REPORT

The Annexure referred to in Independent Auditor's Report to the members of the Company on the financial statements for the year ended 31st March 2021, we report that:

(i)	(a)	• Whether the company is maintaining proper records showing full particulars, including quantitative detail and situation of Property, Plant and Equipment; • whether the company is maintaining proper records showing full particulars of intangible assets;	**Yes, the company is maintaining full details of the particulars of Property, Plant and Equipment as well as Intangible Assets.**
	(b)	Whether these Property, Plant and Equipment have been physically verified by the management at reasonable intervals; whether any material discrepancies were noticed in such verification and if so, whether the same have been properly dealt with in the books of accounts;	**Yes, the Property, Plant and Equipment have been physically verified by the management at regular intervals.**
	(c)	whether the title deeds of all the immovable properties (other than properties where the company is the lessee and the lease agreements are duly executed in favor of the lessee) disclosed in the financial statements are held in the name of the company, if not, provide the details thereof.	**Yes, the same is complied.**
	(d)	whether the company has revalued its Property, Plant and Equipment (including Right of Use assets) or intangible assets or both during the year and, if so, whether the revaluation is based on the valuation by a Registered Valuer; specify the amount of change, if change is 10% or more in the aggregate of the net carrying value of each class of Property, Plant and Equipment or intangible assets;	**No revaluation done by the company during the Financial Year 2020-21.**
	(e)	whether any proceedings have been initiated or are pending against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and rules made thereunder, if so, whether the company has appropriately disclosed the details in its financial statements;	**No**
(ii)	(a)	whether physical verification of inventory has been conducted at reasonable intervals by the management and whether, in the opinion of the auditor, the coverage and procedure of such verification by the management is appropriate; whether any discrepancies of 10% or more in the aggregate for each class of inventory were noticed and if so, whether they have been properly dealt with in the books of account;	**Company does not have inventory as on 31st March 2021.**
	(b)	whether during any point of time of the year, the company has been sanctioned working capital limits in excess of five crore rupees, in aggregate, from banks or financial institutions on the basis of security of current assets; whether the quarterly returns or statements filed by the company with such banks or financial institutions are in agreement with the books of account of the company, if not, give details;	**Company does not have sanctioned working capital in excess of Five Crore rupees.**
(iii)		whether during the year the company has made investments in, provided any guarantee or security or granted any loans or advances in the nature of loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or any other parties, if so,-	**Yes**
	(a)	whether during the year the company has provided loans or provided advances in the nature of loans, or stood guarantee, or provided security to any other entity, if so indicate – • the aggregate amount during the year, and balance outstanding at the balance sheet date with respect to such loans or advances and guarantees or security to subsidiaries, joint ventures and associates;	**Yes** • **Subsidiaries, joint ventures and associates:** - **Aggregate amount during the year: Nil Balance outstanding at the balance sheet date: Nil**

		• the aggregate amount during the year, and balance outstanding at the balance sheet date with respect to such loans or advances and guarantees or security to parties other than subsidiaries, joint ventures and associates;	• **Other than Subsidiaries, joint ventures and associates:** - **Aggregate amount during the year: Rs. 2,38,00,000/-** **Balance outstanding at the balance sheet date: Rs. 8,46,25,058/-**
	(b)	whether the investments made, guarantees provided, security given and the terms and conditions of the grant of all loans and advances in the nature of loans and guarantees provided are not prejudicial to the company's interest;	**Company charged interest @7.50% p.a. on such loan, hence we can conclude that the loans provided are not prejudicial to the interest of company.**
	(c)	in respect of loans and advances in the nature of loans, whether the schedule of repayment of principal and payment of interest has been stipulated and whether the repayments or receipts are regular;	**No repayment schedule is there for loans, stipulating the payment of principal & interest, however receipts are regular.**
	(d)	if the amount is overdue, state the total amount overdue for more than ninety days, and whether reasonable steps have been taken by the company for recovery of the principal and interest;	**No amount is overdue for more than 90 days.**
	(e)	whether any loan or advance in the nature of loan granted which has fallen due during the year, has been renewed or extended or fresh loans granted to settle the overdues of existing loans given to the same parties, if so, specify the aggregate amount of such dues renewed or extended or settled by fresh loans and the percentage of the aggregate to the total loans or advances in the nature of loans granted during the year	**No, loan granted which has fallen due during the year, has not been renewed nor extended or fresh loans granted to settle the overdues of existing loans given to the same parties**
	(f)	whether the company has granted any loans or advances in the nature of loans either repayable on demand or without specifying any terms or period of repayment, if so, specify the aggregate amount, percentage thereof to the total loans granted, aggregate amount of loans granted to Promoters, related parties as defined in clause (76) of section 2 of the Companies Act, 2013;	**All the loans granted are without repayment schedule.**
(iv)		In respect of loans, investments, guarantees and security whether provisions of section 185 and 186 of the Companies Act, 2013 have been complied with. If not, provide details thereof.	**Yes**
(v)		in respect of deposits accepted by the company or amounts which are deemed to be deposits, whether the directives issued by the Reserve Bank of India and the provisions of sections 73 to 76 or any other relevant provisions of the Companies Act and the rules made thereunder, where applicable, have been complied with, if not, the nature of such contraventions be stated; if an order has been passed by Company Law Board or National Company Law Tribunal or Reserve Bank of India or any court or any other tribunal, whether the same has been complied with or not;	**The company has not accepted any deposit from the public.**
(vi)		Where maintenance of cost records has been prescribed by the Central Government under sub-section (1) of section 148 of the Act, where such accounts and records have been made and maintained;	**No requirement for maintenance of cost records are prescribed by the government.**
(vii)	(a)	whether the company is regular in depositing undisputed statutory dues including Goods and Services Tax, provident fund, employees' state insurance, income-tax, sales-tax, service tax, duty of customs, duty of excise, value added tax, cess and any other statutory dues to the appropriate authorities and if not, the extent of the arrears of outstanding statutory dues as on the last day of the financial year concerned for a period of more than six months from the date they became payable, shall be indicated;	**The company is regular in depositing all statutory dues.**
	(b)	where statutory dues referred to in sub-clause (a) have not been deposited on account of any dispute, then the amounts involved and the	

		forum where dispute is pending shall be mentioned (a mere representation to the concerned Department shall not be treated as a dispute);	
(viii)		whether any transactions not recorded in the books of account have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961), if so, whether the previously unrecorded income has been properly recorded in the books of account during the year;	**No, such transaction present during the year.**
(ix)	(a)	whether the company has defaulted in repayment of loans or other borrowings or in the payment of interest thereon to any lender, if yes, the period and the amount of default to be reported	**The company does not have any loans or borrowings from any financial institutions, banks, government or debenture holders during the year. Accordingly, this para is Not applicable.**
	(b)	whether the company is a declared willful defaulter by any bank or financial institution or other lender;	**As per the explanation and information provided to us company is not declared wilful defaulter by any bank or financial institution.**
	(c)	whether term loans were applied for the purpose for which the loans were obtained; if not, the amount of loan so diverted and the purpose for which it is used may be reported;	**No term loan is obtained by the company.**
	(d)	whether funds raised on short term basis have been utilized for long term purposes, if yes, the nature and amount to be indicated;	**No such case observed**
	(e)	whether the company has taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures, if so, details thereof with nature of such transactions and the amount in each case;	**No**
	(f)	whether the company has raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies, if so, give details thereof and also report if the company has defaulted in repayment of such loans raised;	**No**
(x)	(a)	whether moneys raised by way of initial public offer or further public offer (including debt instruments) during the year were applied for the purposes for which those are raised, if not, the details together with delays or default and subsequent rectification, if any, as may be applicable, be reported;	**Not applicable**
	(b)	whether the company has made any preferential allotment or private placement of shares or convertible debentures (fully, partially or optionally convertible) during the year and if so, whether the requirements of section 42 and section 62 of the Companies Act, 2013 have been complied with and the funds raised have been used for the purposes for which the funds were raised, if not, provide details in respect of amount involved and nature of noncompliance;	**No allotment done by the company during the year**
(xi)	(a)	whether any fraud by the company or any fraud on the company has been noticed or reported during the year, if yes, the nature and the amount involved is to be indicated;	**As per the management, there is no such case as on the date of balance sheet.**
	(b)	whether any report under sub-section (12) of section 143 of the Companies Act has been filed by the auditors in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government;	**No**
	(c)	whether the auditor has considered whistle-blower complaints, if any, received during the year by the company;	**As per the explanation and information provided to us, no whistle blower complaints received during the year by the company.**

