SMART FINSEC LIMITED

(Formerly Known as Kevalin Securities Limited)
Registered Office:- FC-02, 4th Floor, TDI Mall,
Vishal Enclave, Rajouri Garden, New Delhi-110027
CIN:- L74899DL1995PLC063562
Phone:-011- 25167071, 45004425
Email Id:-smartfinsec@gmail.com

Date: - 28/09/2021

To
The Stock Exchange, Mumbai
Corporate Relationship Department
Rotunda Building
PJ Towers, Dalal Street Fort
Mumbai -400 001

Scrip Code:-539494.

Dear Sir/ Mam,

Sub:- Revised 26th Annual Report of Smart Finsec Ltd.

With Reference to our letter dated September 07th, 2021 regarding submission of Annual Report, In Compliance with the requirements under Regulation 34 of the SEBI (Listing Obligation & Disclosures requirements) Regulations, 2015, we are hereby submitting you the revised 26th Annual Report of the Company.

We request you to Kindly take on the record.

Thanking You,
Yours Faithfully
For SMART FINSEC Limited

(Priyanka Sharma)
Company Secretary

26th
ANNUAL REPORT

2020-2021

SMART FINSEC LTD.

BOARD OF DIRECTORS & KEY MANAGERIAL PERSONNEL (KMP)

Mr. Arun Khera	Managing Director	(DIN-00055694)
Mrs. Raman Khera	Director	(DIN-00055728)
Ms. Vimmi Sachdev	Director	(DIN-017120510)
Mrs. Sangita Jain	Director	(DIN-07045132)
Mr. Arjun Pahwa	Director	(DIN- 07909675)

KMP OF THE COMPANY

Mrs. Priyanka Sharma	Company Secretary & Compliance Officer
Mrs. Shashi Sharma	Chief Financial Officer of the Company

AUDITORS

Chartered Accountants
H. K Dua & Co.
309, Jyoti Shikhar, 8 District Centre,
Janakpuri, New Delhi-110058

REGISTERED OFFICE:

FC-02,4th Floor, TDI Mall, Vishal Enclave,
Rajouri Garden, New Delhi-110027.
E-Mail Id:- smartfinsec @gmail.com

REGISTRAR AND TRANSFER AGENT

M/s Alankit Assignments Limited
1E/13, Alankit Heights, RTA Division,
Jhandewalan Extension, New Delhi-110055.

CONTENTS

Notice 1-4

Directors Report 5-23

Management Discussions & Analysis Report 24

Independent Auditors' Report 25-32

Statement of Profit & Loss 33-35

Balance Sheet 36-40

Cash Flow Statement 41

SMART FINSEC LIMITED

Registered Office:- FC-02, 4th FLOOR, TDI MALL, VISHAL ENCLAVE,
RAJOURI GARDEN, NEW DELHI-110027
Phone:-011- 25167071, Email Id:-smartfinsec@gmail.com
CIN:- L74899DL1995PLC063562

Notice is hereby given that the 26th Annual General Meeting of the Company will be held on Thursday 30th September, 2021 at 10:00 A.M. at FC-02, 4th Floor, TDI Mall, Vishal Enclave, Rajouri Garden, New Delhi-110027 to transact the following business:

ORDINARY BUSINESS:-

1. To receive, consider and adopt the Audited Financial Statements of the Company for the Financial Year ended March 31, 2021, the reports of the Board of Directors and Auditors thereon;

2. To consider and if thought fit, to pass the following resolution as an Ordinary Resolution:

   "RESOLVED THAT Mrs. Raman Khera (DIN: 00055728) Director, who retires by rotation and being Eligible for re-appointment, be and is hereby re-appointed as a Director of the Company".

Place: New Delhi

Date: 03-09-2021

For and on behalf of the Board of Directors

For Smart Finsec Limited

Sd/-
(Priyanka Sharma)
Company Secretary

NOTES:

1. **A MEMBER ENTITLED TO ATTEND AND VOTE AT THE ANNUAL GENERAL MEETING (AGM) IS ENTITLED TO APPOINT A PROXY TO ATTEND AND VOTE ON A POLL, IF ANY, INSTEAD OF HIMSELF/HERSELF AND SUCH PROXY NEED NOT BE A MEMBER OF THE COMPANY.THE PROXY FORM DULY COMPLETED AND SIGNED MUST BE RECEIVED AT THE REGISTERED OFFICE OF THE COMPANY, NOT LESS THAN FORTY EIGHT (48) HOURS BEFORE THE COMMENCEMENT OF THE AGM. BLANK ATTENDENCE SLIP, PROXY FORM AND ROUTE MAP OF THE VENUE OF THE MEETING IS ATTACHED.**

   • A person can act as proxy on behalf of members not exceeding fifty (50) and holding in the aggregate not more than (10%) ten percent of the total share capital of the Company. A member holding more than ten percent of the 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.

2. The Register of Members and Share Transfer Books of the Company will remain close from September 24, 2021 to September 30, 2021 (both days inclusive).

3. Shareholders seeking any information with regard to accounts are requested to write to the Company at least 10 days before the meeting so as to enable the management to keep the information ready.

4. Members are requested to:

   a. note that copies will not be distributed at the AGM and they will have to bring their copies of Annual Report;

   b. bring the Attendance Slip at the venue duly filled-in and signed for attending the meeting, as entry to venue of AGM will be strictly on the basis of the Entry Slip, which will be available at the meeting venue;

   c. quote their Folio / Client ID & DP ID Nos. in all correspondence with the Company / R&TA;

   d. Note that no gifts / coupons will be distributed at the AGM.

5. Members who hold shares in physical are requested to notify immediately the change of their address

and bank particulars to the R & T Agent of the Company. In case shares held in dematerialized form, the information regarding change of address and bank particulars should be given to their respective Depository Participant.

6. Members desirous of making a nomination in respect of their shareholding in the Company, as permitted under Section 72 of the Companies Act, 2013, are requested to write to R & T Agent of the Company in Form SH -13 as prescribed in the Companies (Share Capital and Debentures) Rules, 2014. Blank Nomination form is available at the registered office of the company. In case of shared held in dematerialized form, the nomination form has to be lodged directly with the respective Depository Participant (DP

7. Process and manner for members opting for voting through Electronic means:

   i. In compliance with the provisions of Section 108 of the Companies Act, 2013 read with Rule 20 of the Companies (Management and Administration) Rules, 2014, Regulation 44 of SEBI (LODR) Regulation, 2015 and Secretarial Standards on General Meeting issued by ICSI, the Company is pleased to offer the facility of voting through electronic means and the business set out in the Notice above may be transacted through such electronic voting. The facility of voting through electronic means is provided through the e-voting platform of National Securities Depository Limited ("remote e-voting").Those Shareholders who do not opt to cast their vote through e-voting, may opt their ballot process at the AGM.

   ii. Members whose names are recorded in the Register of Members or in the Register of Beneficial Owners maintained by the Depositories as on the Cut-off date i.e. September 23rd, 2021, shall be entitled to avail the facility of remote e-voting as well as voting at the AGM. Any recipient of the Notice, who has no voting rights as on the Cut-off date, shall treat this Notice as intimation only.

   iii. A person who has acquired the shares and has become a member of the Company after the dispatch of the Notice of the AGM and prior to the Cut-off date i.e. September 23rd, 2021, shall be entitled to exercise his/her vote either electronically i.e. remote e-voting or through the Poll Paper at the AGM by following the procedure mentioned in this part.

   iv. The remote e-voting will commence on September 27th, 2021 at 09.00 a.m. and will end on September 29th, 2020 at 5.00 p.m. During this period, the members of the Company holding shares either in physical form or in demat form as on the Cut-off date i.e. September 23rd, 2021, may cast their vote electronically. The members will not be able to cast their vote electronically beyond the date and time mentioned above and the remote e-voting module shall be disabled for voting by NSDL thereafter.

   v. Once the vote on a resolution is cast by the member, he/she shall not be allowed to change it subsequently or cast the vote again.

   vi. The facility for voting through Poll Paper would be made available at the AGM and the members attending the meeting who have not already cast their votes by remote e-voting shall be able to exercise their right at the meeting through Poll Paper. The members who have already cast their vote by remote e-voting prior to the meeting, May also attend the meeting, but shall not be entitled to cast their vote again.

   vii. The voting rights of the members shall be in proportion to their share in the paid up equity share capital of the Company as on the Cut-off date i.e. September 23rd, 2021.

   viii. The Company has appointed CS Pawan Kumar Mishra, Practicing Company Secretary (Membership No. FCS: 4305; CP No: 16222), to act as the Scrutinizer for conducting the remote e-voting process in a fair and transparent manner.

   ix. The procedure and instructions for remote e-voting are, as follows:

The procedure to login to e-Voting website is given below:

How do I vote electronically using NSDL e-Voting system?

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

Step 1 : Log-in to NSDL e-Voting system at https://www.evoting.nsdl.com/

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

Details on Step 1 is mentioned below:

How to Log-into 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 'Shareholders' section.
3. A new screen will open. You will have to enter your User ID, your Password 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 holdshares 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. Your password details 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, your 'initial password' is communicated to you on your postal address.

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.

Physical User Reset Password?

b) "(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.

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.

Details on Step 2 is given below:

How to cast your vote electronically on NSDL e-Voting system?

1. After successful login at Step 1, you will be able to see the Home page of e-Voting.Click on e-Voting. Then,click on Active Voting Cycles.
2. After click on Active Voting Cycles, you will be able to see all the companies "EVEN" in which you are holding shares and whose voting cycle is in active status.
3. Select "EVEN" of company for which you wish to cast your vote.
4. Now you are ready for e-Voting as the Voting page opens.
5. 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.
6. Upon confirmation, the message "Vote cast successfully" will be displayed.
7. You can also take the printout of the votes cast by you by clicking on the print option on the confirmation page.
8. Once you confirm your vote on the resolution, you will not be allowed to modify your vote.

Contact Details

Company	**SMART FINSEC LIMITED** Registered Office:- FC-02, 4th Floor, TDI Mall, Vishal Enclave, Rajouri Garden, New Delhi-110027 CIN:- L74899DL1995PLC063562 Phone:-011- 25167071 Email Id:-smartfinsec@gmail.com
Registrar and : Transfer Agent	Alankit Assignments Limited Alankit House, 2E/21, Jhandewalan Extension, New Delhi-110055
e-Voting Agency	National Securities Depository Limited Trade World - A Wing, 4th Floor Kamala Mills Compound, Lower Parel, Mumbai – 400013
Scrutinizer	CS Pawan Kumar Mishra P. K. Mishra & Associates Practicing Company Secretary E-mail ID : pkmishra59@yahoo.com

Place: New Delhi
Date: 03-09-2021

For and on behalf of the Board of Directors
For Smart Finsec Limited

Sd/-

(Priyanka Sharma)
Company Secretary

SMART FINSEC LIMITED

Registered Office:- FC-02, 4th FLOOR, TDI MALL, VISHAL ENCLAVE,
RAJOURI GARDEN, NEW DELHI-110027
Phone:-011- 25167071, Email Id:-smartfinsec@gmail.com
CIN:- L74899DL1995PLC063562

DIRECTORS' REPORT

Dear Shareholders,

Your Directors are pleased to present the 26th Annual Report along with the Audited Financial Statements of your Company for the Financial Year ended on March 31st, 2021.

