

General information about company	
Scrip code	530585
NSE Symbol	NOTLISTED
MSEI Symbol	NOTLISTED
ISIN	INE691C01022
Name of the entity	SWASTIKA INVESTMART LIMITED
Date of start of financial year	01-04-2024
Date of end of financial year	31-03-2025
Reporting Quarter Type	Yearly
Date of Quarter Ending	31-03-2025
Type of company	Equity
Whether Annexure I (Part A) of the SEBI Circular dated December 31, 2024 related to Compliance Report on Corporate Governance is applicable to the entity?	Yes
Whether Annexure I (Part B) of the SEBI Circular dated December 31, 2024 related to Investor Grievance Redressal Report is Applicable to the entity?	Yes
Whether Annexure I (Part C) of the SEBI Circular dated December 31, 2024 related to Disclosure of Acquisition of Shares or Voting Rights in Unlisted Companies is Applicable to the entity?	No
Whether Annexure I (Part D) of the SEBI Circular dated December 31, 2024 related to Disclosure of Imposition of Fine or Penalty is Applicable to the entity?	Yes
Whether Annexure I (Part E) of the SEBI Circular dated December 31, 2024 related to Disclosure of Updates to Ongoing Tax Litigations or Disputes is Applicable to the entity?	Yes
Whether Annexure I (Part F) of the SEBI Circular dated December 31, 2024 related to Disclosure Of Loans / Guarantees / Comfort Letters / Securities Etc. is Applicable to the entity?	Yes
Risk management committee	Not Applicable
Market Capitalisation as per immediate previous Financial Year	Any other
Is SCORE ID Available ?	Yes
SCORE Registration ID	S00705
Reason For No SCORE ID	
Type of Submission	Original
Remarks (website dissemination)	<input type="button" value="Add Notes"/>
Remarks for Exchange (not for Website Dissemination)	<input type="button" value="Add Notes"/>

Annexure 1		For this quarter kindly note the following points:
II. Composition of Committees		1. Date of Appointment and Date of Cessation (if applicable) must be mandatorily filed for every Committee.
Disclosure of notes on composition of committees explanatory		2. Date of Appointment can be any day upto September 30, 2022.
Is there any change in information of committees compare to previous quarter		3. Date of Cessation must be for the current quarter only, i.e. July 1, 2022 to September 30, 2022.

Note: Please enter DIN. After entering DIN, Name of Committee members and Category 1 of Directors shall be prefilled automatically

Audit Committee Details						
Whether the Audit Committee has a Regular Chairperson					Yes	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation
1	00209498	CHANDRASHEKHAR BOBRA	Non-Executive - Independent Director	Chairperson	01-08-2017	
2	02212645	TARUN KUMAR BALDUA	Non-Executive - Independent Director	Member	01-04-2024	
3	05124184	GYAN CHAND JAIN	Non-Executive - Independent Director	Member	20-07-2024	
4	08058452	ANSHUL AGRAWAL	Non-Executive - Independent Director	Member	20-07-2024	

Nomination and remuneration committee						
Whether the Nomination and remuneration committee has a Regular Chairperson					Yes	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation
1	00209498	CHANDRASHEKHAR BOBRA	Non-Executive - Independent Director	Chairperson	01-08-2017	
2	02212645	TARUN KUMAR BALDUA	Non-Executive - Independent Director	Member	01-04-2024	
3	05124184	GYAN CHAND JAIN	Non-Executive - Independent Director	Member	20-07-2024	

Stakeholders Relationship Committee						
Whether the Stakeholders Relationship Committee has a Regular Chairperson					Yes	
Sr	DIN Number	Name of Committee members	Category 1 of directors	Category 2 of directors	Date of Appointment	Date of Cessation
1	00209498	CHANDRASHEKHAR BOBRA	Non-Executive - Independent Director	Chairperson	01-08-2017	
2	02212645	TARUN KUMAR BALDUA	Non-Executive - Independent Director	Member	01-04-2024	
3	00015963	SUNIL NYATI	Executive Director	Member	20-07-2024	