(xii)		Whether managerial remuneration has been paid/ provided in accordance with the requisite approvals mandated by the provisions of section 197 read with schedule V to the Companies Act? If not, state the amount involved and steps taken by the company for securing of the same.	**Yes.**
(xiii)		• whether the Nidhi Company has complied with the Net Owned Funds to Deposits in the ratio of 1: 20 to meet out the liability; • whether the Nidhi Company is maintaining 10 % unencumbered term deposits as specified in the Nidhi Rules, 2014 to meet out the liability; • whether there has been any default in payment of interest on deposits or repayment thereof for any period and if so, the details thereof;	**Not applicable as company is not a Nidhi company**
(xiv)		Whether all transactions with related parties are in compliance with section 188 and 177 of Companies Act, 2013 where applicable and the details have been disclosed in the Financial Statements etc. as required by the accounting standards and Companies Act, 2013.	**According to the information and explanations given to us and based on our examination of the records of the company, transactions with the related parties are in compliance with sections 177 and 188 of the act where applicable and details of such transactions have been disclosed in the financial statements as required by the applicable accounting standards.**
(xv)		• whether the company has an internal audit system commensurate with the size and nature of its business; • whether the reports of the Internal Auditors for the period under audit were considered by the statutory auditor	**Yes, the company have system of Internal Audit system, commensurate the size and nature of its business.** **Yes, it was considered.**
(xvi)		Whether the company has entered into any non- cash transactions with directors or persons connected with him and if so, whether provisions of section 192 of Companies Act, 2013 have been complied with.	**According to the information and explanations given to us and based on our examination of the records of the company, the company has not entered into non-cash transactions with directors or persons connected with him, hence this para is not applicable.**
(xvii)	(a)	whether the company is required to be registered under section 45-IA of the Reserve Bank of India Act, 1934 (2 of 1934) and if so, whether the registration has been obtained	**The company is not required to be registered under section 45-ia of the reserve bank of India act 1934 & none of these clause is applicable to the company.**
	(b)	whether the company has conducted any Non-Banking Financial or Housing Finance activities without a valid Certificate of Registration (CoR) from the Reserve Bank of India as per the Reserve Bank of India Act, 1934;	
	(c)	whether the company is a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India, if so, whether it continues to fulfil the criteria of a CIC, and in case the company is an exempted or unregistered CIC, whether it continues to fulfil such criteria;	
	(d)	whether the Group has more than one CIC as part of the Group, if yes, indicate the number of CICs which are part of the Group	
(xviii)		whether the company has incurred cash losses in the financial year and in the immediately preceding financial year, if so, state the amount of cash losses;	**As per the information given to us and the examination of books of accounts, no such cash loss incurred by the company.**
(xix)		whether there has been any resignation of the statutory auditors during the year, if so, whether the auditor has taken into consideration the issues, objections or concerns raised by the outgoing auditors;	**No resignation has been made by the statutory auditor during the year**

(xx)		on the basis of the financial ratios, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the financial statements, the auditor's knowledge of the Board of Directors and management plans, whether the auditor is of the opinion that no material uncertainty exists as on the date of the audit report that company is capable of meeting its liabilities existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date;	**On the basis of our analysis of the financial ratios, ageing and expected dates of realization of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the board of directors and management plans, there is no material uncertainty exists as on the date of audit report that company is capable of meeting its liability existing at the date of balance sheet as and when they fall due within a period of one year from the balance sheet date**
(xxi)	(a)	whether, in respect of other than ongoing projects, the company has transferred unspent amount to a Fund specified in Schedule VII to the Companies Act within a period of six months of the expiry of the financial year in compliance with second proviso to sub-section (5) of section 135 of the said Act;	**Section 135 is not applicable to the company**
	(b)	(b) whether any amount remaining unspent under sub-section (5) of section 135 of the Companies Act, pursuant to any ongoing project, has been transferred to special account in compliance with the provision of subsection (6) of section 135 of the said Act;	

For VINOD SINGHAL & CO. LLP
CHARTERED ACCOUNTANTS
Registration No.: 005826C/C400276

Sd/-
FCA PRATEEK GOYAL
Partner
Membership No.: 411040
Date: 30.06.2021
Place: NATHDWARA
UDIN: 21411040AAAACK6146

Asia Pack Limited
Registered Office: 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301
CIN: L74950RJ1985PLC003275
Balance Sheet as at 31st March, 2021

(Amount in Rupees)

S. No.	Particulars	Note No.	Figures as at the end of current reporting period 31st March 2021	Figures as at the end of previous reporting period 31st March 2020
	ASSETS			
(1)	**Non-current Assets**			
	(a) Property, Plant and Equipment	2	1,82,61,340	1,89,29,855
	(b) Capital Work-In-Progress	2	-	5,52,934
	(c) Other Intangible Assets	2	6,074	7,000
	(d) Financial Assets			
	(i) Investments	3	8,12,86,349	8,18,03,749
	(ii) Trade Receivables	4	3,83,975	-
	(iii) Loans	5	8,96,82,296	8,71,97,277
	Total Non-current Assets		**18,96,20,034**	**18,84,90,815**
(2)	**Current Assets**			
	(a) Financial Assets			
	(ii) Cash and Cash Equivalents	6	7,07,911	2,21,800
	(iii) Loans	7	4,04,551	5,85,744
	(b) Other Current Assets	8	3,114	3,825
	Total Current Assets		**11,15,576**	**8,11,369**
	Total Assets		**19,07,35,610**	**18,93,02,184**
	EQUITY AND LIABILITIES			
	Equity			
	(a) Equity Share Capital	9	2,73,08,599	2,73,08,599
	(b) Other Equity	10	16,03,06,994	15,93,16,082
	Total Equity		**18,76,15,593**	**18,66,24,681**
	LIABILITIES			
(1)	**Non-Current Liabilities**			
	(a) Provisions	11	8,25,773	6,36,593
	(b) Deferred Tax Liabilities (Net)	12	18,49,327	17,85,233
	Total Non - current Liabilities		**26,75,100**	**24,21,826**
(2)	**Current Liabilities**			
	(b) Other Current Liabilities	13	3,72,903	1,95,463
	(c) Provisions	14	72,014	60,214
	Total Current Liabilities		**4,44,917**	**2,55,677**
	Total Equity and Liabilities		**19,07,35,610**	**18,93,02,184**

Significant Accounting Policies **1**
Additional and Other Explanatory Information **21**
Accompanying notes from 1 to 21 are forming an integral part of the Financial Statements
As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

On behalf of the Board of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
Ankita Mata
Company Secretary
M. No.: A56788

Asia Pack Limited
Registered Office: 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301
CIN: L74950RJ1985PLC003275
Statement of Profit and Loss for the year ended 31st March, 2021

(Amount in Rupees)