Financial Performance:

The summarized financial highlight is depicted below:

	2020-2021	**2019-2020**
Revenue from operations:	Rs. 232,200	Rs. 96351
Other Income	Rs. 0	Rs. 0
Depreciation	Rs. 545	Rs. 549.19
Profit/(Loss) before Tax	Rs. 4437	Rs. 3854
Profit/(Loss) after Tax	Rs. 4475	Rs. 3404

There are no material changes and commitments affecting the financial position of the Company between the end of the financial year and the date of this report.

TRANSFER TO RESERVES

Your Company proposes to transfer 8,95,000 amounts from Profit & Loss to the Statutory Reserve.

DIVIDEND

The Board does not recommend and dividend during the Financial Year ended on March 31st, 2021.

SHARE CAPITAL

The paid up Equity Share Capital as on March 31, 2021 was Rs. 3,00,000,00/- (Rs. Three Crore) and 4,80,000 Non-Convertible Cumulative Preference shares of Rs. 100 Each. During the year under review the company has not issued any shares or any convertible instruments.

MATERIAL CHANGES AND COMMITMENTS

The Company has done the process of Sub-Division of Equity Shares of the company, Sub-division approved through the Postal ballot, Result of Postal Ballot declared on 30.07.2021.

SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES

The Company does not have any Subsidiary or an associate company within the meaning of Section 2(87) and 2(6) of the Companies Act, 2013 (“Act”) respectively, as on March 31, 2021.

DIRECTORS & KMP

There is no change in the board of the company during financial year 2020-2021.

DIRECTORS’ RESPONSIBILITY STATEMENT

As required by the Section 134(3)(c) read with the Section 134(5) of the Companies Act, 2013, your directors state that:

(a) In the preparation of the annual accounts, the applicable accounting standards had been followed

along with proper explanation relating to material departures;

(b) The directors had selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent so as to give a true and fair view of the state of affairs of the company at the end of the financial year and of the profit and loss of the company for that period;

(c) The directors had taken a proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013 for safeguarding the assets of the company and for preventing and detecting fraud and other irregularities;

(d) The directors had prepared the annual accounts on a going concern basis;

(e) The directors had laid down internal financial controls to be followed by the company and that such internal financial controls are adequate and were operating effectively; and if the directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

KEY MANAGERIAL PERSONNEL

The following persons are Whole-Time Key Managerial Personnel ('KMP') of the Company in terms of provisions of Section 203 of the Companies Act, 2013:

a. Mr. Arun Khera – Chairman and Managing Director

b. Ms. Priyanka Sharma - Company Secretary

c. Mrs. Shashi Sharma – Chief Financial Officer*

NUMBER OF BOARD MEETINGS

Five meetings of the Board of Directors of your Company were held during the year under review.

EVALUATION OF BOARD PERFORMANCE

Pursuant to the provisions of the Companies Act, 2013 and the corporate governance requirements as prescribed by Securities and Exchange Board of India (“SEBI”) under SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, the Board of Directors has carried out an annual evaluation of its own performance, the Board committees and individual directors. The performance of the Board was evaluated by the Board after seeking inputs from all the directors on the basis of the criteria such as the diversity of the Board, effectiveness of the board processes, information and functioning etc.

The performances of the committees were evaluated by the Board after seeking inputs from the committee members on the basis of the criteria such as the composition of committees and effectiveness of the committee meetings etc. The performance of the individual directors were reviewed on the basis of the criteria's such as contribution of the individual director to the Board and committee meetings like preparedness on the issues to be discussed, meaningful and constructive contribution and inputs in meetings etc.

The performances of non-independent directors, the Board as a whole and of the Chairman were evaluated in a separate meeting of the Independent Directors after taking into account the views of executive directors and the non-executive directors.

INTERNAL FINANCIAL CONTROL

The Company has in place an established internal control system to ensure proper recording of the financial &operational information, the compliance of various internal controls and other regulatory/statutory compliances. All Internal Audit findings and control systems are periodically reviewed by the Audit Committee of the Board of Directors, which provides strategic guidance on Internal Controls.

STATUTORY AUDITORS

M/s. HK DUA & Co., Chartered Accountants (Firm Registration No. 000581N), had been duly appointed as an statutory Auditors of the Company in 23rd AGM held on September 28th, 2018 from Financial

Year 2017-18 to Financial Year 2021-22 .

DIRECTORS' VIEW ON AUDITORS' OBSERVATIONS

The Management responses to the observation of the auditors are explained wherever necessary through appropriate notes to the Accounts is reproduced hereunder in compliance with the relevant legal provisions.

FIXED DEPOSITS

No disclosure or reporting is required in respect to the deposits covered under Chapter V of the Companies Act, 2013, as there were no transactions in respect to the same during the year under review.

RISK MANAGEMENT

There is a continuous process of identifying / managing risks through a Risk Management Process. The measures used in managing the risks are also reviewed. The risks identified by the Company broadly fall in the category of operational risk, regulatory risk, financial & Accounting risk & foreign currency related risks. The risk management process consists of risk identification, risk assessment, risk monitoring & risk mitigation. During the year, measures were taken for the minimization of risks and the Board was informed from the time to time. In the opinion of the Board, none of the said risks which have been identified may threaten the existence of the Company.

AUDIT COMMITTEE

The Audit Committee of the Company consists of Mrs. Sangita Jain, Chairman, Mr. Arjun Pahwa & Mr. Arun Khera. The Board of Directors of your Company has revised its terms of reference to make it in line with the requirements of Section 177 of the Companies Act, 2013 and Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015..

CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION, FOREIGN EXCHANGE EARNINGS & OUTGO

The information pertaining to the conservation of energy, technology absorption and foreign exchange earnings and outgo, as required under Section 134(3)(m) of the Companies Act, 2013 read with the Rule 8(3) of the Companies (Accounts) Rules, 2014 is enclosed as Annexure - A, and forms part of this Report.

PARTICULARS OF EMPLOYEES AND RELATED DISCLOSURE

There was no such employee of the Company who is covered under provisions of Section 197(12) of the Companies Act, 2013 read with Rules 5(2) and 5(3) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014.

PARTICULARS OF LOANS, GUARANTEES OR INVESTMENTS

The Company has not made any investments in securities of other body corporate(s) during the financial year 2020-21.

CONTRACTS OR ARRANGEMENTS WITH RELATED PARTIES

All related party transactions are in ordinary course of business and at arm's length, which are not material in nature. All related party transactions are with the approval of the Audit Committee and periodically placed before the Board for review.

The prescribed Form AOC-2 is enclosed as Annexure - B, and forms part of this Report. Your directors draw the attention of members to Note 24 to the standalone financial statements which set out related party disclosures.

EXTRACT OF ANNUAL RETURN

The details forming part of the Extract of Annual Return in prescribed form MGT-9 is enclosed as Annexure-C and forms part of this Report.

SECRETARIAL AUDIT

Pursuant to the provisions of Section 204 of the Companies Act, 2013 read with the rules made there under, your Company had appointed Mr. Pawan Kumar Mishra, Practicing Company Secretary to undertake the Secretarial Audit of the Company. The Secretarial Audit Report for financial year 2020-21 is annexed, which forms part of this report as **Annexure-D** There were no qualifications, reservation or adverse remarks in the Secretarial Audit Report of the Company.

COMPLIANCE WITH PROVISIONS OF SEXUAL HARRASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION AND REDRESSAL) ACT, 2013

The Company is committed to uphold and maintain the dignity of women employee and it has in place a policy which provides for protection against sexual harassment of women at workplace and for prevention and redressal of such complaints. During the year, no such complaints were received. The Company has also constituted an Internal Compliance Committee under the Sexual Harassment of women at workplace (Prevention, Prohibition and Redressal) Act, 2013.

Committees of Board

Detail of Committees constituted by the board of Directors as per the provision of Company Act 2013 are given in Annexure- E

DISCLOSURE REQUIREMENTS

1. Policy on materiality of related party transactions and dealing with related party transactions is available on the website of the Company.
2. The Company has formulated and published a Whistle Blower Policy to provide Vigil Mechanism for employees including directors of the Company to report genuine concerns, which is available on Company's websitehttp://www.smartfinsec.com/.The provisions of this policy are in line with the provisions of Section 177(9) of the Companies Act, 2013 and the Regulation 22 of the SEBI (Listing Obligation and Disclosures Requirements) Regulation, 2015.
3. There were no significant or material orders passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future.
4. During the year under review, there were no cases reported under the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

ACKNOWLEDGEMENT

The Directors wish to acknowledge and thank the Central and State Governments and all regulatory bodies for their continued support and guidance. The Directors thank the shareholders, customers, business associates, Financial Institutions and Banks for the faith reposed in the Company and its management.

The Directors place on record their deep appreciation of the dedication and commitment of your Company's employees at all levels and look forward to their continued support in the future as well.

For on behalf of the Board
For Smart Finsec Limited

Sd/-
Arun Khera
Managing Director
DIN :- 00055694

Sd/-
Raman Khera
Director
DIN:- 00055728

Place: New Delhi
Date: 03-09-2021

ANNEXURE A

Information regarding Conservation of Energy, Technology Absorption and Foreign Exchange Earnings and Outgo pursuant to Companies (Disclosure of Particulars in the Report of Board of Directors) Rules, 1988 and forming part of Directors' Report.

A. CONSERVATION OF ENERGY

Energy conservation is a very important part of energy planning and its management. This not only saves energy resources for future but also avoids wasteful utilization of energy. Energy conservation initiatives provide solution to the energy crisis, environmental degradation and pollution.

New energy initiatives give greater reliance on non-exhaustible and non-conventional resources of energy in order to conserve exhaustible & conventional resources like coal, petroleum, natural gas etc. Another aspect of energy conservation is to give greater importance on reduction in consumption of energy.

This can be achieved by inculcating change in the individual habits and adoption of latest technology available in vogue. There is a growing gap between supply and demand of electrical power. Needless to say the use of fossil fuels is accompanied with severe and several environmental damages. Due to the liberalization measures of the Government of India, the industrial sector is rapidly growing, thus increasing the energy demand enormously.

In the short run, the only solution to the growing energy deficit is to facilitate good energy saving measures through conservation of power, fuel and water. As industries are the major gutters/ consumers of these resources, the onus should lie on the industrial sector to limit & minimize its demand for energy. The need of the hour is to conserve and preserve the energy resources for future of the mankind.

Your Company is not covered in the Schedule of Industries under rule 2 of the Companies (Disclosure of Particulars in the Report of Board of Directors) Rules, 1988, requiring furnishing of information relating to conservation of energy. However realizing its importance, the Company has launched a concerted drive for conserving energy. Replacement of worn out wires, control of idle running of engines, and plugging of leakage were some of the measures taken. Besides the measures already taken, efforts are continuing to examine and implement fresh proposals for further conservation of energy. Positive impact of measures already taken has been observed on the costs.

B. TECHNOLOGY ABSORPTION

Company is NBFC so Technology Absorption has not been applicable here.

