

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: 22.07.2025

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- Disclosures under Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015

This is to inform you that the Board of Directors at its meeting held today i.e. on Tuesday, 22nd day of July, 2025, which commenced at 12.30 P.M. and concluded at 03.00 P.M. have considered and approved following items placed before the meeting :

1. This is to inform you that Ms. Vandana Nahata bearing Membership No. 302614, A Practicing Chartered Accountant has been appointed to act as Scrutinizer for E-voting process at the 53rd Annual General Meeting of the Company to be held on Wednesday, 03rd September, 2025.
2. The Board have considered and approved the updated the policies of the company.
3. The consent letter of Ms. Soma Saha (Practicing Company Secretary) as Secretarial Auditor of the Company for the five consecutive years i.e. starting from FY-2025-2026 and ending on FY- 2029-2030 whose appointment is subject to approval of the shareholders at forthcoming Annual General Meeting which has been scheduled to be held on Wednesday, 03rd September, 2025 duly considered and taken on record in the Board Meeting.

The above information shall also be made available on the website of the Company at www.ccapltd.in.

Kindly take the above information on your records.

Thanking You,
Yours faithfully,
For SHELTER INFRA PROJECTS LIMITED

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937

Encl: as above

VANDANA NAHATA & CO.
CHARTERED ACCOUNTANT



Date- 16/07/2025

To,
The Board of Directors of
M/S SHELTER INFRA PROJECTS LIMITED
ETERNITY BUILDING DN-1, SECTOR - V,
SALT LAKE, KOLKATA -700091

Dear Sir's/Madam,

Sub: Consent to act as Scrutinizer for E-voting process at the 53rd Annual General Meeting of the Company.

With reference to the above, Ms.Vandana Nahata, Chartered Accountant in Whole Time Practice having Membership No.: 302614, do hereby confirm my willingness and give my consent to act as Scrutinizer to scrutinize the E-voting process at the 53rd Annual General Meeting of your Company.

Thanking you.

For Vandana Nahata & Co.

Chartered Accountants

Vandana Nahata



CA Vandana Nahata
Practicing Chartered Accountant
Membership No. 302614

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

July 22, 2025

To,
CA Vandana Nahata
M/s. Vandana Nahata & Co.
Practicing Chartered Accountants
18, Mukhram Kanoria Road, 6th Floor,
Block – A, Howrah- 711101

Dear Madam,

Sub: Letter of Appointment of Scrutinizer for E-voting at the 53rd Annual General Meeting of the Company.

We are pleased to appoint you as Scrutinizer for E-Voting process at the 53rd Annual General Meeting of the Company to be held on Wednesday, 03rd September, 2025 in compliance with Rule 20 of the Companies (Management and Administration) Rules, 2014 in a fair and transparent manner.

Please acknowledge the same.

Thanking you,

For SHELTER INFRA PROJECTS LIMITED

Kamal Kishore Chowdhury
(Whole Time Director)
DIN: 06742937



INTERNAL FINANCIAL CONTROL POLICY

BACKGROUND

The policy framed under the authority of the board of directors seeks to define policies and procedures to be adopted by the company for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguard of its assets, the prevention and detection of its frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information.

DEFINITION

- i. "Board of Directors" or "Board" in relation to a Company means the collective body of Directors of the Company. [Section 2(10) of the Companies Act, 2013]
- ii. "Books and paper" and "Books or paper" as per section 2(12) of the Companies Act, 2013 'Books and paper' and 'Books or paper' include books of account, deeds, vouchers, writings, documents, minutes and registers maintained on paper or in electronic form.
- iii. "Books of account" as per section 2(13) of the Companies Act, 2013 'Books of account' includes records maintained in respect of – (i) all sums of money received and expended by a company and matters in relation to which the receipts and expenditure take place; (ii) all sales and purchases of goods and services by the company; (iii) the assets and liabilities of the company; and (iv) the items of cost as may be prescribed under section 148 in the case of a company which belongs to any class of companies specified under that section;
- iv. "Financial Statement" as per Section 2(40) of Companies Act, 2013 in relation to a Company means a Statement, which includes –
 - (i) A Balance Sheet as at the end of the financial year;
 - (ii) A Profit and Loss or in the case of a Company carrying on any activity not for profit, an income and expenditure account for the financial year;
 - (iii) Cash Flow Statement for the financial year;
 - (iv) Statement of changes in equity, if applicable; and
 - (v) Any explanatory note annexed to, or forming part of, any document referred to in sub-clause (i) to sub-clause (iv)
- v. "Internal Financial Controls" means the policies and procedures adopted by the Company for ensuring the orderly and efficient conduct of its business, including adherence to company's policies, the safeguard of its assets, the prevention and detection of its frauds and errors, the