Annexure 1							
III. Meeting of Board of Directors							
Disclosure of notes on meeting of board of directors explanatory				Add Notes			
Sr. No.	Date(s) of meeting (Enter dates of Previous quarter and Current quarter in chronological order)	Maximum gap between any two consecutive (in number of days)	Notes for not providing Date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors as on date of the meeting	Number of Directors present* (All directors including Independent Director)	No. of Independent Directors attending the meeting*
Add		Delete					
1	22-10-2024			Yes	7	6	3
2	20-01-2025	89		Yes	7	7	4

Annexure 1										
IV. Meeting of Committees										
Disclosure of notes on meeting of committees explanatory							Add Notes			
Sr	Name of Committee	Date(s) of meeting (Enter dates of Previous quarter and Current	Maximum gap between any two consecutive (in number of days)	Name of other committee	Reason for not providing date	Whether requirement of Quorum met (Yes/No)	Total Number of Directors in the Committee as on date	Number of Directors Present (All Directors)	No. of Independent Directors attending the	No. of members attending the meeting (other
Add		Delete								
1	Audit Committee	22-10-2024				Yes	4	3	3	0
2	Audit Committee	20-01-2025	89			Yes	4	4	4	0
3	Nomination and remuneration committee	20-01-2025				Yes	3	3	3	0
4	Stakeholders Relationship Committee	20-01-2025				Yes	3	3	2	0

Annexure 1		
V. Affirmations		
Sr	Subject	Compliance status (Yes/No)
1	The composition of Board of Directors is in terms of SEBI (Listing obligations and disclosure requirements) Regulations, 2015	Yes
2	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015 a. Audit Committee	Yes
3	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015.	Yes
4	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015.	Yes
5	The composition of the following committees is in terms of SEBI(Listing obligations and disclosure requirements) Regulations, 2015. d. Risk management committee (applicable to	NA
6	The committee members have been made aware of their powers, role and responsibilities as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
7	The meetings of the board of directors and the above committees have been conducted in the manner as specified in SEBI (Listing obligations and disclosure requirements) Regulations, 2015.	Yes
8	This report and/or the report submitted in the previous quarter has been placed before Board of Directors.	Yes
9	Any comments/observations/advice of Board of Directors may be mentioned here:	Add Notes

Details of Cyber security incidence		
Whether as per Regulation 27(2)(ba) of SEBI (LODR) Regulations, 2015 there has been cyber security incidents or breaches or loss of data or documents during the quarter		No
Other details of cyber security incidence or breaches or loss of data event		Add Notes
Number of cyber security incidence or breaches or loss of data event occurred during the quarter		
Sr.	Date of the event	Brief details of the event