C. FOREIGN EXCHANGE EARNINGS AND OUTGO

The Company has not earned any income in foreign exchange nor incurred any expenditure in foreign currency during the year under review.

ANNEXURE B

Form No. AOC-2
(Pursuant to clause (h) of sub-section (3) of Section 134 of the Companies Act, 2013 and Rule 8(2) of the Companies (Accounts) Rules, 2014)

(Pursuant to clause (h) of sub-section (3) of section 134 of the Act and Rule 8(2) of the Companies (Accounts) Rules, 2014) This form pertains to the disclosure of particulars of contracts/arrangements entered into by the company with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013including certain arms length transactions under third proviso thereto.

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

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

The contracts or arrangement or transactions entered with the related parties during the financial year 2020-21 were not material and the same were disclosed in the notes to accounts in Note 24, forming part of the financial statements for the year ended 31st March 2021

For and on behalf of the Board of Directors
For Smart Finsec Limited

Sd/-
Arun Khera
Managing Director

Place: New Delhi
Date: 03-09-2021

Annexure - C

FORM NO. MGT 9
EXTRACT OF ANNUAL RETURN

As on financial year ended on 31.03.2021

Pursuant to Section 92 (3) of the Companies Act, 2013 and rule 12(1) of the Company (Management & Administration) Rules, 2014.

I. REGISTRATION & OTHER DETAILS:

1.	CIN	**L74899DL1995PLC063562**
2.	Registration Date	**May 2, 1995**
3.	Name of the Company	**Smart Finsec Limited**
4.	Category/Sub-category of the Company	**Company Limited by Shares / Indian Non – Government Company**
5.	Address of the Registered office & contact details	**FC-02, 4th Floor, TDI Mall, Vishal Enclave, Raja Garden, New Delhi-110027.**
6.	Whether listed company	**Yes, BSE Limited**
7.	Name, Address & contact details of the Registrar & Transfer Agent, if any.	**Alankit Assignments Limited RTA Division, Jhandewalan, New Delhi-1100055 Phone – 011-42541234/23451234**

II. PRINCIPAL BUSINESS ACTIVITIES OF THE COMPANY (All the business activities contributing 10 % or more of the total turnover of the company shall be stated)

S. No.	Name and Description of main products / services	NIC Code of the Product/service	% to total turnover of the company
1	Whole Income Generated from Sale of Bonds/ shares , Rent received& Interest Income	8030,8049	100%

III. PARTICULARS OF HOLDING, SUBSIDIARY AND ASSOCIATE COMPANIES :- N.A

IV. SHARE HOLDING PATTERN (Equity Share Capital Breakup as percentage of Total Equity) Category-wise Share Holding

Category of Shareholders	No. of Shares held at the beginning of the year [As on 1st April, 2020]				No. of Shares held at the end of the year [As on 31-March-2021]				% Change during
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	the year
A. Promoters (1) Indian									
a) Individual/HUF	2163956	0	2163956	72.132%	2163956	0	2163956	72.132%	Nil
b) Central Govt	0	0	0	0	0	0	0	0	0
c) State Govt(s)	0	0	0	0	0	0	0	0	0
d) Bodies Corp.	0	0	0	0	0	0	0	0	0
e) Banks / FI	0	0	0	0	0	0	0	0	0
f) Any other	0	0	0	0	0	0	0	0	0
Total shareholding of Promoter (A)	2163956	0	2163956	72.132%	2163956	0	2163956	72.132%	0

B. Public Shareholding									
1. Institutions									
a) Mutual Funds	0	0	0	0	0	0	0	0	0
b) Banks / FI	0	0	0	0	0	0	0	0	0
c) Central Govt	0	0	0	0	0	0	0	0	0
d) State Govt(s)	0	0	0	0	0	0	0	0	0
e) Venture Capital Funds	0	0	0	0	0	0	0	0	0
f) Insurance Companies	0	0	0	0	0	0	0	0	0
g) FIIs	0	0	0	0	0	0	0	0	0
h) Foreign Venture Capital Funds	0	0	0	0	0	0	0	0	0
i) Others (specify)	0	0	0	0	0	0	0	0	0
Sub-total (B)(1):-	0	0	0	0	0	0	0	0	0
2. Non-Institutions									
a) Bodies Corp.	2051	1000	3051	0.010%	2210	1000	3210	0.11	.01
i) Indian	0	0	0	0	0	0	0	0	0
ii) Overseas	0	0	0	0	0	0	0	0	0
b) Individuals									
I) Individual shareholders holding nominal share capital upto Rs. 2 lakh]	62360	122300	184660	6.15	62884	122300	185184	6.17	.02
ii) Individual shareholders holding nominal share capital in excess of Rs 2lakh	610017	0	610017	20.33%	641334	0	641334	21.38	1.05
c) Others (specify)									
Non Resident Indians	15	6300	6315	.211%	15	6300	6315	.211	–
Overseas Corporate Bodies	0	0	0	0	0	0	0	0	0
Foreign Nationals	0	0	0	0	0	0	0	0	0
Clearing Members	1	0	0	.0%	1	0	1	0	–
HUF	32000	0	32000	1.066%	0	0	0	1.068	-.014
Trusts	0	0	0	0	0	0	0	0	0
Foreign Bodies-DR	0	0	0	0	0	0	0	0	0
Sub-total (B)(2):- Total Public Shareholding (B)=(B)(1)+ (B)(2)	706444	125600	836044	27.87%	706444	129600	836044	27.87	0
C. Shares held by Custodian for GDRs & ADRs	0	0	0	0	0	0	0	0	0
Grand Total (A+B+C)	**2813700**	**186300**	**3000000**	**100%**	**2818200**	**181800**	**3000000**	**100%**	**0**

B. Shareholding of Promoters-

SN	Shareholder's Name	Shareholding at the beginning of the year			Shareholding at the end of the year			% Change shareholding
		No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	No. of Shares	% of total Shares of the company	% of Shares Pledged / encumbered to total shares	during the year
1.	**Arun Khera (HUF)**	372500	12.42	Nil	372500	12.42	Nil	No change during the year
2.	**Arun Khera**	377000	12.57	Nil	377000	12.57	Nil	No change during the year
3.	**Raman Khera**	393800	13.13	Nil	393800	13.13	Nil	No change during the year
4.	**Upasana Khera**	128300	4.28	Nil	128300	4.28	Nil	No change during the year
5.	**Sachit Khera**	564754	18.85	Nil	564754	18.825	Nil	No change during the year
6.	**Sunaina Khera**	327602	10.92	Nil	327602	10.920	Nil	No change during the year

C) Change in Promoters' Shareholding (please specify, if there is no change) - No change during the year

D) Shareholding Pattern of top ten Shareholders:
(Other than Directors, Promoters and Holders of GDRs and ADRs):

S. No.	Shareholder's Name	Shareholding at the beginning of the year		Change in shareholding		Shareholding at the end of the year	
		No. of Shares	% of total Shares	Increase (Decrease)			No. of Shares
1.	**Pramod Arora**	128000	4.27	–	**2.**	**Pramod Arora**	128000
3.	**Asha Gambhir**	113500	3.78	–	**4.**	**Asha Gambhir**	113500
5.	**Jogesh sachdeva**	93700	3.12	–	**6.**	**Jogesh sachdeva**	93700
7.	**Sanjeev Sethi**	90000	3.24	–	**8.**	**Sanjeev Sethi**	90000
9.	**Puja Sachdev**	80599	2.69	-956	**10.**	**Puja Sachdev**	80317
11.	**Shubhash Gambhir**	68000	2.27	–	**12.**	**Shubhash Gambhir**	68000
13.	**Anita Gupta**	36500	–	–	**14.**	**Anita Gupta**	36500
15.	**Mohan Gupta (HUF)**	32000	–	–	**16.**	**Mohan Gupta (HUF)**	32000
17.	**Hardeep Bedi**	8900	.29	–	**18.**	**Hardeep Bedi**	8900
19.	**Rajiv**	4500	.15	–	**20.**	**Rajiv**	4500

E) Shareholding of Directors and Key Managerial Personnel:

S. No.	**Shareholder's of each Directors and each Key Managerial Personnel**	Shareholding at the beginning of the year		Cumulative shareholding during the year	
		No. of shares	% of total shares of the company	No. of shares	% of total shares of the company
1.	Arun Khera				
	At the beginning of the year	377000	12.57		
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment/transfer/ bonus/ sweat equity etc.):	No change during the year.			
	At the end of the year			377000	12.57
2.	Raman Khera				
	At the beginning of the year	393800	13.12		
	Date wise Increase / Decrease in Promoters Shareholding during the year specifying the reasons for increase /decrease (e.g. allotment/transfer/ bonus/ sweat equity etc.):	No change during the year.			
	At the end of the year			393800	13.12

V) INDEBTEDNESS -Indebtedness of the Company including interest outstanding/accrued but not due for payment.

(Rs. in '000)

	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
Indebtedness at the beginning of the financial year				
i) Principal Amount	0	42500	–	42500
ii) Interest due but not paid	–	–	–	–
iii) Interest accrued but not due	–	–	–	–
Total (i+ii+iii)	**–**	**–**	**–**	**–**
Change in Indebtedness during the financial year				
* Addition	–	–	–	–
* Reduction	–	–	–	–
Net Change	–	–	–	–
Indebtedness at the end of the financial year	–	–	–	–
i) Principal Amount	–	–	–	–
ii) Interest due but not paid	–	–	–	–
iii) Interest accrued but not due	–	–	–	–
Total (i+ii+iii)	**–**	**–**	**–**	**–**

VI. REMUNERATION OF DIRECTORS AND KEY MANAGERIAL PERSONNEL-

A. Remuneration to Managing Director, Whole-time Directors and/or Manager:

SN.	Particulars of Remuneration	Name of MD/WTD/ Manager		Total Amount
		Arun Khera (Managing Director)		
1	Gross salary			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	NIL	NIL	NIL
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	NIL	NIL	NIL
	(c) Profits in lieu of salary under section 17(3) Income- tax Act, 1961	NIL	NIL	NIL
2	Stock Option	NIL	NIL	NIL
3	Sweat Equity	NIL	NIL	NIL
4	Commission - as % of profit - others, specify…	NIL	NIL	NIL
5	Others, please specify	NIL	NIL	NIL
	Total (A)	NIL	NIL	NIL

B. Remuneration to other directors

SN.	Particulars of Remuneration	Name of Directors		Total Amount
		Sangita Jain	Arjun Pahwa	
1	Independent Directors	N.A.	N.A.	N.A.
	Fee for attending board committee meetingss	N.A.	N.A.	N.A.
	Commissions	N.A.	N.A.	N.A.
	Others, please specifys	N.A.	N.A.	N.A.
	Total (1)	N.A.	N.A.	N.A.
2	Other Non-Executive Directors	Vimmi Sachdev	Raman Khera	–
	Fee for attending board committee meetingss	N.A.	N.A.	N.A.
	Commissions	N.A.	N.A.	N.A.
	Others, please specifys	N.A.	N.A.	N.A.
	Total (2)	N.A.	N.A.	N.A.
	Total (B)=(1+2)	N.A.	N.A.	N.A.
	Total Managerial Remunerations	N.A.	N.A.	N.A.
	Overall Ceiling as per the Acts	N.A.	N.A.	N.A.