S. No.	Particulars	Note No.	Figures as at the end of current reporting period From 01/04/2020 to 31/03/2021	Figures as at the end of previous reporting period From 01/04/2019 to 31/03/2020
I	Revenue from Operations	15	14,55,000	9,60,000
II	Other Income	16	58,72,527	92,40,037
III	**TOTAL INCOME (I + II)**		**73,27,527**	**1,02,00,037**
IV	**EXPENSES**			
	Employee Benefits Expenses	17	25,69,581	37,57,816
	Finance Costs	18	-	9,202
	Depreciation and Amortisation Expenses	19	6,69,441	7,06,455
	Other Expenses	20	23,84,453	24,80,333
	TOTAL EXPENSES (IV)		**56,23,475**	**69,53,806**
V	**Profit/(Loss) before Exceptional and Tax (III-IV)**		**17,04,052**	**32,46,231**
VI	Exceptional Items		-	-
VII	**Profit/(Loss) Before Tax**		**17,04,052**	**32,46,231**
VIII	**Tax Expense**			
	Current Tax			
	Income Tax		6,60,126	-
	MAT for the Year		-	6,36,764
	MAT Credit Entitlement		-	(5,84,522)
	Deferred Tax		64,094	10,09,031
IX	**Profit/(Loss) for the period from Continuing Operations (VII-VIII)**		**9,79,832**	**21,84,958**
X	**Profit/(Loss) from Discontinued Operations**		**-**	**-**
XI	**Tax Expense of Discontinued Operations**		**-**	**-**
XII	**Profit/(Loss) from Discontinued Operations (after tax) (X-XI)**		**-**	**-**
XIII	**Profit(Loss) for the Period**		**9,79,832**	**21,84,958**
XIV	**Other Comprehensive Income**			
	a) Items that will not be reclassified to Profit or Loss			
	Gain/ (Loss) on Equity Investments at fair value through Other Comprehensive Income	20A	11,080	(1,52,836)
XV	**Total Comprehensive Income for the year (XIII+XIV) Comprising Profit (Loss) and Other comprehensive Income for the period)**		**9,90,912**	**20,32,122**
XVI	**Earnings per Equity Share**	21V		
	-Basic		0.37	0.83
	-Diluted		0.37	0.83

Significant Accounting Policies **1**
Additional and Other Explanatory Information **21**
Accompanying notes from 1 to 21 are forming an integral part of the Financial Statements
As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

On behalf of the Board of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
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Company Secretary
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Asia Pack Limited

Registered Office: 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

CIN: L74950RJ1985PLC003275

Cash Flow Statement for the Period Ended 31st March, 2021

(Amount in Rupees)

S. No.	Particulars	Figures as at the end of current reporting period From 01/04/2020 to 31/03/2021		Figures as at the end of previous reporting period From 01/04/2019 to 31/03/2020	
A	**CASH FLOW FROM OPERATING ACTIVITIES:**				
	Net Profit before tax and Extra Ordinary items		17,04,052		32,46,231
	Adjustment for				
	Depreciation and Amortisation	6,69,441		7,06,455	
	Loss from Investment in Partnership Firm (net)	5,28,480		8,35,585	
	Loss on Impairment of Assets	5,52,934		-	
	Interest income on Loans & Advances	(56,26,480)		(83,23,902)	
	Profit on sale of Investments in Mutual fund	(82,569)		(8,75,690)	
			(39,58,194)		(76,57,552)
	Operating Profit before Working Capital Changes		(22,54,142)		(44,11,321)
	Adjustment for				
	Decrease/(Increase) Trade & Other Receivables	(3,83,975)			
	Decrease/(Increase) Loans and advances and other assets	61,459		5,78,051	
	Increase/(Decrease) Trade payable & other Liabilities & provisions	3,78,420		(6,90,74,999)	
	Decrease/(Increase) Other current assets	711		(661)	
			56,615		6,84,97,609)
	Cash Generated from Operations before Extraordinary Items		(21,97,527)		(7,29,08,930)
	Cash Flow Before Taxes		(21,97,527)		(7,29,08,930)
	Refund of Income tax		2,67,626		
	Taxes on Income Paid		(1,40,268)		-
	Net Cash flow from Operating Activities	**A**	(20,70,169)	**A**	(7,29,08,930)
B	**CASH FLOW FROM INVESTING ACTIVITIES**				
	Interest income received on Loans & Advances from Related Parties		4,21,986		-
	Loans and advances given to Related Parties		(2,38,00,000)		(6,01,00,000)
	Loans and advances received back from Related Parties		2,62,00,000		5,45,00,000
	Purchase of Mutual Funds		(2,46,00,000)		(12,00,000)
	Proceeds from Sale of Mutual Funds		2,46,00,000		7,72,00,000
	Gain on Sale of Mutual Fund		82,569		8,75,690
	Net Cash flow from Investing Activities	**B**	29,04,555	**B**	7,12,75,690
C	**CASH FLOW FROM FINANCING ACTIVITIES:**				
	Net Cash flow from Financing Activities	**C**	-	**C**	-
	Net Increase/(Decrease) in Cash and Cash equivalents	**A+B+C**	**8,34,386**	**A+B+C**	**(16,33,240)**
	Cash and Cash equivalents (Opening Balance)		2,21,800		18,55,040
	Cash and Cash equivalents (Closing Balance)		**7,07,911**		**2,21,800**

Notes:

1. Cash and Cash Equivalents represent Cash and Bank Balances. (Refer Note no. 6)
2. The previous year's figures have been regrouped wherever necessary as per current year presentation.
3. The above Cash Flow Statement has been prepared as per Indirect Method as set out in Indian Accounting Standard-7 "Statement of Cash Flow".

As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

On behalf of the Board of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
Ankita Mata
Company Secretary
M. No.: A56788

Notes to and forming part of the Financial Statements:
NOTE 1: Significant accounting policies

1) Company Overview
Asia Pack Limited is a listed entity incorporated in India on April 23rd, 1985 under the provision of the Companies Act, 1956 having CIN L74950RJ1985PLC003275 and presently having its registered office at 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN- 313301. The Company is currently engaged in Real estate business.

2) Basis of Preparation of Financial Statements
These financial statements are prepared in accordance with Indian Accounting Standards (IndAs) under the historical cost convention on the accrual basis except for certain financial instruments which are measured at fair values, the provisions of the Companies Act, 2013 ('The Act') (to the extent notified). The IndAs are prescribed under section 133 of the Act read with Rule 3 of the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2017.

Accounting policies have been consistently applied except where a newly issued Accounting Standard is initially adopted or a revision to an existing Accounting Standard requires a change in the Accounting policies hitherto in the use.

2A) Use of estimates
The preparation of financial statements in conformity with IndAs requires the management to make judgment, estimates and assumptions. These estimates, judgments and assumptions affect the application of accounting policies and the reported amounts of assets and liabilities, the disclosure of contingent assets & liabilities at the date of the financial statements and reported amounts of revenues and expenses during the period. The application of Accounting Policies that require critical Accounting estimates involving complex and subjective judgments and the use of assumptions in these financial statements have been disclosed in the notes separately. Accounting estimates could change from period to period. Actual results could differ from those estimates. Appropriate changes in estimates are made as the management becomes aware of the changes in circumstances surrounding the estimates. Changes in estimates are reflected in the financial statements in the period in which changes are made and, if material, there effects are disclosed in the notes to the financial statements.

2B) Summary of Significant Accounting Policies
The Financial Statements have been prepared using the Accounting Policies and measurement basis summarized below:

2B.1) Revenue Recognition
Rental income is recognized on the accrual basis as per agreed terms.

Interest income is recognized as other income on a time proportion basis taking into account the amount outstanding and the applicable interest rate.

On Disposal of investments, the difference between its carrying amounts and net disposal proceeds is charged or credited to the Statement of Profit and Loss under the head of other income. Gain/Loss on sale of investments is determined on First in First Out cost basis.

2B.2) Property, Plant and Equipment
Property, Plant and Equipment are stated at cost, net of accumulated depreciation and accumulated impairment losses, if any. The cost comprises purchase price, borrowing costs, if capitalization criteria are met and directly attributable cost of bringing the asset to its working condition for the intended use. Any trade discounts and rebates are deducted in arriving at the purchase price. On transition to IndAs, the Company has elected to continue with the carrying value of all its Property, Plant and Equipment recognized as at 1 April 2016 measured as per the previous GAAP and use that carrying value as the deemed cost of the Property, Plant and Equipment.

Depreciation on Property, Plant and Equipment is charged on WDV either on the basis of rates arrived at with reference to the useful life of the assets evaluated & approved by the management or rates arrived at based on useful life prescribed under Part C of Schedule II of the Companies Act, 2013.

The residual values, useful lives and methods of Depreciation of Property, Plant and Equipment are reviewed at each financial year end and adjusted prospectively, if appropriate.

2B.3) Intangible Assets

The management has defined the definite life of 10 years for intangible assets mainly consist of brands/trademarks.