Annexure II			
Annexure II to be submitted by listed entity at the end of the financial year (for the whole of financial year)			
I. Disclosure on website in terms of LODR Regulation			
Sr	Item	Compliance status (Yes/No/NA)	Web address
As per regulation 46(2) of the LODR:			
1.1	Details of business	Yes	https://www.swastika.co.in/
1.2	Memorandum of Association and Articles of Association	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/676e551e2450720062f2d317_MoA%20AoA%20Swastika%20Investmart_05.09.2024.pdf
1.3	Brief profile of board of directors including directorship and full-time positions in body corporates	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/676e5683f0b521ee3bb9fcf1_Brief%20Profile%20of%20Directors%20f%20Swastika%20Investmart%20Limited.pdf
2	Terms and conditions of appointment of independent directors	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/661ec231b40a50358d24b896_Terms%20and%20conditions%20of%20Appointment%20of%20Independent%20Directors.pdf
3	Composition of various committees of board of directors	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/66dedccc5c8a6963d2146e5_Composition%20of%20Committee_Updated.pdf
4	Code of conduct of board of directors and senior management personnel	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/680b76122d5eda1307e2e6dc_CODE%20OF%20CONDUCT%20FOR%20BOARD%20MEMBERS%20AND%20SENIOR%20MANAGEMENT.pdf
5	Details of establishment of vigil mechanism/ Whistle Blower policy	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/6620e525cf6246ae39f0fda0_Vigil%20Mechanism.pdf
6	Criteria of making payments to non-executive directors	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/64ba674653b69a5111c552cf_Criteria%20for%20Making%20Payment%20to%20Non-Executive%20Directors.pdf
7	Policy on dealing with related party transactions	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/6802049133e3aecbeae89de7_related%20party%20policy_Swastika_20.01.2025.pdf
8	Policy for determining 'material' subsidiaries	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/6805dba488485746851dd3c5_Policy%20for%20determining%20Material%20Subsidiary_Swastika%2020.01.2025.pdf
9	Details of familiarization programmes imparted to independent directors	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/6805d6bbbba08b1c17666d55_Familiarization%20Programme%20for%20Independent%20Directors%202024-25.pdf
10	Email address for grievance redressal and other relevant details	Yes	https://www.swastika.co.in/investor-relation/otheruserfulinfo
11	Contact information of the designated officials of the listed entity who are responsible for assisting and handling investor grievances	Yes	https://www.swastika.co.in/investor-relation/otheruserfulinfo
12	Financial results	Yes	https://www.swastika.co.in/investor-relation/financialresults
13	Shareholding pattern	Yes	https://www.swastika.co.in/investor-relation/shareholdingpatterns
14	Details of agreements entered into with the media companies and/or their associates	NA	
15.1	(I) Schedule of analyst or institutional investor meet (II) Presentations prepared by the listed entity for analysts or institutional investors meet, post earnings or quarterly calls prior to beginning of such events.	Yes	https://www.swastika.co.in/investor-relation/investor-meet-and-presentation
15.2	Audio recordings, video recordings, if any, and transcripts of post earnings or quarterly calls, by whatever name called, conducted physically or through digital means	Yes	https://www.swastika.co.in/investor-relation/investor-meet-and-presentation
16	New name and the old name of the listed entity	NA	
17	Advertisements as per regulation 47 (1)	Yes	https://www.swastika.co.in/investor-relation/newspaperpublications
18	Credit rating or revision in credit rating obtained	NA	
19	Separate audited financial statements of each subsidiary of the listed entity in respect of a relevant financial year	Yes	https://www.swastika.co.in/investor-relation/subsidiariesfinancial
20	Secretarial Compliance Report	Yes	https://www.swastika.co.in/investor-relation/secretarialcompliancereport
21	Materiality Policy as per Regulation 30 (4)	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/6805d926022defe912396f1d_Policy%20for%20determination%20of%20materiality%20of%20events%20or%20information_20.01.2025.pdf
22	Disclosure of contact details of KMP who are authorized for the purpose of determining materiality as required under regulation 30(5)	Yes	https://cdn.prod.website-files.com/64b51ae831e2d786aa8442e5/64ba14d4ce3bcf6f0a65da2_Authority%20for%20determining%20the%20materiality%20of%20event%20or%20information.pdf
23	Disclosures under regulation 30(8)	Yes	https://www.swastika.co.in/investor-relation/reportsandfilings
24	Statements of deviation(s) or variations(s) as specified in regulation 32	Yes	https://www.swastika.co.in/investor-relation/reportsandfilings
25	Dividend Distribution policy as per Regulation 43A(1)	NA	
26.1	Annual return as provided under section 92 of the Companies Act, 2013	Yes	https://www.swastika.co.in/investor-relation/annual-reports
26.2	Employee Benefit scheme documents framed in terms of SEBI (SBEB) Regulations, 2021	NA	
27	Confirmation that the above disclosures are in a separate section as specified in regulation 46(2)	Yes	https://www.swastika.co.in/disclosure-under-regulation-46-of-sebi-lodr-regulations
28	Compliance with regulation 46(3) with respect to accuracy of disclosures on the website and timely updating	Yes	https://www.swastika.co.in/disclosure-under-regulation-46-of-sebi-lodr-regulations
29	Disclosure of notes on website in terms of Listing Regulations explanatory [Text Block]		