C. REMUNERATION TO KEY MANAGERIAL PERSONNEL OTHER THAN MD/MANAGER/WTD

SN	Particulars of Remuneration	Key Managerial Personnel			
		CEO	CS	CFO	Total
1	Gross salary	N.A.			
	(a) Salary as per provisions contained in section 17(1) of the Income-tax Act, 1961	N.A.	3,03,900	2,32,300	5,36,200
	(b) Value of perquisites u/s 17(2) Income-tax Act, 1961	N.A.	N.A.	N.A.	N.A.
	(c) Profits in lieu of salary under section 17(3) Income-tax Act, 1961	N.A.	N.A.	N.A.	N.A.
2	Stock Option	N.A.	N.A.	N.A.	N.A.
3	Sweat Equity	N.A.	N.A.	N.A.	N.A.
4	Commission	N.A.	N.A.	N.A.	N.A.
	- as % of profit	N.A.	N.A.	N.A.	N.A.
	others, specify…	N.A.	N.A.	N.A.	N.A.
5	Others, please specify	N.A.	N.A.	N.A.	N.A.
	Total	N.A.	3,03,900	2,32,300	5,36,200

VII. PENALTIES / PUNISHMENT/ COMPOUNDING OF OFFENCES:

Type	Section of the Companies Act	Brief Description	Details of Penalty / Punishment/ Compounding fees imposed	Authority [RD / NCLT/ COURT]	Appeal made, if any (give Details)
A. COMPANY					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
B. DIRECTORS					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.
C. OTHER OFFICERS IN DEFAULT					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment	N.A.	N.A.	N.A.	N.A.	N.A.
Compounding	N.A.	N.A.	N.A.	N.A.	N.A.

ANNESURE - D

Form No. MR-3
SECRETARIAL AUDIT REPORT
FOR THE FINANCIAL YEAR ENDED MARCH 31, 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,

Smart Finsec Limited,
FC-02, 4th Floor TDI Mall,
Vishal Enclave, Rajouri Garden,
New Delhi-110027

I have conducted the Secretarial Audit of the compliance of applicable statutory provisions and the adherence to good corporate practice by **Smart Finsec Limited,** (hereinafter called the company). 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 I report that:-

a. Maintenance of Secretarial records is the responsibility of the management of the company. Our responsibility is to express an opinion on these secretarial records based on my audit.

b. I have followed the Audit Practices and processes 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 the secretarial records. I believe that the process and practices, I followed provide a reasonable basis for my opinion.

c. I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.

d. Wherever required, I have obtained the management representation about the compliance of law, rules and regulations and happening of events etc.

e. The Compliance of the provisions of the corporate and other applicable laws, rules and regulations, standards is the responsibility of the management. Our examination was limited to verification of procedures on test basis.

f. The Secretarial Audit Report is neither an assurance as to future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the company.

Based on my verification of the **Smart Finsec Limited** books, papers, minute books, forms and returns filed and other records maintained by the company and also the information provided by the company, its officers, agents and authorized representatives during the conduct of Secretarial Audit, I hereby report that in our 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 **Smart Finsec Limited**, ("the Company") for the Financial Year ended on March 31, 2021 according to the provisions of:

(i) The Companies Act, 2013 (the Act) and the rules made there under;

(i) The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under were duly complied for the period from 1st April 2020 to 31st March 2021.

(ii) The Depositories Act, 1996 and the Regulations and Bye-laws framed there under were duly

complied for the period from 1st April 2020 to 31st March 2021.

(iii) 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 are not applicable on the Company for the Financial Year 2020-21 as disclosed by the management of the Company.

(iv) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act') to the extent applicable to the Company:-

(a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(There was no instance during the period under audit for which the Company was required to file copy of disclosure under the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 as disclosed by the management of the company.)**

(b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(There were no instance during the period under audit for which the Company was required to file copy of continual disclosures under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as disclosed by the Management of the Company.)**

(c) The Securities and Exchange Board of India (Issue of Capital Disclosure Requirements) Regulations, 2009; **(Not Applicable as the company has not issued any further capital under the regulations during the period under review).**

(d) The Securities and Exchange Board of India (Share Based Employee Benefit) Regulations, 2014 (as amended up to date);

(Not Applicable as the company has not issued any securities under the regulations during the period under review).

(e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable as the company has not issued and listed any debt securities under the regulations during the period under review).**

(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; **(Not Applicable as the company is not registered as Registrar to issue and Share Transfer Agent during the period under review).**

(g) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009. **(Not Applicable as the company is still listed on BSE and not applied for delisting during the period under review.)**

(h) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; **(Not Applicable as the company has not bought back / proposed to buy-back any of its securities during the financial year under review.)**

(I) The company has complied with the requirements under the Equity Listing Agreements entered with the Bombay Stock Exchange Limited (BSE) and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; and

(j) The Memorandum and Articles of Association.

(v) OTHER APPLICABLE ACTS,

(a) Income Tax Act, 1961 and Indirect Tax Laws.

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

I) Secretarial Standards issued by the Institute of Company Secretaries of India.

ii) The Listing Agreements entered into by the Company with the Bombay Stock Exchange Limited.

During the period under review the Company has complied with the provisions of the Act, Rules, Regulations, Guidelines, Standards, Listing Agreements etc mentioned above.

I further report that:

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

The Company has obtained all necessary approvals under the various provisions of the Act; and there was no prosecution initiated and no fines or penalties were imposed during the year under review under the Act, SEBI Act, SCRA, Depositories Act, Listing Agreement and Rules and Regulations and Guidelines framed under these Acts against / on the Company, its Directors and Officers.

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:-

- As informed, the Company has responded appropriately to notices received from various statutory / regulatory authorities including initiating actions for corrective measures, wherever found necessary.

I further report that during the period, there were no instances of:

(I) Public / Rights / Preferential Issue of Shares / Debentures / Sweet Equity.

(ii) Redemption / buy-back of securities.

(iii) Merger / amalgamation /reconstruction etc.

Foreign technical collaboration.

Date: 25-06-2021
Place: New Delhi

FOR P.K. MISHRA & ASSOCIATES
COMPANY SECRETARIES

SD/-
PAWAN KUMAR MISHRA
PROPRIETOR
Membership No.FCS-4305
COP No.16222

UDIN: F004305C000513011

ANNEXURE - E

AUDIT COMMITTEE

The Audit Committee of the Company consists of Mrs. Sangita Jain, Chairman, Mr. Arjun Pahwa , Mr. Arun Khera as members. The Board of Directors of your Company has revised its terms of reference to make it in line with the requirements of Section 177 of the Companies Act, 2013 .

All the members of Audit Committee are independent directors except Mr. Arun Khera, who is Managing Director of the Company.

The terms of reference of the Audit Committee cover all areas mentioned under Clause 49(III) of the listing agreement with the stock exchanges and Section 177 of the Companies Act, 2013. The broad terms of reference of the Audit Committee, as on March 31, 2021, include, inter-alia, systematic review of accounting policies & practices, financial reporting process, adequacy of internal control systems and internal audit function, quarterly/half-yearly financial statements. It also recommends appointment of Statutory Auditors, Internal Auditors, Cost Auditors, Secretarial Auditors and fixation of their audit fees.

Representatives of Statutory Auditors attend the Audit Committee Meetings on invitation.

During the year April 01, 2020 to March 31, 2021, Audit Committee meetings have taken place on June, 23, 2020, September 2, 2020, November 12, 2020 ,& February 11, 2021

The attendance of each director at these meetings was as under:

S.No.	Name	No. of meeting during the year	No. of meeting attended
1	Arun Khera	4	4
2	Sangita Jain	4	4
3	Arjun Pahwa	4	4

TThe composition and terms of reference of the Audit Committee are inconformity with the Listing Agreement and the Companies Act, 2013.

The minutes of the meetings of the Audit Committee are placed before the Board for its information.

4. NOMINATION AND REMUNERATION COMMITTEE

The Board of Directors of your Company has renamed and reconstituted its existing ' Remuneration Committee' as 'Nomination and Remuneration Committee' and have also revised its terms of reference to make it in line with the requirements of Section 178 of the Companies Act, 2013 and clause 49 of the listing agreement. At present, the 'Nomination and Remuneration Committee' comprised of Mrs. Sangita Jain, as Chairman, Mr. Arjun Pahwa, Ms. Vimmi Sachdev, as members of the Committee.

Terms of Reference

The terms of reference of the Nomination and Remuneration Committee cover all areas mentioned under Clause 49(IV) of the listing agreement with the stock exchanges and Section 178 of the Companies Act, 2013.The broad terms of reference of the Nomination and Remuneration Committee inter-alia include recommending a policy relating to remuneration of directors and senior management personnel, formulation of criteria and identify persons who may be appointed as directors or senior management of the Company, Board diversity and any other matters which the Board of Directors may direct from time to time. During the year April 01, 2020 to March 31, 2021, One (1) 'Nomination and Remuneration Committee' meetings have taken place on February 11 2021.

The attendance of each director at these meetings was as under:

S.No.	Name	No. of meeting during the year	No. of meeting attended
1	Mrs. Sangita Jain	1	1
2	Mr. Arjun Pahwa	1	1
3	Mrs. Vimmi Sachdev	1	1

Remuneration Policy:-

The Remuneration Policy recommended by the Nomination and Remuneration Committee has been accepted by the Board of Directors. During the year under review, there was no pecuniary relationship or transactions of the non-executive directors vis-à-vis the Company. The Non-Executive Directors does not draw any remuneration from the company.

Remuneration paid to Sh. Arun Khera, managing Director for the F.Y. 2020-2021

(Amount in Rs.)

Salary	Nil
Company's Contribution to PF	Nil

Note: None of the non-executive directors has any pecuniary relationship or transaction vis-à-vis the Company.

Independent Directors Meeting

During the year under review, the Independent Directors met on 11.02.2021, inter alia to discuss :-

I. Review the performance of non-independent directors and the Board as a whole;

ii. Review the performance of the chairperson of the company, taking into account the views of executive directors and non-executive directors;

iii. Assess the quality, quantity and timeliness of flow of information between the company management and the Board that is necessary for the Board to effectively and reasonably perform their duties.

Annexure F

MANAGING DIRECTOR DECLARATION

I, Arun Khera , Managing Director of Smart Finsec Limited, certify based on annual disclosures received, that all Board members and senior Management personnel have abided by the Code of Conduct for Directors & Senior Management laid down by the Company.