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

accuracy and completeness of the accounting records, and the timely preparation of reliable financial information." vi. "Policy" means "Internal Financial Controls Policy."

OBJECTIVE

- i. To mitigate risks and provide reasonable assurance that operations are efficient and effective, assets are safeguarded.
- ii. Financial reporting is accurate and reliable.
- iii. To ensure companies resources are used prudently and in an efficient, effective and economical manner.
- iv. Resources of the company are adequately managed through effective internal controls.
- v. A framework for an effective internal control system which conveys to managers that they are responsible for ensuring that internal controls are established, documented, maintained and adhered to across the company.
- vi. To ensure the propriety of transactions, information integrity, compliance with regulations and achievements of company's objective through operational efficiency.

PURPOSE AND SCOPE

The purpose of the policy to make informed the employees of the internal financial controls of the company which is established by the board of the company to serve the stakeholders of the company. The company has framed the policy, procedures, and methods with regard to execute the operations of the company in a manner to achieve the objectives. Policy is basically a process which encompasses systems, policies and procedures that protect the assets of the Company, create reliable financial reporting, promote compliance with laws and regulations and achieve effective and efficient o operations. These systems are not only related to accounting and reporting but also relates to the organization's culture, communication process both internal and external, which include, handling of funds received and expenditure incurred by the Company, preparing appropriate and timely financial report to the Board and Officers, conducting the annual audit of the Company, Company's financial statements, evaluating staff and progress, maintaining records of its properties and maintaining personal and conflict of interest policies.

Internal control policy is prepared in accordance with ensure the compliance with the company policies and the laws applicable to the company. Whole Time Director and Chief Financial Officer are mainly responsible for implementing and maintaining the internal financial control and assist and recommend to the board to carry out the operation in the most compliant manner.

INTERNAL CONTROL FRAMEWORK

The company shall create, maintain accounting records and prepares maintains and manages the control framework in the respective fields:

1. Journal Book (Day Book)

- Records all day-to-day transactions in chronological order.
- Essential for initial recording of financial activities.

2. Ledger

- Classified summary of transactions posted from journals.
- Helps in preparing trial balances and financial statements.

3. Cash Book

- A detailed record of all cash and bank transactions.
- Often maintained separately to monitor liquidity and prevent fraud.

4. Purchase Register

- Tracks all purchases (cash or credit).
- Helps ensure procurement policies and approvals are followed.

5. Sales Register

- Records all sales invoices.
- Supports revenue recognition and tax compliance.

6. Fixed Asset Register

- Lists all fixed assets with acquisition date, cost, depreciation, etc.
- Helps safeguard assets and track depreciation as per law.

7. Inventory Register / Stock Register

- Maintains records of inventory movement and levels.
- Supports control over physical assets and valuation.

8. Payroll Register

- Records salary details, statutory deductions, bonuses, etc.
- Ensures HR and statutory compliance (PF, ESI, and TDS).

9. Bank Reconciliation Statements

- Regular reconciliation of bank book with actual bank statements.
- Identifies timing differences, errors, or frauds.

10. Statutory Registers

- Registers required under the Companies Act, such as:
 - Register of Members
 - Register of Directors
 - Register of Charges, etc.

