

SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)



REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR - V, SALT LAKE CITY, KOLKATA - 700 091

PH. :4003 2290

E-MAIL : info@ccapltd.in, WEBSITE : www@ccapltd.in, CIN - L45203WB1972PLC028349

Dated: 14.05.2025

To,
The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range, Dalhousie
Kolkata - 700001

Scrip Code: BSE: 526839

Scrip Code: CSE: 13077

Dear Sir,

Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2025

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are forwarding herewith the Annual Secretarial Compliance Report for the Financial Year 2024-25.

You are requested to kindly take the above information on record.

Thanking You,

Yours faithfully,

For SHELTER INFRA PROJECTS LIMITED

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

Encl: as above

C.S.SOMA SAHA

10. Old Post Office Street, Room No: 42a,
1st Floor, Right Block,
Kolkata-700001
M:9903273883
Email Id - saha.soma21@gmail.com
Pan No:CVAPS7554J

Secretarial compliance Report of Shelter Infra Projects Limited for the year ended 31.03.2025.

I have examined:

- (a) all the documents and records made available to us and explanation provided by **Shelter Infra Projects Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2025 ("Review Period") in respect of compliance with the provisions of:
 - (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined,

include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(NOT APPLICABLE)**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(NOT APPLICABLE)**
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(NOT APPLICABLE)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(NOT APPLICABLE)**



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(NOT APPLICABLE)**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; **(NOT APPLICABLE)**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) (other regulations as applicable)

and circulars/ guidelines issued there under and based on the above examination, I/We hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below: -

• Refer Annexure "A" annexed to the Report

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my/our examination of those records

(c) The listed entity has taken the following actions to comply with the observations made in previous reports:

• Refer Annexure "B" annexed to the Report

(d) I hereby report that, during the Review Period the compliance status of the listed entity with the following requirements

Sr. No.	Particulars	Compliance Status(Yes/No/NA)	Observations /Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India(ICSI)	YES	NOT ANY




2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> ● All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities ● All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	YES	NOT ANY
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> ● The Listed entity is maintaining a functional website ● Timely dissemination of the documents/ information under a separate section on the website ● Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website 	YES	NOT ANY
4.	Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	YES	NOT ANY
5.	Details related to Subsidiaries of listed entities have Been examined w.r.t.: <ul style="list-style-type: none"> (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as Other subsidiaries 	NA	The company does not have any subsidiary

Sr. No.	Particulars	Compliance Status(Yes/No/ NA)	Observations /Remarks by PCS*
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	YES	NOT ANY


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7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board Independent Directors and the Committees at the start of every financial year/during the financially ear as prescribed In SEBI Regulations.	YES	NOT ANY
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	YES NA	NOT ANY Company has taken prior approval.
9.	Disclosure of events or information: The listed entity has provided all the required is closure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed there under	NO	NOT ANY.
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) &3(6) SEBI (Prohibition of Insider Trading) Regulations,2015	YES	NOT ANY
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s)has been taken against the listed entity/ its promoters/directors/subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/guidelines issued there under The action taken against the listed entity/its promoters/ Directors/subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	YES	NOT ANY
12	Resignation of statutory auditors from the listed entity or its material subsidiaries In case of resignation of statutory auditor from the listed entity 'or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	During the financial year there is no such resignation of statutory auditor from the company.


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13.	Additional Non-compliances, if any: No additional non-compliance e observed for any SEBI regulation/circular/guidance note etc.	YES	NOT ANY
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Annexure "A"

The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

Sr. No	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA

Annexure "B"

Sr. No	Observations/Remarks of the Practicing Company Secretary	Observations made in the secretaries compliance report for the year ended 31.03.2024	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Details of Violation / deviation and actions taken / penalty imposed, if any, on the listed entity	Remedial Actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Company has not complied with the listing requirements/ filing requirements along with nonpayment of annual listing	Company has not complied with the listing requirements / filing requirements along with nonpayment of annual listing fees to the exchange	All compliance s	Not having access on the portal of the Calcutta stock exchange. Company has not complied with the listing	On current date and now company is filling all regulations correctly and properly in The	Have made proper communication to the stock exchanges via mails and posts but not updated on the portal due to not having the access of the portal which is duly rectified and



	along with nonpayment of annual listing fees to the exchange for a considerable period of time	annual listing fees to the exchange for a considerable period Of time		has not complied with the listing requirements/ filing requirements along with non-payment of annual listing fees to the exchange for a considerable period of time.	correctly and properly in The Calcutta Stock Exchange after retrieved user id and password.	having the access of the portal which is duly rectified and updated in the portal in the due course of time at on current date and now company is filling all regulations correctly and properly in The Calcutta Stock Exchange after retrieved user id and password.
2.	Inquiry against the company in exercise of the powers under section 206(4) of the companies act, 2013	Inquiry against the company in exercise of the powers under section 206(4) of the companies act, 2013 .	Order under section 206(4) of the companies act, 2013— in the matter of M/S SHELTER INFRA. PROJECTS LIMITED (CIN: L45203 WB197 2PLC02 8349)	Inquiry against the company according to section 206(4) of the companies act 2023	Concerned authority since the notice was received beyond the expected time frame the company has mailed on 21.02.2024 for the extension of some more days with regard to the arranging the required	As per the notice letter dated 12.02.2024 of the concerned authority since the notice was received beyond the expected time frame the company has mailed on 21.02.2024 for the extension of some more days with regard to the arranging the required documents and via mail and letter dated 26.02.2024 they have sent the documents managed to arrange so far as on that date.



3	<p>Summon under section 207(3)(b) of the companies act, 2013 — in the matter of M/S SHELTER INFRA PROJECTS LIMITED (CIN - L45203WB1 972PLC0283 49)</p>	<p>Summon against the company under section 207(3)(b) of the companies act, 2013.</p>	<p>Summon Under section 207(3)(b) of the companies act, 2013.</p>	<p>documents and via mail and letter dated 26.02.2024 they have sent the documents managed to arrange so far as on that date.</p> <p>Summon under section 207(3)(b) of the companies act, 2013.</p> <p>In exercise Of powers vested under section 207(3)(b) of the companies act, 2013, directors and kmps are hereby summoned to appear personally before the inquiry officer in his chamber on 29.02.2024 at 01:00 a. M. At the office of the registrar of companies-cum-official liquidator, Jharkhand, ministry of corporate affairs, mangal</p>	<p>Directors with kmps who had been summoned along with the required documents of the directors who can't be able to appear physically duly appeared before the concerned authority as on specified date and time and the matter is currently under observation.</p>
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The listed entity has taken the following actions to comply with the observations made in previous reports:



(e) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) or Registrar of Companies under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NA	NA	NA	NA	NA



CS Soma Saha
Practicing Company Secretary
Membership No.-A33125;
COP No.- 12237
PRC No: 1905
UDIN: A033125G000334624

Date:13.05.2025
Place: Kolkata