For on behalf of the Board

Sd/-
Arun Khera
Managing Director
DIN :- 00055694

Place: New Delhi
Date: 03-09-2021

CERTIFICATE OF NON-DISQUALIFICATION OF DIRECTORS

(pursuant to Regulation 34(3) and Schedule V para C clause 10(i) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)

To,

The Members of
Smart Finsec Limited
FC-02, 4th Floor TDI Mall,
Vishal Enclave, Rajouri Garden,
New Delhi-110027

I have examined the relevant registers, records, forms, returns and disclosures received from the Directors of Smart Finsec Limited having CIN L74899DL1995PLC063562 and having registered office at FC-02, 4th Floor, TDI Mall, Vishal Enclave, Rajouri Garden, New Delhi-110027. (hereinafter referred to as 'the Company') 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 and its Officers, I hereby certify that none of the Directors on the Board od the Company as stated below for the Financial Year ending on 31st March, 2020 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	DIN	Date of appointment in Company
1	Arun Khera	00055694	02/05/1995
2	Raman Khera	00055728	02/05/1995
3	Vimmi Sachdev	01712051	01/08/2017
4	Sangita Jain	07045132	17/12/2014
5	Arjun Pahwa	07909675	01/08/2017

Ensuring the eligibility of for the appointment / continuity of every Director is the responsibility of the management of the Company. Our responsibility is to express an opinion on these based on my 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 pf the Company.

Place: New Delhi
Date: 06-09-2021

sd/-
Pawan Kumar Mishra
Company Secretaries in Practice
Membership No. FCS-4305
CP No.: 16222

UDIN number F004305C000903995

CERTIFICATE OF CHIEF FINANCIAL OFFICER

To,

The Board of Directors,
Smart Finsec Limited,

I, **Shashi Sharma**, Chief Financial Officer of **Smart Finsec Limited**, on the basis of the review of the financial statements and cash flow statement for the year ended 31st March 2021 and to the best of my knowledge and belief, hereby certify that:

These statements do not contain any materially untrue statements or omits any material fact or contain statements that might be misleading.

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.

There are, to the best of my knowledge and belief, no transactions entered into by the Company during the year ended 31st March 2021 which, are fraudulent, illegal or in violation of the Company's Code of Conduct.

I accept responsibility for establishing and maintaining internal controls for financial reporting and that I have evaluated the effectiveness of internal control systems of the company pertaining to financial reporting and we have disclosed to the Auditors' and the Audit Committee those deficiencies in the design or operations of such internal controls of which, I am aware and the steps taken and/ or proposed to be taken to rectify these deficiencies.

I have indicated to the Auditors and the Audit Committee:
There have been no significant changes in the internal control over financial reporting during this year.
There have been no significant changes in the accounting policies during the year.

To the best of our knowledge and belief, there is no instance of significant fraud of which I have become aware and the involvement therein, of management or an employee having significant role in the Company's internal control systems over financial reporting.

Sd/-
Shashi Sharma
Chief Financial Officer

Place: New Delhi
Dated: 03-09-2021

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Forward-Looking Statements

Forward-looking statements are based on certain assumptions and expectations of future events. The Company cannot guarantee that these assumptions and expectations are accurate or will be realized. The Company's actual results, performance or achievements could thus differ materially from those projected in any such forwardlooking statements. The Company assumes no responsibility to publicly amend, modify or revise any forward looking statements, on the basis of any subsequent developments, information or events.

Risks and Concerns

Financing industry has recently witnessed intense competition, falling lease rent and the entry of several big players. The Company continues to achieve cost efficiencies through the application of technology. However with the availability of financial resources, we are hopeful that the said Company will be able to take the opportunities of the expanding business opportunities. The Finance industry in which your Company is operating is subject to extensive regulation. The Company evaluates the technological obsolescence and the associated risk and makes investment according

Internal Control Systems and their adequacy

The Company has satisfactory internal control system.

Smart Finsec Ltd. has an adequate system of internal controls to ensure accuracy of accounting records, compliance with all laws & regulations and compliance with all rules, procedures & guidelines prescribed by the management. An extensive internal audit is carried out by independent firms of Chartered Accountants. Post audit reviews are also carried out to ensure follow up on the observations made.

1. Financial Performance with respect to Operational Performance Share Capital

The paid up equity share capital of the Company as on March 31, 2021 stands at Rs. 3,00,000,00 divided into 30,00,000 equity shares of Rs. 10/- each fully paid up and 4,80,00,000 divided 4,80,000 Non Convertible Cumulative redeemable Preference Shares of Rs. 100/- each .

2. Opportunities and Threats

Your Company being an Financing Company seeks opportunities in the Finance market. The business of company i.e. Smart Finsec Ltd. is affected by the sentiments prevailing in the Finance markets. Smart Finsec Ltd. is one of the reputed Financing houses. The Company is empanelled with most of the reputed domestic financial institutions including life and non-insurance companies, mutual funds, foreign financial institutions and corporate, the likely increase in capital mobilization from the primary market, increase in resource mobilization by mutual funds and phenomenal growth in secondary market volumes provide significant business opportunities for the Company. Capital market activities in which most of our activities depend on is also influenced by global events and hence there is an amount of uncertainty in the near term outlook of the market.

INDEPENDENT AUDITORS' REPORT

TO THE MEMBERS OF **SMART FINSEC LIMITED**

Report on the Audit of the Standalone Financial Statements

Opinion

We have audited the standalone financial statements of Smart Finsec Limited ("the Company"), which comprise the standalone balance sheet as at 31 March 2021, and the standalone statement of profit and loss (including other comprehensive income), standalone statement of changes in equity and standalone statement of cash flows for the year then ended, and notes to the standalone financial statements, including a summary of the significant accounting policies and other explanatory information (hereinafter referred to as "the Standalone Financial Statements").

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Companies Act, 2013 (the "Act") in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India, of the state of affairs of the Company as at 31 March 2021, and profit and other comprehensive income, changes in equity and its cash flows 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 Act. Our responsibilities under those Standards are further described in the Auditor's Responsibilities for the Audit of the Standalone Financial Statements section of our report. We are independent of the Company in accordance with the Code of Ethics issued by the Institute of Chartered Accountants of India together with the ethical requirements that are relevant to our audit of the Standalone Financial Statements under the provisions of the Act and the Rules thereunder, 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.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the Standalone Financial Statements of the current year. These matters were addressed in the context of our audit of the Standalone Financial Statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Other Information

The Company's Board of Directors is responsible for the preparation and presentation of its report (herein after called as "Board Report") which comprises various information required under section 134(3) of the Companies Act 2013 but does not include the financial statements and our auditor's report thereon.

Our opinion on the financial statements does not cover the Board Report and we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the Board Report and in doing so, consider whether the Board Report is materially inconsistent with the financial statements or our knowledge obtained during the course of our audit or otherwise appears to be materially misstated.

Management's Responsibility for the Financial Statements

The Company's Board of Directors is responsible for the matters stated in section 134(5) of the Act with respect to the preparation of these Financial Statements that give a true and fair view of the financial position,

financial performance, and cash flows of the Company in accordance with the AS and other accounting principles generally accepted in India. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the Company and for preventing and detecting frauds and other irregularities; selection and application of appropriate accounting policies; making judgments and estimates that are reasonable and prudent; and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the 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 responsible for overseeing the Company's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with SAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these Financial Statements.

As part of an audit in accordance with SAs, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

I) Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

ii) Obtain an understanding of internal financial controls relevant to the audit in order to design audit procedures that are appropriate in the circumstances. Under section 143(3)(i) of the Act, we are also responsible for expressing our opinion on whether the Company has adequate internal financial controls with reference to financial statements in place and the operating effectiveness of such controls

iii) Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management

iv) Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the Financial Statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern

v) Evaluate the overall presentation, structure and content of the Financial Statements, including the disclosures, and whether the Financial Statements represent the underlying transactions and events in a manner that achieves fair presentation

Materiality is the magnitude of misstatements in the Financial Statements that, individually or in aggregate, makes it probable that the economic decisions of a reasonably knowledgeable user of the Financial Statements may be influenced. We consider quantitative materiality and qualitative factors in (i) planning the scope of our audit work and in evaluating the results of our work; and (ii) to evaluate the effect of any identified misstatements in the Financial Statements.

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

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

II. Report on Other Legal and Regulatory Requirements

As required by Section 143(3) of the Act, based on our audit we report that:

A. We have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purposes of our audit

B. In our opinion, proper books of account as required by law have been kept by the Company so far as it appears from our examination of those books.

C. The Balance Sheet, the Statement of Profit and Loss and the Statement of Cash Flow dealt with by this Report are in agreement with the relevant books of account.

D. In our opinion, the aforesaid financial statements comply with the AS specified under Section 133 of the Act, read with Rule 7 of the Companies (Accounts) Rules, 2014

E. On the basis of the written representations received from the directors as on March 31, 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.

F. With respect to the adequacy of the internal financial controls with reference to financial statements of the Company and the operating effectiveness of such controls, refer to our separate Report in “Annexure A”. Our report expresses an unmodified opinion on the adequacy and operating effectiveness of the Company’s internal financial controls with reference to financial statements.

G. In our opinion, the managerial remuneration for the year ended March 31, 2021 has been paid / provided by the Company to its directors in accordance with the provisions of Section 197 read with Schedule V to the Act;

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

   i) The Company does not have any pending litigations which would impact its financial position.

   ii) The Company did not have any long-term contracts including derivatives contracts for which there were any material foreseeable losses.

   iii) There were no amounts which required to be transferred by the Company to the Investor Education and Protection Fund.

As required by the Companies (Auditor's Report) Order, 2016 ("the Order") issued by the Central Government in terms of Section 143(11) of the Act, we give in "Annexure B" a statement on the matters specified in paragraphs 3 and 4 of the Order.

For H.K. Dua & Co.
Chartered Accountants
ICAI Firm Registration Number: 000581N

CA Harsh Kumar Dua
Partner
Membership Number 080727
Place: New Delhi
Date: 25th June, 2021

ANNEXURE A TO THE AUDITOR'S REPORT OF EVEN DATE TO THE MEMBERS OF THE SMART FINSEC LIMITED ON THE INTERNAL FINANACIAL CONTROLS UNDER CLAUSE (i) OF SUB-SECTION 3 OF SECTION 143 OF THE COMPANIES ACT, 2013 ("THE ACT").

We have audited the internal financial controls with reference to financial statements of **SMART FINSEC LIMITED** ("the Company") as of 31 March 2021 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

Management's Responsibility for Internal Financial Controls

The Company‟s management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls over Financial Reporting issued by the Institute of Chartered Accountants of India („ICAI‟). These responsibilities include the design, implementation and maintenance of internal financial controls with reference to financial statements 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 Companies Act, 2013.

Auditor's Responsibility

Our responsibility is to express an opinion on the effectiveness of the Company's internal financial controls with reference to financial statements based on our audit. We conducted our audit in accordance with the Guidance Note on Audit of Internal Financial Controls over Financial Reporting (the "Guidance Note") and the Standards on Auditing, issued by ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, and, both issued by the Institute of Chartered Accountants of India. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether internal financial controls with reference to financial statements 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 assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company‟s internal financial controls with reference to financial statements.

Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that (1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorisations of management and directors of the company; and (3) provide reasonable assurance regarding prevention or timely detection of unauthorised acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

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

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31 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 Financial Controls Over Financial Reporting issued by the Institute of Chartered Accountants of India.