2B.4) Financial Instruments

Financial Assets

Equity Instruments

All investments in equity instruments classified under financial assets are initially measured at Book value , the Company may, on initial recognition, irrevocably elect to measure the same at FVTOCI . The Company makes such election on an instrument-by-instrument basis. Fair value changes on an equity instrument is recognised as other income in the Statement of Profit and Loss unless the Company has elected to measure such instrument at FVOCI. Fair value changes excluding dividends, on an equity instrument measured at FVOCI are recognised in OCI. Amounts recognised in OCI are not subsequently reclassified to the Statement of Profit and Loss. Dividend income on the investments in equity instruments are recognised as 'other income' in the Statement of Profit and Loss. Details are disclosed in Note No. 20A.

Investment in Partnership Firm

The company has Invested in the Partnership Firm M/s S S Developers the details has been disclosed in the notes separately.

Financial liabilities

All financial liabilities are recognized initially at fair value, as applicable, and net of directly attributable transaction costs. The Company's financial liabilities include trade and other payables.

2B.5 Borrowing Costs

The Company does not have any qualifying assets, hence there are no Borrowing costs that are attributable to the acquisition or construction of qualifying asset.

2B.6 Impairment of Non-financial assets

The Company assesses, at each reporting date, have to check whether there is an indication that an asset may be impaired. If any indication exists, or when annual impairment testing for an asset is required, the Company estimates the asset's recoverable amount. Impairment of Non-Financial assets is made during the period under audit of Rs.552934.00.

2B.7 Inventories

Cost of trading material is generally valued by using first in first out (FIFO) method and Goods in Transit is shown along with closing inventory when all the risk and rewards have been transferred to company for the respective material and Purchase value of such Goods in transit is included in the purchase of stock in trade under statement of profit and Loss, if any. However there is NIL inventory on reporting date.

2B.8 Taxation

Current Income Tax

Current income tax assets and liabilities are measured at the amount expected to be recovered from or paid to the taxation authorities. The tax rates and tax laws used to compute the amount are those that are enacted or substantively enacted, at the reporting date.

Current income tax relating to items recognized outside profit or loss is recognized outside profit or loss. Current tax items are recognized in correlation to the underlying transaction either in OCI or directly in equity. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and establishes provisions where appropriate.

Deferred tax

Deferred tax is provided using the liability method on temporary differences between the tax bases of assets and liabilities and their carrying amounts for financial reporting purposes at the reporting date. Deferred tax liabilities are recognized for all taxable temporary differences, except when it is probable that the temporary differences will not reverse in the foreseeable future.

Deferred tax assets are recognized for all deductible temporary differences, the carry forward of unused tax credits and any unused tax losses. Deferred tax assets are recognized to the extent that it is probable that taxable profit will be available against which the deductible temporary differences, and the carry forward of unused tax credits and unused tax losses can be utilized.

The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognized deferred tax assets are re-assessed 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.

The Company has recognized such temporary difference, details of which are referred in Note No. 12.

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 profit or loss is recognized outside profit or loss (either in other comprehensive income or in equity). Deferred tax items are recognized in correlation to the underlying transaction either in OCI or directly in equity.

Deferred tax assets and deferred tax liabilities are offset if a legally enforceable right exists to set off current tax assets against current tax liabilities and the deferred taxes relate to the same taxable entity and the same taxation authority.

Minimum Alternate Tax

Minimum Alternate Tax (MAT) paid in accordance with the tax laws, which gives future economic benefits in the form of adjustment to future income tax liability, is considered as an asset if there is convincing evidence that the Company will pay normal income tax in future.

Accordingly, MAT is recognized as an asset in the Balance Sheet when it is probable that future economic benefit associated with it will flow to the Company. MAT Credit entitlements are reviewed for the appropriates of their respective carrying value at each balance sheet date.

2B.9 Employee benefit schemes

Short-term employee benefits are recognized as an expense at the undiscounted amount in the Statement of profit and loss for the year in which the related service is rendered. Post employment and other long term employee benefits are recognized as an expense in the profit and loss account of the year in which the employee has rendered services and treated as defined benefit plans. The expense is recognized on the assumption that such benefits are payable at the end of the year to all the eligible employees.

2B.10 Provision for liabilities and charges, Contingent liabilities and Contingent Assets

The assessments undertaken in recognising provisions and contingencies have been made in accordance with the applicable Ind AS.

Provisions represent liabilities to the Company for which the amount or timing is uncertain.

Provisions are recognized when the Company has a present obligation (legal or constructive), as a result of past events, and it is probable that an outflow of resources, that can be reliably estimated, will be required to settle such an obligation. If the effect of the time value of money is material, provisions are determined by discounting the expected future cash flows to net present value using an appropriate pre-tax discount rate that reflects current market assessments of the time value of money and, where appropriate, the risks specific to the liability. Unwinding of the discount is recognized in the statement of profit and loss as a finance cost. Provisions are reviewed at each reporting date and are adjusted to reflect the current best estimate.

In the normal course of business, contingent liabilities may arise from litigation and other claims against the Company. Guarantees are also provided in the normal course of business. There are certain obligations which management has concluded, based on all available facts and circumstances, are not probable of payment or are very difficult to quantify reliably, and such obligations are treated as contingent liabilities and disclosed in the notes but are not reflected as liabilities in the financial statements. Although there can be no assurance regarding the final outcome of the legal proceedings in which the Company involved, it is not expected that such contingencies will have a material effect on its financial position or profitability.

Contingent assets are not recognized but disclosed in the financial statements when an inflow of economic benefits is probable.

2B.11 Earning Per Share

In arriving at the EPS, the Company's net profit/ loss after tax before adjustment of Other comprehensive income, computed in terms of the Ind AS, is divided by the weighted average number of equity shares outstanding on the last day of the reporting period. The EPS thus arrived at is known as 'Basic EPS'. There are no potential equity shares in existence during the current and previous period therefore Basic & Diluted EPS are similar.

2B.12 Cash Flow Statement

Cash flows are reported using indirect method as set out in Ind AS -7 "Statement of Cash Flows", whereby profit / (loss) before tax is adjusted for the effects of transactions of non-cash nature and any deferrals or accruals of past or future cash receipts or payments. The cash flows from operating, investing and financing activities of the Company are segregated based on the available information.

Signatures to Note 1 which form an integral part of the Financial Statements

As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

On behalf of the Board of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
Ankita Mata
Company Secretary
M. No.: A56788

Notes to the Financial Statement for the year ended March 31, 2021

NOTE 2: Property, Plant and Equipment

		Gross Block				Depreciation / Amortisation				Net Block	
	Particulars	**Balance as at 1st April 2020**	**Add-itions**	**Disposals**	**Balance as at 31st March 2021**	**Balance as at 1st April 2020**	**Depre-ciation charge for the year**	**Dis-posals**	**Balance as at 31st March 2021**	**Balance as at 31st March 2021**	**Balance as at 31 March 2020**
a.	**Tangible Assets**										
(i)	Buildings	2,00,82,081	-	-	2,00,82,081	31,10,196	3,35,637	-	34,45,833	1,66,36,248	1,69,71,885
(ii)	Furniture and Fixtures	44,19,619	-	-	44,19,619	34,15,808	2,56,915	-	36,72,723	7,46,896	10,03,811
(iii)	Vehicles	54,78,762	-	-	54,78,762	52,04,824	-	-	52,04,824	2,73,938	2,73,938
(iv)	Office equipment	16,32,560	-	-	16,32,560	15,50,932	-	-	15,50,932	81,628	81,628
(v)	Others:										
	(a) Electrical Installation	28,56,506	-	-	28,56,506	23,30,624	74,106	-	24,04,730	4,51,776	5,25,882
	(b) Computer	5,21,923	-	-	5,21,923	4,93,968	1,857	-	4,95,825	26,098	27,955
	(c) Network and Server	8,95,117	-	-	8,95,117	8,50,361	-	-	8,50,361	44,756	44,756
	Total (a)	**3,58,86,568**	**-**	**-**	**3,58,86,568**	**1,69,56,713**	**6,68,515**	**-**	**1,76,25,228**	**1,82,61,340**	**1,89,29,855**
b.	**Other Intangible Assets**										
	(i) Trademark	10,000	-	-	10,000	3,000	926		3,926	6,074	7,000
	Total (b)	**10,000**	**-**	**-**	**10,000**	**3,000**	**926**	**-**	**3,926**	**6,074**	**7,000**
c.	**Capital Work-In-Progress**	5,52,934	-	5,52,934	-	-	-	-	-	-	5,52,934
	Total (c)	**5,52,934**	**-**	**5,52,934**	**-**	**-**	**-**	**-**	**-**	**-**	**5,52,934**
	Total (a+b+c)	**3,64,49,502**	**-**	**5,52,934**	**3,58,96,568**	**1,69,59,713**	**6,69,441**	**-**	**1,76,29,154**	**1,82,67,414**	**1,94,89,789**
	Previous Year	**3,64,49,502**	**-**	**-**	**3,64,49,502**	**1,62,53,258**	**7,06,455**	**-**	**1,69,59,713**	**1,94,89,789**	**2,01,96,244**

