SWAGTAM TRADING & SERVICES LIMITED

Regd. Office: R-489, GF-A, New Rajinder Nagar, New Delhi – 110060 Tel: 011-42475489 E-mail: <u>swagtam1984@gmail.com</u> Website: <u>www.swagtam.com</u> CIN: L51909DL1984PLC289131

Date: 19.04.2024

To, Bombay Stock Exchange Ltd. P. J. Tower, Dalal Street, Mumbai – 400 001 Maharashtra, India

To, Calcutta Stock Exchange Ltd. 7, Lyons Range, Kolkata – 700 001

Ref: Disclosure / Compliance as per Reg. 23(9) of SEBI (LODR) Regulation, 2015

Dear Sir / Madam,

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We humbly submit that, as per the Understanding given to us, provisions of Reg. 15(2) & Reg. 23(9) are not applicable to the Company in view of the following :

> As per <u>Regulation 15(2)</u> of the SEBI (LODR) Regulations, 2015 it has been stipulated that the compliance with the corporate governance provisions as specified in Regulations 17, 17A, 18, 19, 20, 21,22, **23**, 24, 24A, 25, 26, 27 and Clauses (b) to (i) and (t) of Sub – Regulation (2) of <u>Regulation 46</u> and Para C, D and E of Schedule V shall <u>NOT</u> be Applicable in respect of:

Wsted entity having paid – up equity share capital not exceeding Rs. ten crore and net worth not exceeding Rs. twenty five crore, as on the last day of the previous financial year.

As per <u>Regulation 23 (9)</u> of the SEBI (LODR) Regulations, 2015

the listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, and publish the same on its website:

provided that a 'high value debt listed entity' shall submit such disclosures along with its standalone financial results for the half year.

However, as per the Communication from your Office, we have been advised & have now preferred to make the said Compliance/ Disclosure as a measure of abundant caution & precaution, without Admitting any lapse, guilt, non- compliance, etc., on our part.

Accordingly, please find enclosed herewith Disclosure of 'Related Party Transactions' for the half year ended September 30, 2023.

Kindly consider and take this Disclosure on your records.

Thanking You, For SWAGTAM TRADING & SERVICES LIMITED F or SWAGTAM TRADING & SUMIT GUPTA Director/Auth. Sign Director DIN: 06911742 Place : New Delhi

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Disclosure / Compliance as per Reg. 23(9) of SEBI (LODR) Regulation, 2015 Period : 01.04.2023 to 30.09.2023 V

| Name of Managerial Person Nature of Relationship Deposits Loans/ Advances Name of Managerial Person Nature of Relationship Exponent of Contract of Con | | | Anril 2023 | Anril 2023 - Sentember 2023 | | | | | |
|--|---------------------------|------------------------|--------------|-----------------------------|-------|----------|-----------|-------------|--------|
| Tail PersonDepositsLoans/ Advarial PersonNature of RelationshipDepositsLoans/ Adv $MuthodologicRemunerationGivenTakenSharesOutstandingWTD \& CFO1,25,000.001,25,000.00PorchasedBalanceBalanceWTD \& CFO1,25,000.001,25,000.00PorchasedBalanceBalanceWTD \& CFO1,50,000.001,50,000.00PorchasedPorchasedBalanceWTD \& CFO1,50,000.00PorchasedPorchasedPorchasedPorchasedWTD \& CFO1,50,000.00PorchasedPorchasedPorchasedPorchasedWTD \& CFO1,50,000.001,50,000.00PorchasedPorchasedPorchasedWTL deRent60,000.005,00,000.00PorchasedPorchasedPorchasedWTL deRent3,35,000.005,00,000.00PorchasedPorchasedPorchased$ | | | | | | | | | |
| erial PersonNature of RelationshipGoods/ RemunerationSharesOutstandingRemunerationRemunerationGivenTakenServicesPurchasedBalanceWTD & CFO1,25,000.001,25,000.00PurchasedBalanceBalancePurchasedBalanceWTD & CFO1,25,000.001,25,000.00PurchasedPurchasedBalancePurchasedPurchasedPurchasedWTD & CFO1,25,000.00PurchasedPurchasedPurchasedPurchasedPurchasedPurchasedWTD & CFO1,50,000.00PurchasedPurchasedPurchasedPurchasedPurchasedPurchasedWTD & CFO1,50,000.005,00,000.00PurchasedPurchasedPurchasedPurchasedPurchasedVt LtdRent60,000.005,00,000.00PurchasedPurchasedPurchasedPurchasedPurchasedVt LtdRent3,35,000.005,00,000.00PurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedPurchasedVt LtdRent3,35,000.005,00,000.00Purchased | | | | Deposits | | | | Loans/ Adv | ances |
| Remuneration Given Taken Bervices Purchased Balance WTD & CFO 1,25,000.00 1,25,000.00 1,25,000.00 1 1 1 WTD & CFO 1,25,000.00 1,25,000.00 1 1 1 1 1 WTD & CFO 1,25,000.00 1,50,000.00 1 1 1 1 1 WTD & CFO 1,50,000.00 1,50,000.00 1 1 1 1 1 Vt Ltd Rent 60,000.00 5,00,000.00 1 | Name of Managerial Person | Nature of Relationship | | | | Goods/ | Shares | Outstanding | |
| WTD & CFO 1,25,000.00 WTD & CFO - WTD & CFO - WTD & CFO - Co. Secretary 1,50,000.00 vt Ltd Rent Rent 60,000.00 A335,000.00 | | | Remuneration | Given | Taken | Services | Purchased | Balance | Status |
| WTD & CFO - WTD & CFO - WTD & CFO - Co. Secretary 1,50,000.00 vt Ltd Rent Rent 60,000.00 Association - 3,35,000.00 - | Lalita Mittal | WTD & CFO | 1,25,000.00 | | | | | | |
| WTD & CFO - - Co. Secretary 1,50,000.00 - vt Ltd Rent 60,000.00 - Rent 3,35,000.00 - - | Prabhjot Kaur | WTD & CFO | | | | | | | |
| Co. Secretary 1,50,000.00 vt Ltd Rent 60,000.00 Rent 3,35,000.00 - | Vinod Bala | WTD & CFO | | | | | | | |
| vt Ltd Rent 60,000.00 | Pooja Mathur | Co. Secretary | 1,50,000.00 | | | | | | |
| Rent - 3,35,000.00 | Best Properties Pvt Ltd | Rent | 60,000.00 | | | | | | |
| 3,35,000.00 | Rajendra Ghagre | Rent | | | | | | | |
| | Total | | 3,35,000.00 | 5,00,000.00 | | | | × | |

Kindly consider and take this Disclosure on your records.