For H.K. Dua & Co.
Chartered Accountants
ICAI Firm Registration Number: 000581N

CA Harsh Kumar Dua
Partner
Membership Number 080727
Place: New Delhi
Date: 25th June, 2021
UDIN:

Annexure 'B' to the Independent Auditors' Report

The annexure referred to our Independent Auditors' Report to the members of Smart Finsec Limited on the standalone financial statements for the year ended 31.03.2021, we report that:

On the basis of such checks as we considered appropriate and in terms of information and explanations given to us, we state that:-

(I) In respect of its fixed assets:

(a) The Company has maintained proper records showing full particulars, including quantitative details and situation of the fixed assets.

(b) As explained to us, fixed assets have been physically verified by the management during the year in accordance with the phased programme of verification adopted by the management which, in our opinion, provides for physical verification of all the fixed assets at reasonable intervals. According to the information and explanations given to us, no material discrepancies were noticed on such verification.

(c) According to the information and explanations given to us and the records shown, the title deeds of immovable property owned by the company are in the name of company only.

(ii) In respect of its inventory:

a) As explained to us company is into the business of investing and trading in shares & Bonds and its inventory consist of Listed Shares. The inventory is verified electronically by the management during the year.

b) The procedures of electronic verification of inventories followed by the management are reasonable and adequate in relation to the size of the company and the nature of its business.

c) The company is maintaining proper records of Inventory. No discrepancies were noticed on such verification between the electronically maintained stocks and the book records.

(iii) The company has granted secured loans during the ordinary course of its business to a firm and to one other party covered in register maintained under section 189 of the Companies Act 2013.

(a) In respect of aforesaid loans, the terms and conditions under which such loans were granted are not prejudicial to the interest of the Company.

(b) According to the information and explanations given to us, the schedule of repayment of principal and payment of interest has been stipulated by the Company and the parties are regular in repayments.

(c) There are no overdue amounts in aforesaid loans.

(iv) In our opinion and according to the information and explanations given to us, the Company has complied with the provisions of section 185 and 186 of the Companies Act, 2013 in respect of loans and investments made.

(v) The company has not received any public deposits during the year and therefore this paragraph of the Order is not applicable.

(vi) The Cost records are not prescribed by the Central Government under sub section (1) of section 148 of the Companies Act 2013.

(vii) (a) According to the records, information and explanations provided to us, the Company is generally regular in depositing with appropriate authorities undisputed statutory dues including provident fund, employees' state insurance, income tax, sales tax, service tax, duty of customs, duty of excise, value added tax, cess, goods and service tax and other material statutory dues as applicable to it and no undisputed amounts payable were outstanding as at March 31st,

2021 for a period of more than six months from the date they became payable.

(d) According to the information and explanation given to us, there are no disputed dues outstanding in respect of income tax, sales-tax, service tax, duty of customs, duty of excise, goods and service tax and value added tax which have not been deposited with appropriate authorities.

(viii) In our opinion and according to the information and explanations given to us, there were no dues repayable to government, financial institutions, banks and debenture holders.

(ix) The Company did not raise any money by way of initial public offer or further public offer (including debt instruments) and term loans during the year. Accordingly, paragraph 3 (ix) of the Order is not applicable.

(x) According to the information and explanations given to us, no material fraud by the Company or on the Company by its officers or employees has been noticed or reported during the course of our audit.

(xi) According to the information and explanations give to us and based on our examination of the records of the Company, the Company has paid/provided for managerial remuneration in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Act.

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

(xiii) 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 statement as required by the applicable accounting standards.

(xiv) According to the information and explanations give to us and based on our examination of the records of the Company, the Company has not made any preferential allotment of Shares or debentures during the year.

(xv) 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. Accordingly, paragraph 3(xv) of the Order is not applicable.

(xvi) The company is required to be registered under section 45-IA of the Reserve Bank of India Act 1934 and is Registered vide Registration No. B-14.00691.

For H.K. Dua & Co.
Chartered Accountants
ICAI Firm Registration Number: 000581N

CA Harsh Kumar Dua
Partner
Membership Number 080727
Place: New Delhi
Date: 25th June, 2021
UDIN:

SMART FINSEC LIMITED

STATEMENT OF PROFIT & LOSS FOR THE YEAR ENDED 31st MARCH 2021

(Rs. In '000)

Particulars	Notes	Year ended 31.03.2021	Year ended 31.03.2020
Revenue from Operations			
i) Interest Income	14	5,184	7211
ii) Dividend Income		32	10
iii) Profit from F&O/ Jobbing	15	-87,438	20619
iv) Sale of Shares		309,640	66556
v) Rental Income		2,360	1800
vi) Net gain on fair value change	16	2,423	155
I Total Revenue From Operations		**232,200**	**96,351**
II Other Income		-	0
III Total Income		**232,200**	**96,351**
Expenses			
i) Finance Cost	17	966	1,157
i) Purchase of shares		2,61,931	1,16,792
ii) (Increase)/Decrease in closing stock	18	-37,972	-28,708
iii) Employee benefit expenses		920	941
iv) Demat Expense		3	121
v) Net Loss on fair value change			
vi) Depreciation	9	545	549.192
vii) Other Expenses	19	1,370	1,645
IV Total Expenses		**2,27,763**	**92,497**
V Profit before tax		4,437	3,854
VI. Tax Expense:			
Current Tax		-	488
Deferred Tax		-38	-38
VII Profit for the year (V-VI)			3,404
VIII Other Comprehensive Income		4,475	0
IX Total Comprehensive Income for the year		**4,475**	**3,404**
Earnings per Equity Share	24		
Basic (Rs.)		1.49	1.13
Diluted (Rs.)		1.49	1.13
Corporate information & Significant accounting policies	1 & 2		
The notes referred to above are an integral part of the financial statements	3-26		

Signed in terms of our report of even date

For H.K Dua & Co.
Chartered Accountants
Firm's Registration No.: 000581N

Sd/-
(Harsh Kumar Dua)
Partner
Membership No. : 080727
Place:New Delhi
Dated: 25th June 2021

For and on behalf of the Board of Directors

Sd/- **Sd/-**
(Arun Khera) **(Raman Khera)**
Managing Director **Director**
DIN:00055694 **DIN:00055728**

Sd/- **Sd/-**
(Priyanka Sharma) **(Shashi Sharma)**
Company Secretary **CFO**

The accompanying notes are an integral part of these financial statements

Particulars	For the year ended 31st March 2021	For the year ended 31st March 2020
Note-14: INTEREST INCOME		
Interest from Liquid Funds	23	1,425
Interest from Loans	2,167	3,217
Interest from Tax Free Bonds	2,993	2,569
	5,184	**7,211**
Note-15: PROFIT FROM F&O/JOBBING		
Profit in F&O	-87,109	20,221
Profit in Jobbing	-329	398
	-87,438	**20,619**
Note-16: NET GAIN ON FAIR VALUE CHANGE		
Gain on Fair Market Value of Tax Free Bonds	**2,423**	**155**
Note-17: FINANCE COST		
Dividend on Preferrence Shares	960	960
Dividend Distribution Tax	–	197
Finance Charges	6	–
	966	**1,157**
Note-18: (INCREASE)/ DECREASE IN CLOSING STOCK		
Opening Stock		
Less: Closing Stock	28,766	58
	66,738	28,766
	-37,972	**-28,708**
Note-19: OTHER EXPENSES		
SLB Fee	-1	495
Expenses related to purchase of shares	622	288
Software Charges	–	4
Advertisement	53	51
Bad Debts	–	50
Electricity Expenses	–	23
Compliance Charges	60	85
Listing Fee	354	354
Printing & Stationery	12	29
Professional Charges	100	100
Rent Paid	71	74
Telephone Expenses	4	6
Vehicle Maintenance	31	40
Website Expenses	4	4
Misc. Expenses	23	5
Audit Fee	30	30
Insurance	7	7
Provision against Standard Assets	–	–
	1,370	**1,645**

Note-20: Segment Reporting

On the basis of nature of activity carried out, The Company has identified two reportable primary segments, i.e. Real Estate segment and NBFC activity segment. The disclosure, as per Ind AS 108 for both the segments is as under:

	Real Estate		NBFC	
	2021	2020	2021	2020
Gross Revenue	2360	1800	229840	94551
Net Income	1815	1255	2622	2599

Particulars	For the year ended 31st March 2021	For the year ended 31st March 2020
Note-21: Value of Imports on CIF basis	NIL	NIL
Note-22: Expenditure in foreign currency	NIL	NIL
Note-23: Earning in foreign currency	NIL	NIL
Note-24: Earnings per share		
Earnings per share is calculated by dividing the profit attributable to equity shareholders by the weighted average number of equity shares outstanding during the year as under.		
Profit/(Loss) for the after taxes before Exceptional / Prior period items.	4,475	3,404
Basic and diluted Earning per Share	3,000	3,000
- Number of equity shares outstanding during the year	1.49	1.13
- Earning per share (`.)		
Note-25: RELATED PARTY DISCLOURES		
RELATED PARTY DISCLOSURES UNDER IND AS- 24		
A. Enterprises in which the Company has control	Smart Equity Brokers Pvt. Ltd.	Smart Equity Brokers Pvt. Ltd.
B. Parties in respect of which the company is a joint venture	NIL	NIL
C. Key Management Personnel		
1. Managing Director	Arun Khera	Arun Khera
2. Director	Raman Khera	Raman Khera
3. Director	Vimmi Sachdev	Vimmi Sachdev
4. Director	Sangita Jain	Sangita Jain
5. Director	Arjun Pahwa	Arjun Pahwa
Transactions with and outstanding balances of related parties during the year		
Brokerage paid to Smart Equity Brokers Pvt. Ltd.	72736	
Rent Paid to Arun Khera	70800	70800
Rental Income Earned- Arun Khera	1800000	1800000
Loan Taken from Arun Khera	42500000	NIL
Balance Outstanding in above loan as at the end of year	42500000	NIL
Note-26: LEASES		
As a Lessor: The Company has given two premises on operating leases. These lease arrangements are for a period of eleven months and are cancellable lease. The lease arrangements are renewable for further period on mutually agreeable terms and also include esclation clause.		
PARTICULARS	**As at 31.03.2021**	**As at 31.03.2020**
I) Properties & Fixtures		
Gross Carrying Amount	18400	18400
Depreciation for the year	545	545
Accumulated Depreciation	3318	2273
II) The total future minimum lease receivable at the Balance Sheet date are as under:		
Receivable		
With in one year	26,40,000	18,00,000
After one year but not more than three years	79,20,000	

SMART FINSEC LIMITED

NOTE-9: SCHEDULE OF PROPERTY, PLANT AND EQUIPMENT

The accompanying notes are an integral part of these financial statements

Sr. No	Particulars	Gross Block				Depreciaton				Net Block	
		Value at the beginning	Addition during the year	Deduction during the year	Value at the end	Value at the beginning	Addition during the year	Deduction during the year	Value at the end	WDV as on 31.03.2021	WDV as on 31.03.2020
	Tangible Assets										
1	Car	434,101	-	-	434,101	409,023	-	-	413,026	21,075	21,075
2	Furniture & Fixture	5,787,435	-	-	5,787,435	2,227,885	545,189	-	'"5.53: .485"	'"""4.68; .394"	3,014,361
3	Office Equipments	86,680	-	-	86,680	82,346	-	-	82,346	4,334	4,334
4	Property At Gurgaon	10,412,332	-	-	10,412,332	-	-	-	-	10,412,332	10,412,332
5	Property At Sainik Farms	2,200,000	-	-	2,200,000	-	-	-	-	2,200,000	2,200,000
6	Computer	47,000	-	-	47,000	44,650	-	-	44,650	2,350	2,350
	Total Figures for the Current Year	'"3: .; 89.76: "			'"3: .; 89.76: "	'"5.535.2; 8"	545,189	-	'"5.: 7: .4: 7"	'"37.32; .485"	15,654,452