Annexure II			
II. Annual Affirmations			
Sr	Particulars	Regulation Number	Compliance status (Yes/No/NA)
1	Independent director(s) have been appointed in terms of specified criteria of 'independence' and/or 'eligibility'	16(1)(b)	Yes
2	Board composition	17(1), 17(1A) & 17(1C), 17(1D) & 17(1E)	Yes
3	Meeting of Board of directors	17(2)	Yes
4	Quorum of Board meeting	17(2A)	Yes
5	Review of Compliance Reports	17(3)	Yes
6	Plans for orderly succession for appointments	17(4)	Yes
7	Code of Conduct	17(5)	Yes
8	Fees/compensation	17(6)	Yes
9	Minimum Information	17(7)	Yes
10	Compliance Certificate	17(8)	Yes
11	Risk Assessment & Management	17(9)	Yes
12	Performance Evaluation of Independent Directors	17(10)	Yes
13	Recommendation of Board	17(11)	Yes
14	Maximum number of Directorships	17A	Yes
15	Composition of Audit Committee	18(1)	Yes
16	Meeting of Audit Committee	18(2)	Yes
17	Role of Audit Committee and information to be reviewed by the audit committee	18(3)	Yes
18	Composition of nomination & remuneration committee	19(1) & (2)	Yes
19	Quorum of Nomination and Remuneration Committee meeting	19(2A)	Yes
20	Meeting of Nomination and Remuneration Committee	19(3A)	Yes
21	Role of Nomination and Remuneration Committee	19(4)	Yes
22	Composition of Stakeholder Relationship Committee	20(1), 20(2) & 20(2A)	Yes
23	Meeting of Stakeholders Relationship Committee	20(3A)	Yes
24	Role of Stakeholders Relationship Committee	20(4)	Yes
25	Composition and role of risk management committee	21(1),(2),(3),(4)	NA
26	Meeting of Risk Management Committee	21(3A)	NA
27	Quorum of Risk Management Committee meeting	21(3B)	NA
28	Gap between the meetings of the Risk Management Committee	21(3C)	NA
29	Vigil Mechanism	22	Yes
30	Policy for related party Transaction	23(1), (1A), (5), (6), & (8)	Yes
31	Prior or Omnibus approval of Audit Committee for all related party transactions	23(2), (3)	Yes
32	Approval for material related party transactions	23(4)	NA
33	Disclosure of related party transactions on consolidated basis	23(9)	Yes
34	Composition of Board of Directors of unlisted material Subsidiary	24(1)	Yes
35	Other Corporate Governance requirements with respect to subsidiary of listed entity	24(2),(3),(4),(5) & (6)	Yes
36	Alternate Director to Independent Director	25(1)	NA
37	Maximum Tenure	25(2)	Yes
38	Appointment, Re-appointment or removal of an Independent Director through special resolution or the alternate mechanism	25(2A)	Yes
39	Meeting of independent directors	25(3) & (4)	Yes
40	Familiarization of independent directors	25(7)	Yes
41	Declaration from Independent Director	25(8) & (9)	Yes
42	Directors and Officers insurance	25(10)	NA
43	Confirmation with respect to appointment of Independent Directors who resigned from the listed entity	25(11)	NA
44	Memberships in Committees	26(1)	Yes
45	Affirmation with compliance to code of conduct from members of Board of Directors and Senior management personnel	26(3)	Yes
46	Policy with respect to Obligations of directors and senior management	26(2) & 26(5)	Yes
47	Approval of the Board and shareholders for compensation or profit sharing in connection with dealings in the securities of the listed entity	26(6)	NA
48	Vacancies in respect Key Managerial Personnel	26A(1) & 26A(2), 26A(3)	NA

Any other information to be provided

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

Annexure II		
1	Name of signatory	SHIKHA AGRAWAL
2	Designation	Company Secretary and Compliance

Signatory Details	
Name of signatory	Shikha Agrawal
Designation of person	Company Secretary and Compliance Officer
Place	Indore
Date	29-04-2025

Signatory Details	
Name of signatory	Shikha Agrawal
Designation of person	Company Secretary and Compliance Officer
Place	Indore
Date	29-04-2025

Investor Grievance Details	
No. of investor complaints pending at the beginning of Quarter	0
No. of investor complaints received during the Quarter	1
No. of investor complaints disposed off during the Quarter	1
No. of investor complaints those remaining unresolved at the end of the Quarter	0

