

## **INTERNAL CONTROL POLICY**

### **PREAMBLE**

The foundation for efficient internal controls at M/s Shelter Infra Projects Limited is established by this policy. It describes the values, roles, and practices that guarantee the honesty, effectiveness, and responsibility of our business operations. This policy protects the organization's resources and assets by fostering an atmosphere of integrity, openness, and good governance.

### **OBJECTIVE**

By protecting assets, guaranteeing the accuracy and dependability of financial reporting, fostering operational efficiency, and promoting adherence to laws, regulations, and corporate policies, an internal control policy's main goal is to give a reasonable level of assurance that an organization accomplishes its goals. In essence, it's about reducing risks, stopping fraud, and encouraging an organization that operates smoothly and complies with regulations.

All activities adhere to the relevant laws, rules, governance, code of conduct, principles, policies, and guidelines; real-time information and reporting, both internally and externally, are accurate, dependable, and provided promptly; Internal controls and associated procedures have been put in place to motivate management and staff to perform their jobs effectively and dependably.

### **DEFINITIONS**

“Board” means the Securities and Exchange Board of India established under section 3 of the Act

“board of directors” or “board of trustees” shall mean the board of directors or board of trustees, whichever applicable, of the listed entity;

“Audit Committee” means committee of the board of directors of the company constituted under regulation 177 of the Companies Act and the provisions of the Listing Regulations from time to time.

“Internal control” refers to policies and procedures that a company adopts to ensure the orderly and efficient conduct of its business, including adherence to company policies, safeguarding of assets, prevention and detection of fraud and errors, and the accuracy and completeness of accounting records.

### **APPLICABILITY OF THE POLICY**

**SHELTER INFRA PROJECTS LIMITED**  
**CIN: L45203WB1972PLC028349**  
**ETERNITY BUILDING, DN-1, SECTOR - V, SALT LAKE, KOLKATA -700091**

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This policy shall apply across all over the operational, administrative and all other activities engaging the business of the organization.

### **INTERNAL CONTROL FRAMEWORK**

The methods and procedures that businesses employ to guarantee the accuracy of financial reporting, protect assets, increase operational effectiveness, and guarantee legal and regulatory compliance are known as internal controls.

They are essential to risk management and good governance because they guard against fraud, find mistakes, and guarantee the integrity of company processes.

The control environment, which includes the organizational structure, ethics, and values that direct the company's internal control strategy, is the cornerstone of the internal control system. It affects the organization's general control consciousness and sets the tone at the top.

**Risk assessment:** In order to accomplish their goals, organizations need to recognize and evaluate the risks they face. This entails being aware of possible dangers and weaknesses and creating plans to lessen them.

**Control Activities:** These are the particular measures and protocols implemented to deal with hazards that have been recognized. Authorization, documentation, reconciliation, security protocols, and job segregation are a few examples.

**Information and Communication:** Both internally and externally, information must be communicated clearly and promptly for internal control to be effective. This include reporting on operational problems, compliance difficulties, and financial performance.

**Monitoring:**

Monitoring: Businesses must keep an eye on how well their internal controls are working. This entails assessing if the controls are operating as intended, locating any flaws, and implementing the required fixes.

### **ROLES AND RESPONSIBILITIES**

To have effective and efficient internal control environment, following are the roles and responsibilities are defined for different levels of organization.

#### **1. Board of Directors and Audit Committee**

The Board of Directors sets the plan from the top by approving the Internal Control Policy as suggested by the audit committee. The Audit Committee is in charge of reviewing internal control and keeping an eye on how well the company's internal control systems for financial reporting are working. Along with Internal and External Audit, Risk Management, and Legal and Compliance, internal control-related concerns are regularly examined.

## 2. KMP's

It is the duty of KMPs to provide an efficient internal control environment within their areas of responsibility and to make sure that the functions are carried out appropriately. In all of their individual business and support function operations, KMPs are in charge of making sure that an appropriate internal control environment is set up and in conformity with the company's policies, principles, and guidelines.

## 3. Employee

When performing daily or sporadic tasks and responsibilities, each employee is expected to adhere to the company's procedures, rules, principles, and standards as well as any applicable laws and regulations. They should also engage in internal control activities. Everyone is accountable for acting morally and pursuing organizational goals.

## 4. Internal Audit

The internal audit function is in charge of independently certifying that the company's internal control environment is effective and promptly reporting these findings to the appropriate management, CFO, and Audit Committee. On internal control issues, the internal audit function also confers with every organization.

## **INTERPRETATION**

In any circumstance where the terms of this Policy differ from any existing or newly enacted law, rule or regulation governing the Company, the law, rule, or regulation will take precedence over this Policy and procedures until such time as this Policy is changed to conform to the law, rule or regulation.

## **AMENDMENTS TO THE POLICY**

The Board shall have the power to clarify any doubts or rectify any anomalies that may exist in connection with the effective execution of this Policy. The Board reserves the right to or amend this Policy from time to time based on changing requirements as prescribed by SEBI/Stock Exchange(s).

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**PUBLICATION OF POLICY**

The policy shall come into effect from July 22, 2025. A copy of the policy shall be made available on the website of the Company.

Note: In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities including SEBI, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provision shall under and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.