Additional Records Supporting IFC:

- **Audit Trail (ERP/software logs)**
- **Internal audit reports**
- **Budget vs. actual analysis**
- **Internal checklists and control documentation**

ELEMENTS OF INTERNAL FINANCIAL CONTROLS:

1. Company policies
2. Responsibilities of the management
3. Delegation of Authority
4. Experienced and Trained workforce
5. Internal Audit System
6. Culture of the organization

COMPANIES ACT PROVISIONS WITH REPECT TO THE FINANCIAL CONTEROLS

In case of any issue and concerns Internal Auditor shall report to the Audit Committee and recommend the actions taken in this regard.lhe Audit committee in result shall forward the same to the board of Directors.

As per Section 134(5) (e) of the Companies Act, 2013 requires that Board of Directors shall lay down the details in respect of adequacy of internal financial controls with reference to the Financial Statements for the efficient functioning of the organization and achievement of the objectives.

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

As per Section 143(3) (i) of the Companies Act, 2013 requires statutory Auditors shall make statement in the Audit Report regarding adequacy of internal Financial; Controls and operating effectiveness of such controls.

SECTION 128. BOOKS OF ACCOUNT, ETC., TO BE KEPT BY COMPANY

Every company shall prepare and keep at its registered office books of account and other relevant books and papers and financial statement for every financial year which give a true and fair view of the state of the affairs of the company, including that of its branch office or offices, if any, and explain the transactions effected both at the registered office and its branches and such books shall be kept on accrual basis and according to the double entry system of accounting:

Provided that all or any of the books of account aforesaid and other relevant papers may be kept at such other place in India as the Board of Directors may decide and where such a decision is taken, the company shall, within seven days thereof, file with the Registrar a notice in writing giving the full address of that other place:

Provided further that the company may keep such books of account or other relevant papers in electronic mode in such manner as may be prescribed.

SECTION 129. FINANCIAL STATEMENT

(1) The financial statement shall give a true and fair view of the state of affairs of the company or companies comply with the accounting standards notified under section 133 and shall be in the form or forms as may be provided for different class or classes of companies in Schedule III:

Provided that the items contained in such financial statements shall be in accordance with the accounting standards:

At every annual general meeting of a company, the Board of Directors of the company shall lay before such meeting financial statements for the financial year

Where the financial statements of a company do not comply with the accounting standards referred to in sub-section (1), the company shall disclose in its financial statements, the deviation from the accounting standards, the reasons for such deviation and the financial effects, if any, arising out of such deviation.

SECTION 134. FINANCIAL STATEMENT, BOARD'S REPORT, ETC

(1) The financial statement, including consolidated financial statement, if any, shall be approved by the Board of Directors before they are signed on behalf of the Board by the chairperson of the company where he is authorized by the Board or by two directors out of which one shall be managing director, if any, and the Chief Executive Officer, the Chief

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

Financial Officer and the Company Secretary of the company, wherever they are appointed, or in the case of One Person Company, only by one director, for submission to the auditor for his report thereon.

The auditors' report shall be attached to every financial statement.

(3) There shall be attached to statements laid before a company in general meeting, a report by its Board of Directors, which shall include—

(a) the web address, if any, where annual return referred to in sub-section (3) of section 92 has been placed;

(b) Number of meetings of the Board;

(c) Directors' Responsibility Statement;

(ca) details in respect of frauds reported by auditors under sub-section (12) of section 143 other than those which are reportable to the Central Government;

(d) A statement on declaration given by independent directors under sub-section (6) of section 149;

(e) in case of a company covered under sub-section (1) of section 178, company's policy on directors' appointment and remuneration including criteria for determining qualifications, positive attributes, independence of a director and other matters provided under sub-section (3) of section 178;

(f) Explanations or comments by the Board on every qualification, reservation or adverse remark or disclaimer made—

(i) By the auditor in his report; and

(ii) By the company secretary in practice in his secretarial audit report;

(g) Particulars of loans, guarantees or investments under section 186;

(h) Particulars of contracts or arrangements with related parties referred to in sub-section (1) of section 188 in the prescribed form;

(i) The state of the company's affairs;