Sr. No	Particulars	Gross Block				Depreciaton				Net Block	
		Value at the beginning	Addition during the year	Deduction during the year	Value at the end	Value at the beginning	Addition during the year	Deduction during the year	Value at the end	WDV as on 31.03.2020	WDV as on 31.03.2019
	Tangible Assets										
1	Car	'"""656.323 "	-	-	'"""656.323 "	'"""62; .245"	'"""6.225"	/	'"""635.248"	'"""43.297"	'"""47.29: "
2	Furniture & Fixture	'"""7.9: 9.657"	-	-	'"""7.9: 9.657"	'"4.449.: : 7 "	'"767.3: ; "	/	'"4.995.296 "	'"""5.236.583 "	'"""5.77; .772 "
3	Office Equipments	'"""""". 8.8: 2 "		-	'"""""". 8.8: 2 "	'"""". 4.568 "	'"""""/ ""	/	'"""". 4.568 "	'"""""6.556 "	'"""""6.556 "
4	Land & Building	'"32.634.554 "	-	-	'"32.634.554 "	'"""""""/ ""	'"""""/ ""	/	'"""""/ ""	'"32.634.554 "	'"32.634.554 "
5	Property At Sainik Farms	'"""4.422.222 "	-	-	'"""4.422.222 "	'"""""""/ ""	'"""""/ ""	/	'"""""/ ""	'"""4.422.222 "	'"""4.422.222 "
6	Computer	'"""""69.222 "	-	-	'"""""69.222 "	'"""66.872 "	'"""""/ ""	/	'"""66.872 "	'"""""4.572 "	'"""""4.572 "
	Vqvcn'Hki wtgu'hqt'vj g'Rtgxkqwu'[gct	**'"3: .; 89.76:**	-	-	**'"3: .; 89.76:**	**'"4.985.; 26"**	**'"76; .3; 4"**	**/**	**"5.535.2; 8"**	**'"37.876.674"**	**'"38.425.866"**

SMART FINSEC LIMITED
BALANCE SHEET AS AT 31st MARCH 2021

(Rs. In '000)

Particulars	Notes	As at 31.03.2021	As at 31.03.2020
ASSETS			
1. Financial Assets			
a) Cash and Cash Equivalents	2	1,230	7,363
b) Receivable Trade Receivable	3	15,482	11,794
c) Loans	4	19,559	11,742
d) Investments	5	45,398	42,975
e) Inventory- Shares & Securities	6	66,738	28,766
2. Non Financial Assets			
a) Current Tax Assets (Net)	7	945	855
b) Defered Tax Assets (Net)	8	192	154
c) Property Plant & Equipment	9	15,109	15,654
Total Assets		**1,64,653**	**1,19,303**
LIABILITIES AND EQUITY			
1. Financial Liabilities			
a) Payables			
I. Trade Payables			
(i) Total outstanding dues of micro enterprises and small enterprises			
(ii) Total outstanding dues of creditors other than micro and small enterprises		–	1,627
II. Other Payables			
(i) Total outstanding dues of micro enterprises and small enterprises			
(ii) Total outstanding dues of creditors other than micro and small enterprises	10	1,307	1,306
b) Subordinated Liabilities	11	48,000	48,000
c) Unsecured Loans from Directors		42,500	–
2. Non Financial Liabilities			
a) Current Tax Liabilities (Net)			
b) Provisions- on Standard Assets		107	107
3. Equity			
a) Equity Share Capital	12	30,000	30,000
b) Other Equity	13	42,739	38,263
Total Liabilities and Equity		**1,64,653**	**1,19,303**
Corporate information & Significant accounting policies The notes referred to above are an integral part of the financial statements	1 & 2 3-26		

Signed in terms of our report of even date

For H.K Dua & Co.
Chartered Accountants
Firm's Registration No.: 000581N

Sd/-
(Harsh Kumar Dua)
Partner
Membership No. : 080727
Place:New Delhi
Dated: 25th June, 2021

For and on behalf of the Board of Directors

Sd/-	**Sd/-**
(Arun Khera)	**(Raman Khera)**
Managing Director	**Director**
DIN:00055694	**DIN:00055728**
Sd/-	**Sd/-**
(Priyanka Sharma)	**(Shashi Sharma)**
Company Secretary	**CFO**

The accompanying notes are an integral part of these financial statements

Particulars	As at 31.03.2021	As at 31.03.2020
Note-2: CASH AND CASH EQUIVALENT		
Cash in hand	49	21
Cash at Banks	1,181	742
Liquid Funds	-	6,600
	1,230	**7,363**
Note-3: TRADE RECEIVABLES		
Considered Good- Unsecured- Less than six months old	15,482	11,794
	15,482	**11,794**
Note-4: LOANS		
At FVTPL	19,559	11,742
Unsecured and in India	19,559	11,742
Unsecured and Outside India		-
Note-5: INVESTMENTS		
At fair value through Profit or Loss		
Investments in Tax Free Bonds in India	45,398	42,975
Investments outside India	-	-
	45,398	**42,975**
Note-6: INVENTORIES		
Shares- Valued at lower of cost or market price	66,738	28,766
Note-7: CURRENT TAX ASSET		
Advance Tax/TDS/MAT (Net of Provision)	945	855
Note-8: DEFERRED TAX ASSET		
On account of timing difference	192	154
Note-10: OTHER PAYABLES		
Other than Micro and Small Enterprises		
Expenses Payable	347	149
Dividend Payable	960	960
Dividend Distribution Tax Payable	-	197
Others	-	-
	1307	**1,306**
Note-11: SUBORDINATED LIABILITIES		
At Amortised Cost		
4,80,000 2% Non Convertible Cumulative Redeemable Preference Shares (CRPS) of Rs. 100/- each, fully paid up	48,000	48,000

Terms/rights attached to CRPS:
The CRPS do not have voting rights other than in respect of matters directly affecting it. The payment of dividend is in accordance with the terms agreed at the time of issuance.

Note-12: EQUITY SHARE CAPITAL		
Subscribed and Paid up equity share capital	30,000	30,000
i) Authorised, Issued, Subscribed and Paid up		
Authorised		
Equity Shares of Rs. 10/- each.	32,000	32,000
2% Non Convertible Cumulative Redeemable Preference OF Rs.100	48,000	48,000
Issued Subscribed and Paid up		
Equity Shares of Rs.10/- each fully paid up	30,000	30,000

ii) Terms, rights attached to equity shares
The company has only one class of equity shares having a par value of Rs. 10/- per share. Members of the company holding equity share capital therein have a right to vote on every resolution placed before the company and the right to receive dividend. The voting rights on a poll is in proportion to the share of the paid up equity capital of the company held by the shareholders. In the event of liquidation of the company, the holders of equity shares would be entitled to receive remaining assets of the company after distribution of all preferential amounts.

The accompanying notes are an integral part of these financial statements

Particulars	As at 31.03.2021		As at 31.03.2020	
	No. of Shares	Rs. (in'000)	No. of Shares	Rs. (in'000)
iii) Reconciliation of the shares outstanding at the beginning and at the end of the year				
At the beginning of the year	30,00,000	30,000	30,00,000	30,000
Issued during the year	0	0	0	0
Outstanding at the end of the year	30,00,000	30,000	30,00,000	30,000

iv) Shares held by each shareholder holding more than 5% shares

Name of shareholder	% Shares	No. of Shares	% Shares	% Shares
Equity shares				
Arun Khera	12.57	377000	12.57	12.57
Raman Khera	13.13	393800	13.13	13.13
Sachit Khera	18.83	564754	18.83	18.83
Sunaina Khera	10.92	327602	10.92	10.92
Arun Khera(HUF)	12.42	372500	12.42	12.42

As per records of the Company, including its register of shareholders/members and other declarations received from shareholders regarding beneficial interest, the above shareholding represents both legal and beneficial ownerships of shares.

Note-13: OTHER EQUITY	**Statutory Reserve u/s. 45IC of RBI Act, 1934 (Rs. In'000)**	**Retained Earnings (Rs. In '000)**
Balance as on 31.03.2020	**7,636**	30,628
Transferred from statement of P&L	895	-
Net profit for the year		895
Excess tax provision of earlier years		4,475
		-
Balance as on 31.03.2021	**8,531**	**34,208**
Total		**42,739**

PARTICULARS OF DEPRECIATION ALLOWABLE AS PER THE INCOME TAX ACT, 1961

Description/ Block of Assets	W.D.V. as on 01.04.2019	Additions	Sales	Total	Depreciation	W.D.V. as on 31.03.2020
10% BLOCK						
Furniture & Fixture	3,800,764.00	–	–	3,800,764.00	3,800,76.00	3,420,688.00
15% BLOCK						
Cell Phone	334.90	–	–	334.90	50.00	
Invertor	301.45	–	–	301.45	45.00	284.90
Electric Generator	352.80	–	–	352.80	53.00	256.45
Car	250,338.00	–	–	250,338.00	37,551.00	299.80
						212,787.00
60% BLOCK						
Computer	1,203.00	–	–	1,203.00	722.00	481.00
TOTAL	**4,053,294.15**	**–**	**–**	**4,053,294.15**	**418,497.00**	**3,634,797.15**

SMART FINSEC LIMITED

CASH FLOW STATEMENT FOR THE YEAR ENDED ON 31st MARCH 2021

	Particulars	For the year ended 31st March 2021	For the year ended 31st March 2020
A	**CASH FLOW FROM OPERATING ACTIVITIES:**		
	Net profit / (loss) before taxes	4,437	3,854
	Adjustment to reconcile profit before tax to Net Cash Flows:		
	Add non cash expenses	545	
	Depreciation		549
	Less: income considered separately		
	Dividend earned	-32	-10
	Net(Gain)/loss on fair value changes	-2,423	-155
	Profit/loss on sale of assets		
	Operating profit before working capital changes	2,527	4,238
	Change in Assets & Liabilities		
	(increase)/decrease in trade receivable	-3,688	-11794
	(increase)/decrease in Loans and Other Assets	-7,817	-11742
	(increase)/decrease in liabilities and provisions	-1,626	-8,152
	(increase)/decrease in non financial assets	-90	-654
	(increase)/decrease in inventory	-37,972	-28,766
	Cash generated from Operations	**-48,666**	**-56,870**
B.	**CASH FLOW FROM INVESTING ACTIVITIES:**		
	Purchase of Fixed Assets		
	Sale of Fixed Assets	0	0
	Dividend earned	32	10
	Purchase of Investments		
	Sale of Investments	0	0
	Net Cash used in Investing Activities	**32**	**10**
C.	**CASH FLOW FROM FINANCING ACTIVITIES:**		
	Unsecured loan	42,500	-
	Share Capital	-	-
	Net Cash Flow from Financing Activities	**42,500**	-
	Net Increase in cash and cash equivalents (A) + (B) + (C)	-6,134	(56,800)
	Cash and cash equivalents - Opening	7,363	0
	Cash and cash equivalents - Closing	1,230	7,363