NOTE 3: Non Current Financial assets – Investments **(Amount in Rupees)**

Sr. No.	**Particulars**	**Subsidiary / Associate / JV / Controlled Special Purpose Entity / Others**	**No. of Shares / Units**		**Quoted / Unquoted**	**Partly Paid / Fully paid**	**Amount (In Rupees)**		**Basis of Valuation**
			As at 31st March, 2021	**As at 31st March, 2020**			**As at 31st March, 2021**	**As at 31st March, 2020**	
(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**	**(7)**	**(8)**	**(9)**	**(10)**
(a)	**Investment in Equity Instruments**								
	Equity Shares of each of Rs. 1 of Rapid Fire Multitrading Private Limited	Other	80,000	80,000	(Unquoted)	Fully paid	802,015	802,015	At Cost
	Equity Shares of each of Rs. 10 of Miraj Entertainment Limited	Other	20,000	20,000	(Unquoted)	Fully paid	200,000	200,000	At Cost
	Equity Shares of each of Rs. 10 of Miraj Multiservices Limited (Formerly known as Miraj Stationary Products Limited)	Other	17,500	17,500	(Unquoted)	Fully paid	175,000	175,000	At Cost
	Equity Shares of each of Rs. 10 of Miraj Projects Limited	Other	20,000	20,000	(Unquoted)	Fully paid	200,000	200,000	At Cost
	Equity Shares of each of Rs. 10 of Miraj Developers Limited	Other	685,875	685,875	(Unquoted)	Fully paid	46,558,125	46,558,125	At Cost
	Equity Shares of each of Rs. 10 of Alta Vista Estate Private Limited	Other	1,000	1,000	(Unquoted)	Fully paid	200,300	200,300	At Cost
	Equity Shares of each of Rs. 10 of Flour & Food Limited	Other	17,000	17,000	(Unquoted)	Fully paid	510,000	510,000	At Cost Less : Provision for diminution in the value of Investments
	Equity Shares of each of Rs. 10 of Alpine Industries Limited	Other	4,350	4,350	(Unquoted)	Fully paid	249,887	249,887	At Cost Less : Provision for diminution in the value of Investments
	Equity Shares of each of Rs. 10 of Mideast Intergrated Steels Limited	Other	4,000	4,000	(Quoted)	Fully paid	26,440	15,360	At Fair Market Value
Total							**4,89,21,767**	**4,89,10,687**	
Less : Provision for diminution in the value of investment (as mentioned above)							**(7,38,537)**	**(7,38,537)**	
Total (a)-Aggregate amount of investment in shares							**4,81,83,230**	**4,81,72,150**	

Toal aggregate amount of Unquoted investment for the FY 2020-21 in books is of Rs. 4,81,56,790 as on 31st March, 2021.
Total aggregate amount of Quoted investment for the FY 2020-21 in books as well as Market Value of such investment is Rs. 26,440/- as on 31st March, 2021.

(b)	**Investments in partnership firms (Partnership Firm's details mentioned in Note 21 (iv))**			
	S S Developres (Formerly known as Miraj Developers)	**As at 31st March, 2021**	**As at 31st March, 2020**	
	Opening Capital Contributions	3,36,31,599	3,44,67,184	Balance of capital contribution is after netting off Partner's Current A/c in the partnership firm.
	Addition/(Withdrawal) in current year	-	-	
	Add/(Less) : Profit/(Loss) for the year	(5,28,480)	(8,35,585)	
Total (b) Closing Capital Contributions		**3,31,03,119**	**3,36,31,599**	
Grand Total (a+b)		**8,12,86,349**	**8,18,03,749**	

NOTE 4. Trade Receivables **(Amount In Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(i) Outstanding for a period exceeding six months from the date they are due for payment :		
a) Unsecured, Considered Good	1,82,825	-
b) Doubtful	4,70,421	4,70,421
Less: Provision for doubtful debts	(4,70,421)	(4,70,421)
Total (i)	**1,82,825**	**-**
(ii) Others Receivables:		-
a) Unsecured, Considered Good	2,01,150	
Total (ii)	2,01,150	-
Total (i)+(ii)	**3,83,975**	**-**

Trade receivables include Rs. Nil (P.Y. Rs. Nil) due by directors or other officers of the company or any of them either severally or jointly with any other persons or amounts due by firms or private companies respectively in which any director is a partner or a director or a member.

NOTE 5. Non Current Financial Assets-Loans **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(a) Security Deposits, Unsecured, considered good	19,315	24,060
(b) Loans to Related Parties, Unsecured, considered good	8,46,25,058	8,18,20,564
(c) Other Loans, Unsecured, considered good		
(i) Advance to Employees*	-	2,879
(ii) MAT Credit Entitlement	50,37,923	53,49,774
Total	**8,96,82,296**	**8,71,97,277**

*Loans / advances to Employees include of Rs. Nil/- (P.Y. Rs. 2,505/-) given to Director, CEO and other officers of the company under the terms of employment.

NOTE 6. Cash and Cash Equivalents **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(1) Cash and Cash Equivalents		
(a) Balances with banks:		
(i) In Current Accounts	6,47,784	1,60,267
(b) Cash on hand	4,764	9,994
(2) Other Bank Balances:		
(a) Earmarked Fixed Deposits balances with banks		
(i) Deposits with original maturity for more than 3 months but less than 12 months		
Against Staff welfare fund	55,363	51,539
Total	**7,07,911**	**2,21,800**

NOTE 7. Current Financial Assets-Loans **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(a) Other Loans and Advances, Unsecured, considered good :		
(i) Advances to Employees*	42,236	5,854
(ii) Prepaid Expenses	-	20,909
(iii) Prepaid Insurance	54,295	49,658
(iv) Income tax refundable	1,40,268	2,67,626
(v) GST Receivable	1,67,752	2,41,697
(vi) Advances against Service	-	-
(b) Other Loans and Advances, Unsecured, considered doubtful		
(i) Advances to Suppliers	21,00,000	21,00,000
Less: Provision for doubtful advances	(21,00,000)	(21,00,000)
Total	**4,04,551**	**5,85,744**

*Loans/ advances to Employees include of Rs. 1,864/- (Last year Rs. 5,354/-) given to Director, CEO and other officers of the company under the terms of employment.

NOTE 8. Other Current Assets **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
Advance other than Capital Advance		
(a) Accrued Interest on Fixed Deposits	3,114	3,825
Total	**3,114**	**3,825**

Statement of Changes in Equity for the Year ended 31st March, 2021

A. Equity Share Capital **(Amount in Rupees)**

Balance at the beginning of the reporting period i.e. 1st April, 2020	Changes in equity share capital during the year 2020-21		Balance at the end of the reporting period i.e. 31st March, 2021
	Shares Issued during the year	Shares bought back during the year	
2,73,08,599	-	-	2,73,08,599

B. Other Equity **(Amount in Rupees)**

	Reserves and Surplus				Other items of Comprehensive Income		
	Capital Reserve	Securities Premium	General Reserve	Retained Earnings	Equity Instruments through OCI	Debt Instruments through OCI	Total
Balance at the beginning of the reporting period i.e. 1st April, 2020	11,48,81,725	2,55,19,464	20,00,000	1,69,03,533	11,360	-	15,93,16,082
Total Comprehensive Income for the year	-	-	-	9,79,832	11,080	-	9,90,912
Transfer (to) / from Retained Earnings	-	-	-	-	-	-	-
Dividend paid on Equity Shares	-	-	-	-	-	-	-
Tax on Dividend paid on Equity Shares	-	-	-	-	-	-	-
					-		-
Balance at the end of the reporting period i.e. 31st March, 2021*	**11,48,81,725**	**2,55,19,464**	**20,00,000**	**1,78,83,365**	**22,440**	**-**	**16,03,06,994**