Disclosure of Imposition of Fine or Penalty					
The details of imposition of fine or penalty during the quarter in terms of sub-para 20 of para A of Part A of Schedule III are given below:					
Any Other Information for Disclosure of Imposition of Fine or Penalty					Add Notes
Sr. No.	Name of the authority	Nature and details of the action(s) taken or order(s) passed	Date of receipt of direction or order, including any ad interim or interim orders or any	Details of the violation(s)/ contravention(s) committed or alleged to be committed	Impact on financial, operation or other activities of the listed entity, quantifiable in monetary terms to the
<div style="display: flex; justify-content: space-between; align-items: center;"> Add Del </div>					
1	NCDEX	Penalty of Rs. 28492/- (Without GST)	14-01-2025	Penalty levied for False Allocation of Excess Collateral for Jan 2025	There is no impact on the financials, operations, or other activities of the Company
2	NSE	Penalty of Rs. 115.69/- (Without GST)	17-01-2025	Internal Audit Violation	There is no impact on the financials, operations, or other activities of the Company
3	Globe Capital Market Ltd.	Penalty of Rs. 53.38/- (Without GST)	28-02-2025	Initial Margin Violation for the month of Jan 2025 in NSE	There is no impact on the financials, operations, or other activities of the Company
4	MCXCCL	Penalty of Rs. 2000/- (without GST)	10-03-2025	Delay in Submission of Delivery Documentation	There is no impact on the financials, operations, or other activities of the Company
5	NSDL	Penalty of Rs. 6,40,013/- (without GST)	10-03-2025	A monetary penalty has been imposed of Rs. 6,40,013/- plus GST under provisions of	There is no impact on the financials, operations, or other activities of the Company
6	NSE	Penalty levied of Rs. 100/- (Without GST)	19-03-2025	Non-uploading charges of CTCL Details on ENIT Portal	There is no impact on the financials, operations, or other activities of the Company
7	NSE	Penalty of Rs. 39227.43/- (Without GST)	31-03-2025	Penalty levied for short allocation of client collateral against its Margin	There is no impact on the financials, operations, or other activities of the Company
8	NCDEX	Penalty of Rs. 79925.61/- (Without GST)	31-03-2025	Penalty levied for short allocation of client collateral against its Margin	There is no impact on the financials, operations, or other activities of the Company
9	MCX	Penalty of Rs. 103092.72/- (Without GST)	31-03-2025	Penalty levied for short allocation of client collateral against its Margin	There is no impact on the financials, operations, or other activities of the Company
10	NCDEX	Penalty of Rs. 20,000/- (Without GST)	31-03-2025	Penalty for Non Compliance reported in Internal Audit for April 2024-Sep 2024	There is no impact on the financials, operations, or other activities of the Company

Disclosure of Updates to Ongoing Tax Litigations or Disputes				
Any Other Information for Disclosure of Updates to Ongoing Tax Litigations or Disputes				Add Notes
Sr. No.	Name of the opposing party	Date of initiation of the litigation / dispute	Status of the litigation / dispute as per last disclosure	Current status of the litigation / dispute
	Add	Delete		
1	Appeal filed and pending with the Commissioner of Income-tax (Appeals) with respect to FY 2017-18 for Rs. 5513812/- for disallowance on account of effect due to adoption of IND AS, routine stock exchange penalty and excess provision written back	22-02-2022	In Appeal before Hon'ble CIT(A).	Matter is pending before Hon'ble CIT(A).
2	Appeal filed and pending with the Commissioner of Income-tax (Appeals) with respect to FY 2013-14 for Rs. 17702530/- for erroneously adding the refund of amount already refunded to us by Income tax department on the basis of CIT Appeal order	28-03-2022	In Appeal before Hon'ble CIT(A).	Matter is pending before Hon'ble CIT(A).
3	Appeal filed and pending with the Commissioner of Income-tax (Appeals) with respect to FY 2014-15 for Rs. 7814644/- for assessment U/s 143(3) and 156 of the Income Tax Act, 1961.	29-12-2017	In Appeal before Hon'ble CIT(A).	Matter is pending before Hon'ble CIT(A).
4	Appeal filed and pending with Joint Commissioner CGST (Appeals), Indore, for FY 2018-19 for Rs. 5816356/- for the issue related to alleged excess Input Tax Credit Claim	26-12-2023	In Appeal before Hon'ble JC CGST (A).	Matter is pending before Hon'ble JC CGST (A).