Signed in terms of our report of even date

For H.K Dua & Co.
Chartered Accountants
Firm's Registration No.: 000581N

Sd/-
(Harsh Kumar Dua)
Partner
Membership No. : 080727
Place:New Delhi
Dated: 25th June, 2021

For and on behalf of the Board of Directors

Sd/-
(Arun Khera)
Managing Director
DIN:00055694

Sd/-
(Raman Khera)
Director
DIN:00055728

Sd/-
(Priyanka Sharma)
Company Secretary

Sd/-
(Shashi Sharma)
CFO

SMART FINSEC LIMITED

STATEMENT OF CHANGES IN EQUITY FOR THE YEAR ENDED 31.03.2021

EQUITY SHARE CAPITAL

(Rs. In '000)

Particulars	Notes	Year ended 31.03.2021	Year ended 31.03.2020
Balance at the beginning of the year		30,000	30,000
Changes in Equity Share Capital during the year		–	–
Balance at the end of the year		**30,000**	**30,000**

OTHER EQUITY	13	Statutory Reserve u/s.	Retained	Other
For the year ended 31.03.2021		45IC of RBI Act, 1934	Earnings	Comprehensive Income
Balance as at 31 March 2020		7,636	30,628	–
Profit after tax		–	4,475	–
Transfer to Reserve Fund in terms of section 45-IC(1) of the Reserve Bank of India Act, 1934		895	-895	–
Balance as at 31 March 2021		**8,531**	**34,208**	**–**
For the year ended 31.03.2020		6,721	27,767	–
Balance as at 31 March 2019		-	3,404	–
Profit after tax		915	-915	–
Transfer to Reserve Fund in terms of section 45-IC(1) of the Reserve Bank of India Act, 1934		-	372	–
Excess Provision of earlier years				
Balance as at 31 March 2020		**7,636**	**30,628**	**–**

Signed in terms of our report of even date

For H.K Dua & Co.
Chartered Accountants
Firm's Registration No.: 000581N

Sd/-
(Harsh Kumar Dua)
Partner
Membership No. : 080727
Place:New Delhi
Dated: 25th June, 2021

For and on behalf of the Board of Directors

Sd/-
(Arun Khera)
Managing Director
DIN:00055694

Sd/-
(Raman Khera)
Director
DIN:00055728

Sd/-
(Priyanka Sharma)
Company Secretary

Sd/-
(Shashi Sharma)
CFO

SMART FINSEC LIMITED

Registered Office: FC-02, 4th Floor TDI Mall,
Vishal Enclave, Rajouri Garden,
New Delhi-110027

CIN:- L74899DL1995PLC063562

Phone:- 011-25167071

Email Id:- smartfinsec@gmail.com

Form 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)

26th Annual General Meeting – September 30th, 2021

Name of Member(s)	
Registered Address	
Email Id	
Folio No.	
DP ID.	
Client ID	

I/ We, being the member(s) of Smart Finsec Limited holding…….. shares hereby appoint:

1.	Name			
	Address			
	E – Mail id			
	Or failing him			
			Signature	
2	Name			
	Address			
	E – Mail id			
	Or failing him			
			Signature	
3	Name			
	Address			
	E – Mail id			
	Or failing him			
			Signature	
4	Name			
	Address			
	E – Mail id			
	Or failing him			
			Signature	

As my/ our proxy to attend and vote (on poll) for me/ us and on my/ our behalf at the 26th Annual General Meeting of the company to be held on September 30th , 2021 at 10:00 AM, at FC-02, 4TH FLOOR,TDI MALL, VISHAL ENCLAVE, RAJOURI GARDEN, NEW DELHI-1100027.

and at any adjournment thereof in respect of such resolutions as are indicated below:

Resolution No.	Resolutions	Optional	
	Ordinary Resolution	For	Against
1	Adoption of Audited Balance Sheet as at March 31, 2021, the Profit and Loss Account for the year ended on that date with the reports of the Board of Directors and Auditors thereon.		
2	Mrs. Raman Khera (DIN:00055728) Director, who retires by rotation and being eligible for re-appointment, be and is hereby re-appointed as a Director of the Company ".		

Signed this…….. day of……2021

Affix Revenue Stamp not less than Rs. 0.15

…… ……

Signature of Member Signature of Proxy Holder(s)

Note.:

1. This form of Proxy in order to be effective should be duly completed and deposited at the Registered Office of the Company, not less than 48 hours before the commencement of the Meeting.
2. For Resolutions and Notes, please refer to the Notice of 26th Annual General Meeting of the Company.
3. It is Optional to put 'X' in the appropriate column against the Resolutions indicated in the Box. If you leave the, 'For' or 'Against' column blank against any or all Resolutions, your Proxy will be entitled to vote in the manner as he/she thinks appropriate.
4. Please complete all details including details of Member(s) in above box before submision.

SMART FINSEC LIMITED

Registered Office: FC-02, 4th Floor TDI Mall,
Vishal Enclave, Rajouri Garden,
New Delhi-110027

CIN:- L74899DL1995PLC063562

Phone:- 011-25167071

Email Id:- smartfinsec@gmail.com

ATTENDENCE SLIP

(To be surrendered at the time of entry to the venue)

26th Annual General Meeting on Thursday, September 30th, 2021, at 10:00 AM at FC-02, 4TH FLOOR, TDI MALL, VISHAL ENCLAVE, RAJOURI GARDEN, NEW DELHI-1100027.

Name	
Address	
DP ID	
Client ID	
Regd. Folio No.	
No. of Shares held	

I certify that I am a member / proxy for the member(s) of the Company

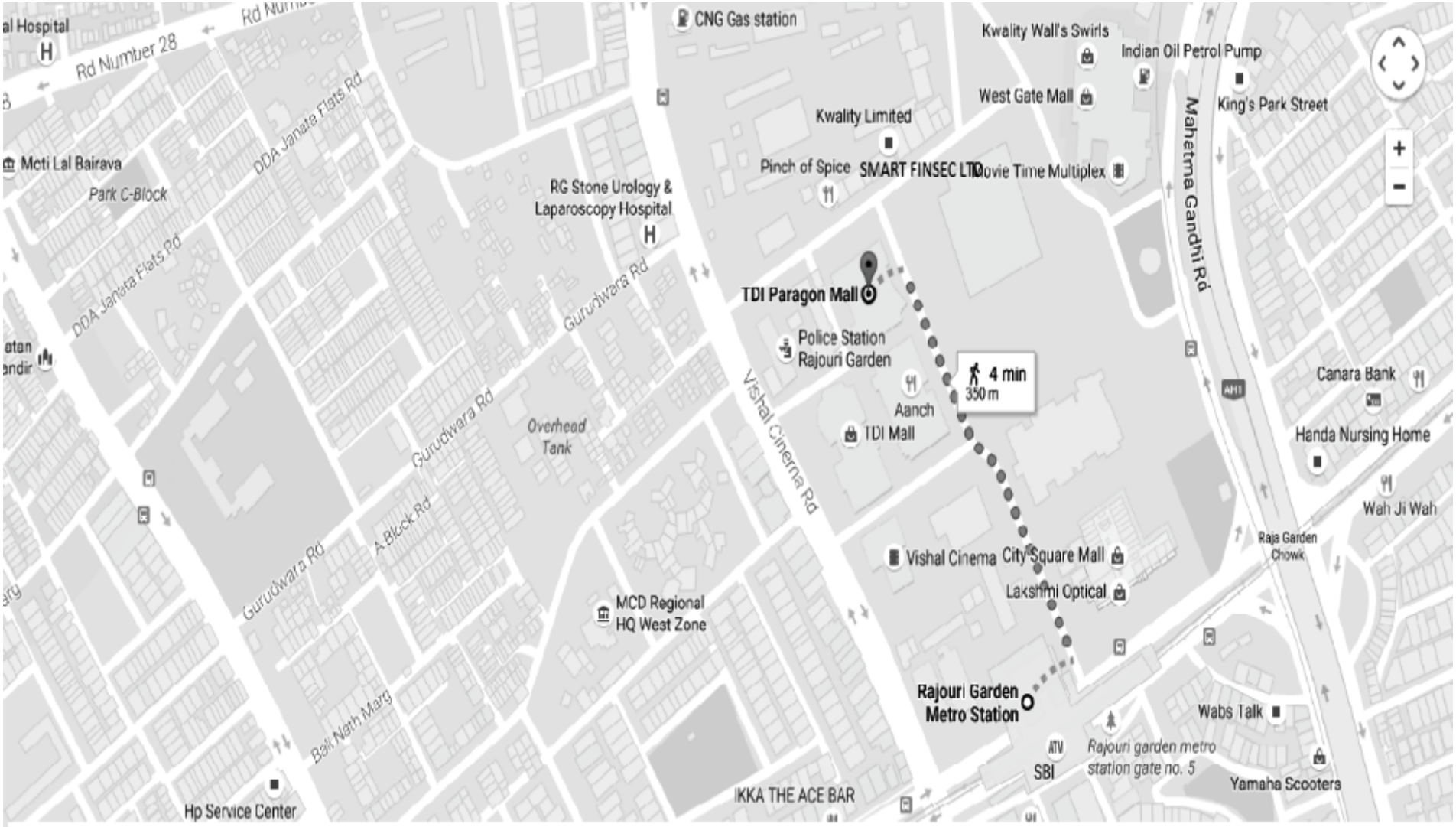
I hereby record my presence at the 26th Annual General Meeting of the company to be held on, September 30th, 2021, at 10:00 AM, at FC-02, 4TH FLOOR,TDI MALL, VISHAL ENCLAVE, RAJOURI GARDEN, NEW DELHI-1100027

…… ……

Member's/Proxy's name in block letters Signature of Member / Proxy

Note.: 1. Only Member/ Proxy holder can attend the meeting.

2. Members are requested to bring their copies of the Annual Report to the meeting.


CNG Gas station
Kwality Wall's Swirls
Indian Oil Petrol Pump
West Gate Mall
King's Park Street
Kwality Limited
Pinch of Spice
SMART FINSEC LTD
Movie Time Multiplex
Mahatma Gandhi Rd
RG Stone Urology & Laparoscopy Hospital
TDI Paragon Mall
Police Station Rajouri Garden
4 min
350 m
Aanch
TDI Mall
Canara Bank
Handa Nursing Home
Wah Ji Wah
Raja Garden Chowk
Vishal Cinema City Square Mall
Lakshmi Optical
Vishal Cinema Rd
Overhead Tank
Gurudwara Rd
A Block Rd
Bal Nath Marg
MCD Regional HQ West Zone
Rajouri Garden Metro Station
Wabs Talk
SBI
Rajouri garden metro station gate no. 5
Yamaha Scooters
IKKA THE ACE BAR
Hp Service Center
Moti Lal Bairava
Park C-Block
DDA Janata Flats Rd
Rd Number 28