***Refer Note 10 (Other Equity) for nature and purpose of reserves.**

As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

On behalf of the Board of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
Ankita Mata
Company Secretary
M. No.: A56788

NOTE 9. Equity Share Capital **(Amount in Rupees)**

Particulars	as at 31st March, 2021		as at 31st March, 2020	
	Number of Shares	Amount	Number of Shares	Amount
Authorised				
Equity Shares of Rs. 10 each	34,50,000	3,45,00,000	34,50,000	3,45,00,000
Preference shares of Rs. 10 each	50,000	5,00,000	50,000	5,00,000
Total	**35,00,000**	**3,50,00,000**	**35,00,000**	**3,50,00,000**
Issued and Subscribed				
Equity Shares of Rs. 10 each	30,08,320	3,00,83,200	30,08,320	3,00,83,200
Paid up				
Equity Shares of Rs. 10 each*	26,37,420	2,63,74,200	26,37,420	2,63,74,200
Add: Forfeited shares (amount originally paid up on 370900 equity shares of Rs. 10 Each (previous year 370900)	3,70,900	9,34,399	3,70,900	9,34,399
Total	**30,08,320**	**2,73,08,599**	**30,08,320**	**2,73,08,599**

*Out of the above Equity shares -
(A) 3,36,600 Equity Shares issued as fully paid up bonus shares on 30/09/1992 by capitalization out of Profit and Loss A/c aggregating to Rupees 33,66,000/-.

(B) 6,41,520 Equity Shares allotted as fully paid Bonus shares on 30/07/1994 aggregating to Rupees 64,15,200/- by capitalization of Rupees 15,66,080/- out of profit and loss a/c and Rupees 38,49,120/- out of revaluation reserve and Rupees 10,00,000/- out of general reserve.

9.1 Terms and rights attached to equity shares:

The Company has one class of equity shares having a par value of Rupees 10 per share. Each shareholder is eligible for one vote per share held.

In the event of liquidation of the Company the holder of equity shares will be entitled to receive remaining assets of the company. The distribution will be in proportion to the number of equity shares held by the shareholder.

9.2 A reconciliation of the number of equity shares outstanding at the beginning and at the end of the year (In Number)

Particulars	as at 31st March, 2021	as at 31st March, 2020
Shares at the beginning of the year	26,37,420	26,37,420
Shares Issued during the year	-	-
Shares bought back during the year	-	-
Shares at the end of the year	**26,37,420**	**26,37,420**

9.3 Details of shareholders holding more than 5% of the shares in the Company

Particulars	as at 31st March, 2021		as at 31st March, 2020	
	Number of Shares	% of Holding	Number of Shares	% of Holding
Madan Paliwal (Miraj) Family Foundation	12,76,340	48.39%	12,76,340	48.39%
Sushila Devi Paliwal	1,91,650	7.27%	1,91,650	7.27%
Shri Kalyan Holdings Limited	1,41,200	5.35%	1,41,200	5.35%

NOTE 10. Other Equity **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
Capital Reserves		
Opening balance	11,48,81,725	11,48,81,725
Add/(Less) : Changes during the year	-	-
Closing balance	**11,48,81,725**	**11,48,81,725**
Securities Premium		
Opening balance	2,55,19,464	2,55,19,464
Add/(Less) : Changes during the year	-	-
Closing balance	**2,55,19,464**	**2,55,19,464**
General Reserve		
Opening balance	20,00,000	20,00,000
Add/(Less) : Changes during the year	-	-
Closing balance	**20,00,000**	**20,00,000**
Equity Instruments Through Other Comprehensive Income		
Opening balance	11,360	1,64,196
Add/(Less) : Changes during the year	11,080	(1,52,836)
Closing balance	**22,440**	**11,360**
Retained Earnings		
Opening Balance	1,69,03,533	1,47,18,575
(+) Net profit for the Current Year	9,79,832	21,84,958
Closing balance	**1,78,83,365**	**1,69,03,533**
Total	**16,03,06,994**	**15,93,16,082**

Nature and Purpose of Reserves:

Capital Reserves

This reserve represents the remission/waiver in the principal term loan amount due to the Bank of India amounting Rs. 1085.32 Lakhs and remission/waiver of the promoters contributions amounting Rs. 63.50 Lakhs, at the time of one time settleent of dues of Bank of India.

Securities Premium
This reserve represents the premium on issue of shares and can be utilised in accordance with the provisions of the Companies Act, 2013.

General Reserve
This reserve is created by transfer of Cash Subsidy Reserve (Central Investment Subsidy) since having become a part of shareholders funds upon fulfillment of condition of terms of settlement scheme.

Equity Instruments Through Other Comprehensive Income
Change in fair value of equity instruments through other comprehensive income.

Retained Earnings
Retained earnings represents the cumulative undistributed profits of the Group and can be utilised in accordance with the provisions of the Companies Act, 2013.

NOTE 11. Non Current Liabilities-Provisions **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(a) Provision For Employee Benefits:		
(i) Provision for Leave Encashment	97,952	89,016
(ii) Provision for Gratuity	7,27,821	5,47,577
Total	**8,25,773**	**6,36,593**

NOTE 12. Calculation of Deferred Tax Liability **(Amount in Rupees)**

Major components of Deferred Tax Assets and Deferred Tax Liabilities	2020-21	2019-20
(A) Deferred Tax Assets		
On account of Carry forward losses, Unabsorbed Depreciation and others under the I T Act, 1961	12,129	12,129
On account of other items disallowed u/s 43B of The Income Tax Act, 1961	2,22,493	1,70,238
Total (A)	**2,34,622**	**1,82,367**
(B) Deferred Tax Liabilities		
On account of Difference between WDV of Fixed assets as per Income Tax and Companies Act.	20,83,949	19,67,600
Total (B)	**20,83,949**	**19,67,600**
Deferred Tax Asset /(Liability) (Net) (A) - (B)	(18,49,327)	(17,85,233)
DTA / (DTL) to be recognized in books	(18,49,327)	(17,85,233)
Opening Balance in DTA/(DTL) A/c	(17,85,233)	(7,76,202)
Deferred Tax Liability recognised in Statement of Profit & Loss	**64,094**	**10,09,031**

NOTE 13. Other Current Liabilities **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(a) Other Payables :		
(i) Salary and Other benefits Payables	1,40,179	-
(ii) Creditor for expenses	2,000	32,169
(ii) Payables for expenses	1,12,478	1,30,248
(iii) Statutory Dues :		
GST Payable	96,301	14,401
TDS Payable	14,745	11,385
PF Payable	7,200	7,260
Total	**3,72,903**	**1,95,463**

NOTE 14. Other Current Liabilities-Provisions **(Amount in Rupees)**

Particulars	as at 31st March, 2021	as at 31st March, 2020
(a) Provision for Employee Benefits		
(i) Provision for Bonus	13,644	9,217
(ii) Provision for Leave Encashments	16,325	8,952
(iii) Staff Welfare fund	42,045	42,045
Total	**72,014**	**60,214**

NOTE 15. Revenue from Operations **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Sale of Services	14,55,000	9,60,000
Total	**14,55,000**	**9,60,000**

NOTE 15.1 Particulars of Sale of Service **(Amount in Rupees)**

Particulars	2020-21	2019-20
(i) Rental Income	14,55,000	9,60,000
Total	**14,55,000**	**9,60,000**

NOTE 16. Other Income **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Interest Income	57,89,958	83,64,347
(b) Other Non-Operating Income:		
(i) Net gain on sale of Investments	82,569	8,75,690
Total	**58,72,527**	**92,40,037**

NOTE 17. Employee Benefits Expense **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Salaries and Wages	24,58,762	36,41,664
(b) Contribution to Provident and Other Funds	92,180	95,848
(c) Staff Welfare Expenses	18,639	20,304
Total	**25,69,581**	**37,57,816**

NOTE 18. Finance Costs **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Interest:		
(i) Interest on Income Tax	-	2
(ii) Other Interest	-	9,200
Total	**-**	**9,202**

NOTE 19. Depreciation and Amortisation Expenses **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Depreciation on Property, Plant and Equipment	6,68,515	7,05,455
(b) Amortisation of Intangible Assets	926	1,000
Total	**6,69,441**	**7,06,455**

NOTE 20. Other Expenses **(Amount in Rupees)**

Particulars	2020-21	2019-20
(a) Advertisement Expenses	53,602	68,434
(b) Payment to Auditor	50,000	50,000
(Refer Note No. 21 (iii))		
(c) Bank Charges & Commission	1,033	89
(d) Legal & Professional Expenses	4,88,356	5,35,532
(e) Rent	1,05,000	1,30,000
(f) Repair & Society Charges -Building	1,08,107	1,07,720
(g) Repair & Maintainance - Others	20,765	52,783
(h) Insurance	52,537	58,700
(i) Printing and Stationery	28,350	76,777
(j) Rates and taxes (excluding taxes on income)	1,37,828	1,34,872
(k) Share of losses in Partnership Firm	5,28,480	8,35,585
(l) Telephone & Internet Expenses	21,188	20,795
(m) Vehicle Operating and maintenance	1,48,553	2,87,387
(n) Loss on Impairment of Assets - CWIP	5,52,934	-
(o) Office and Miscellanous Expenses	87,720	1,21,659
Total	**23,84,453**	**24,80,333**

NOTE 21: Additional and other information

I The company has substantial revenue from Rental of Properties and Interest income during the reporting period.

II Dues to Small scale, micro and medium enterprises

Government of India has promulgated an Act namely The Micro, Small and Medium Enterprise Development Act, 2006 which comes into force with effect from October 02, 2006. As per the act, the Company is required to identify the Micro, Small and Medium Suppliers and pay them interest on overdue beyond the specified period irrespective of terms agreed with the suppliers. The Company has sent the confirmation letters to its suppliers at the year end, to identify the supplier registered with the Act. As per the information available with the Company, none of the supplier has confirmed that they have registered with the Act. In view of this, the liability of interest has neither been provided nor is required disclosure done.

(Amount in Rupees)

III	**Payments to the Auditors as**	**31st March, 2021**	**31st March, 2020**
	(i) Audit Fees	40,000	40,000
	(ii) for Company Law Matters	10,000	10,000
	Total	**50,000**	**50,000**

IV The Company has entered into Partnership under the name of "M/s. S S Developers" (Formerly known as Miraj Developers) through Partnership Deed dated 05.03.2007. Details of the same are given below:

(Amount in Rupees)

Name of the Partners	**Share of Profit / Loss (%)**	**Partner's capital a/c as at 31.03.2021**	**Partner's current a/c As at 31.03.2021**
Asia Pack Limited	10%	3,77,14,855	(46,11,735)
Mr. Sanjeev Maloo	50%	60,17,033	(1,41,57,481)
Miraj Developers Limited	40%	12,40,53,630	1,23,51,959
Total	100%	16,77,85,518	(64,17,257)

V Earning per share:

(Amount in Rupees)

Particulars	**2020-21**	**2019-20**
Profit after taxation	9,79,832	21,84,958
Weighted average number of Paid up Equity Shares outstanding during the year	26,37,420	26,37,420
Basic and Diluted Earning per Equity Share	**0.37**	**0.83**

VI Impact of COVID-19:

The COVID -19 pandemic is rapidly spreading throughout the world. The operations of the Company were impacted, due to shutdown of office and factory following nationwide lockdown by the Government of India. The Company has evaluated impact of this pandemic on its business operations and financial position and based on its review of current indicators of future economic conditions, there is no significant impact on its financial results as at 31st March 2021. However, the impact assessment of COVID-19 is a continuing process given the uncertainties associated with its nature and duration and accordingly the impact may be different from that estimated as at the date of approval of these financial results. The Company will continue to monitor any material changes to future economic conditions.

VI Segment Reporting:

There is only one business segment and one geographical segment accordingly segment information as per the guidelines of IND AS-108 is not required to be disclosed.

a. Primary Segment (by business Segment)

Segments	**Activity**
Real Estate	Real estate activities

b. Secondary Segment (by geographical locations)

During the period under report, the Company has engaged in its business primarily within India. The conditions Prevailing in India being uniform, no separate geographical disclosure is considered necessary.

VII Related Party Disclosures: In accordance with the disclosure requirements of Indian Accounting Standard-24 "Related Party Disclosures" the details of related party transactions are given below:

A. Relationship

Particulars	**Name of Entities**
(a) Related parties where Control exists through common director	Madan Paliwal (Miraj) Family Foundation
	Miraj Pipes And Fittings Private Limited

or substantial ownership or common control etc:	Miraj Products Private Limited	
	Miraj Developers Limited	
	S S Developers (Formerly known as Miraj Developers)	
	Miraj Projects Limited	
	Aacharan Enterprises Private Limited	
	Miraj Business Development Private Limited	
	Miraj Multiservices Limited (Formerly known as Miraj Stationery Products Limited)	
(b) Key Management Personnel:	**Name of KMP**	**Designation**
	Revant Purbia (Resigned w.e.f. 31-01-2021)	CFO / Director
	Pushpendra Jain (Appointed w.e.f 01-02-2021)	CFO /Additional Director
	Jitendra Purohit	CEO
	Prakash Chandra Purohit	Director
	Kulbir Singh Pasricha (Resigned w.e.f. 14-02-2020)	Director
	Sunil Upadhayay	Director
	Prabhjeet Kaur	Director
	Ankita Mata (Appointed w.e.f 01-08-2020)	Company Secretary
	Ashok Ranjan Mishra (Resigned w.e.f 30-11-2019)	Company Secretary
	Arpit Lodha (Appointed w.e.f 01-12-2019 and Resigned w.e.f 31-07-2020)	Company Secretary

Note: Relevant Related party relationship have been identified and reviewed by the Management for the current reporting period with whom transaction made

B. Transactions carried out with related parties referred in 'A' above, in ordinary course of business and arm's length basis:

(Amount in Rupees)

Particulars	**Relationship**	**FY 2020-21**	**FY 2019-20**
Payments for Rent, Repairs and Maintenance, and Payment for Services/Goods			
Miraj Products Private Limited	Enterprises are under common control	1,05,000	2,36,200
Aacharan Enterprises Private Limited	Enterprises are under common control	43,680	38,808
Miraj Business Development Private Limited	Enterprises are under common control	4,471	3,919
Income from Loans and advances			
Aacharan Enterprises Private Limited	Enterprises are under common control	20,26,065	6,25,526
Miraj Pipes And Fittings Private Limited	Enterprises are under common control	36,00,415	76,98,377
Loans and advances Given			
Miraj Pipes And Fittings Private Limited	Enterprises are under common control	-	5,00,00,000
Aacharan Enterprises Private Limited	Enterprises are under common control	2,38,00,000	1,01,00,000
Jitendra Purohit	Key Management Personnel	1,30,000	-
Loans and advances Received Back			
Miraj Pipes And Fittings Private Limited	Enterprises are under common control	2,62,00,000	5,45,00,000
Jitendra Purohit	Key Management Personnel	90,000	-
Remunerations			
Revant Purbia	Key Management Personnel	7,04,340	5,47,140
Jitendra Purohit	Key Management Personnel	8,51,256	7,76,947
Ashok Ranjan Mishra	Key Management Personnel	-	14,00,392
Arpit Lodha	Key Management Personnel	1,01,758	94,960
Ankita Mata	Key Management Personnel	1,90,125	-
Pushpendra Jain	Key Management Personnel	99,280	-
Mobile Advances			
Arpit Lodha	Key Management Personnel	-	2,555
Ankita Mata	Key Management Personnel	1,649	-
Pushpendra Jain	Key Management Personnel	487	-
Reimbursement of Expenses			
Revant Purbia	Key Management Personnel	1,921	2,000
Jitendra Purohit	Key Management Personnel	2,000	2,000
Arpit Lodha	Key Management Personnel	445	444
Ankita Mata	Key Management Personnel	777	-
Pushpendra Jain	Key Management Personnel	324	-
Profit /(Loss) From Partnership Firm			
S S Developers	Partnership Firm of Entity	(5,28,480)	(8,35,585)
Closing Balances:-			
Loans and advances Given*			
Aacharan Enterprises Private Limited	Enterprises are under common control	3,63,37,083	1,06,62,973
Miraj Pipes And Fittings Private Limited	Enterprises are under common control	4,82,87,975	7,11,57,591
Revant Purbia	Key Management Personnel	-	2,921
Jitendra Purohit	Key Management Personnel	40,827	2,827
Arpit Lodha	Key Management Personnel	-	2,111
Ankita Mata	Key Management Personnel	872	-
Pushpendra Jain	Key Management Personnel	163	-

Creditor for Expenses			
Aacharan Enterprises Private Limited	Enterprises are under common control	2,000	-
Investments			
SS Developers	Partnership Firm of Entity	3,31,03,119	3,36,31,599
Miraj Developers Limited	Enterprises are under common control	4,65,58,125	4,65,58,125
Miraj Projects Limited	Enterprise in which director might exercise significant influence	2,00,000	2,00,000
Miraj Multiservices Limited	Enterprises are under common control	1,75,000	1,75,000

Loans / advances given to Key Management Personnel under the terms of employment.

VIII Capital work in Progress:
In the earlier years when the company was engaged into business activity of manufacturing PE Tarpaulin and PP/HDPE woven sacks, it also embarked upon setting up a weaving unit incurring substantial cost for its implementation which later in the interim stages had to be suspended due to constraints of financing of weaving unit and subsequently abandoned in view of disposal of entire assets relating to PE Tarpaulin/PP/HDPE woven sack manufacturing.

With the aforesaid background of events, the company could neither liquidate its investment into the un commissioned weaving division nor could proceed further to complete setting up of the said un commissioned weaving division since by then the entire projections and industry economics had undergone substantial change. After the change of management in FY 2005-06, the new management also explored possibility for a best possible commercial realization of the value of cost featuring as Capital work in Progress in respect of the un commissioned weaving division but failed in view of the changed industry requirements, technology up gradation and resultant cost economics.

Consequent to all the aforesaid, in F.Y. 2006-07, the management had taken a conscious decision to finally abandon the said un-commissioned weaving division and realize whatever salvages value it can fetch for all such un commissioned equipments. Value of Capital work in Progress has therefore been represented net of provision for estimated losses provided in financial year 2005-06 and actual write off of unrealized value of capital work in progress totaling Rs. 1,02,62,218/- during financial year 2007-08 and Rs. 5,52,934/- during the financial year 2020-21, against such provision of impairment losses.

IX Value of imports calculated on CIF basis: There is Nil import of capital items and other material during the current and previous reporting period.

X Income and Expenditure in foreign currency: No Foreign income earned and expensed during the current and previous reporting period.

XI Recognition of Financial Instruments as per IND AS 109 on Fair Value at Comprehensive Income: The Financial instruments has been recognised at Fair value and Income in this respect has been recognised at below the line item in Statement of Profit & Loss amounting to Rs. 11,080/- in this respect the Calculation has been done in Notes 20A of Profit & Loss and Sub Note 2B.4 of Note 1 of Financial Statements for Summary of Significant Accounting Policies.

XII In the opinion of management all the assets and Liabilities have been adequately identified and are approximately of the value as stated by the management and such assets or liabilities have been grouped & presented in the financial statement as per the management estimation in respect to their nature and term, If realized in the ordinary course of business, unless otherwise stated. In the opinion of management, the provisions for all liabilities have been materially identified and are adequately provided and not in excess / shortage of the amount reasonably necessary.

Signatures to Note 21 which form an integral part of the Financial Statements

As per our report of even date

For Vinod Singhal & Co. LLP
Chartered Accountants
Firm Registration Number: 005826C/C400276

Sd/-
FCA Prateek Goyal
Partner
Membership No. : 411040

UDIN: 21411040AAAACK6146
Place: Nathdwara
Date: 30.06.2021

For and on behalf of the Board of Directors of Asia Pack Limited

Sd/-
Prakash Chandra Purohit
Director
DIN:01383197

Sd/-
Jitendra Purohit
CEO
PAN: AQVPP1650Q

Sd/-
Pushpendra Jain
Additional Director and CFO
DIN: 03228950

Sd/-
Ankita Mata
Company Secretary
M. No.: A56788

Form No. MGT-11

Proxy form

[Pursuant to section 105(6) of the Companies Act, 2013 and rule 19(3) of the Companies (Management and Administration) Rules, 2014]

Name of the member(s):	
Registered address:	
E-mail Id:	
Folio No./ Client ID:	
DP ID:	

I/We, being the member(s) of.....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	

As my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the 36th Annual General Meeting of the Company on **Thursday, 30th day of September, 2021 at 11.00 A.M.** at the registered office of the company situated at 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301 and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolution No.	Resolution	Vote (Optional See Note 2) (Please mention no. of Shares)		
		For	Against	Abstain
ORDINARY BUSINESS				
1.	TO RECEIVE, CONSIDER AND ADOPT THE FINANCIAL STATEMENTS OF THE COMPANY FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021 AND THE REPORTS OF THE BOARD OF DIRECTORS AND AUDITORS THEREON			
2.	TO APPOINT A DIRECTOR IN PLACE OF MR. PRAKASH CHANDRA PUROHIT (DIN: 01383197) WHO RETIRES BY ROTATION AND BEING ELIGIBLE, OFFERS HIMSELF FOR RE-APPOINTMENT			
SPECIAL BUSINESS				
3.	APPOINTMENT OF MR. PUSHPENDRA JAIN (DIN: 03228950) AS DIRECTOR [PROFESSIONAL-EXECUTIVE] OF THE COMPANY			
4.	APPROVAL OF REMUNERATION OF MR. PUSHPENDRA JAIN (DIN: 03228950), DIRECTOR CUM CFO OF THE COMPANY			
5.	RATIFICATION OF RELATED PARTY TRANSACTIONS ENTERED DURING THE FINANCIAL YEAR 2020-2021			
6.	IN-PRINCIPAL APPROVAL FOR LOAN TO DIRECTORS, ETC.			

Signed this.....day of.....2021

Affix Revenue Stamp

....

Signature of Member Signature of Proxy holder(s)

Notes:

1. This form of proxy, in order to be effective should be duly stamped, completed, signed and deposited at the registered office of the Company, not less than 48 hours before the commencement of the meeting.
2. It is optional to indicate your preference. If you leave the 'for', 'against' or 'abstain' column blank against any or all the resolutions, your proxy will be entitled to vote in the manner as he/she may deem appropriate.

ATTENDANCE SLIP

36th Annual General Meeting dated 30th September, 2021

Member's Folio/DP ID-Client ID No.	:	
Name of First named Member / Proxy / Authorised Representative	:	
Name of Joint Member(s), if any:	:	
No. of shares held	:	

I/we certify that I/we am/are member(s) / proxy / authorised representative for the member(s) of the Company.

I/we hereby record my/our presence at the 36th Annual General Meeting of the Company on **Thursday, 30th day of September, 2021 at 11.00 A.M.** at the registered office of the company situated at 3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara, Rajsamand, Rajasthan, India, PIN-313301

.....
Signature of First holder / Proxy / Authorised Representative

.....
Signature of 1st Joint holder

.....
Signature of 2nd Joint holder

Note(s):

1. Please sign this attendance slip and hand it over at the Attendance Verification Counter at the MEETING VENUE.
2. Only shareholders of the Company and/or their Proxy and/or their Authorised Representative will be allowed to attend the Meeting.
3. Members are requested to bring their copies of the Annual Report to the Meeting.

ELECTRONIC VOTING PARTICULARS

Users who wish to opt for e-voting may use the following login credentials:

REVEN (Remote e-Voting Event No.)	User ID	Password /PIN
117079		

Note: Please read instructions given at Notice of 36th Annual General Meeting carefully before voting electronically.

Route map of the venue of the 36th Annual General Meeting of Asia Pack Limited

Asia Pack Limited
3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara
Rajsamand, Rajasthan, India, PIN-313301

If undelivered,
Please return to Registered Office of the Company at:
Asia Pack Limited
3rd Floor, Miraj Campus, Uper Ki Oden, Nathdwara
Rajsamand, Rajasthan, India, PIN-313301