(j) The amounts, if any, which it proposes to, carry to any reserves;

(k) The amount, if any, which it recommends should be paid by way of dividend;

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

- (l) Material changes and commitments, if any, affecting the financial position of the company which have occurred between the end of the financial year of the company to which the financial statements relate and the date of the report;
- (m) The conservation of energy, technology absorption, foreign exchange earnings and outgo, in such manner as may be prescribed;
- (n) A statement indicating development and implementation of a risk management policy for the company including identification therein of elements of risk, if any, which in the opinion of the Board may threaten the existence of the company
- (o) The details about the policy developed and implemented by the company on corporate social responsibility initiatives taken during the year;
- (p) in case of a listed company and every other public company having such paid-up share capital as may be prescribed, a statement indicating the manner in which annual evaluation of the performance of the Board, its Committees and of individual directors has been made;
- (q) Such other matters as may be prescribed.

AS PER THE COMPANIES (ACCOUNTS) RULES, 2014

The Board's Report shall be prepared based on the stand alone financial statements of the company and shall report on the highlights of performance of subsidiaries, associates and joint venture companies and their contribution to the overall performance of the company during the period under report.

(viii) The details in respect of adequacy of internal financial controls with reference to the Financial Statements.

AS PER SECTION 177(4) (VII) the audit committee shall evaluate the internal financial controls of the company as well the risk management systems. Audit committee shall ensure with the duties and responsibilities as mentioned in section 177.

As per the compliance of regulation 138 company shall appoint an auditor who shall either be a chartered accountant or a cost accountant , or such other professional as may be decided by the Board to conduct internal audit of the functions and activities of the company.

AS PER COMPANIES (ACCOUNTS) RULES, 2014

Rule 13- The Audit Committee of the company or the Board shall, in consultation with the Internal Auditor, formulate the scope, functioning, periodicity and methodology for conducting the internal audit.

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

Related party transactions shall be as per the section 188 of the act.

RESPONSIBILITY AND ACCOUNTABILITY

Board of Directors, KMPs, Management and the employees of the company all are responsible in their sphere of the work to ensure proper internal control in the operations of the business. All of them shall be having proper knowledge and skills with respect to the sphere of the jobs. This ensures proper training on their respective jobs responsibilities. Adequate supervision by the higher levels over the operations. Internal Auditors also engage with the activities to ensure the proper financial control is in place and recommends any changes needed to the Audit committee. All levels of internal control are subject to examination by the statutory auditors who are required to report on the adequacy of internal controls over finance and compliance of the company.

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 amends this Policy from time to time based on changing requirements as prescribed by SEBI/Stock Exchange(s).

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.

RISK MANAGEMENT POLICY

PREAMBLE

Risk refers to the possibility of experiencing negative consequences or losses due to various factors that can hinder a company's ability to achieve its objectives or even lead to failure. It's the uncertainty that exists in the business environment, making it challenging to predict outcomes with certainty. Risk is an integral part and present in all business activities. Without risk there is no prediction of success in business because every future event cannot be predictable. To identify, assess, evaluate and mitigate risk every responsible member in an organization indeed engage to continuous work for the sake of the organization. The objective of this policy is to manage the risks involved in all sphere of the activities of the Company to maximize opportunities and minimize the adversity.

OBJECTIVES OF RISK MANAGEMENT POLICY

- a) To lay down a framework for identification of risk in the operational and decision making process of the business.
- b) Assessment and evaluation of risk
- c) Prescribe Measures for risk mitigation including systems and processes for internal control of identified risks.
- d) Protect the organization from the significant risk
- e) Provide recommendation, guidance and assistance in proper decision making process.
- f) Ensure sustainable business growth and safeguarding the business assets.

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.

“Risk”- the risk is the possibility that the occurrence of an event will adversely affect the achievement of the organization's objectives.

“Risk evaluation” is the process of determining the significance or potential impact of identified risks by comparing them against predefined criteria, often referred to as risk tolerance or acceptance levels. It involves making judgments about whether the identified risks are acceptable or require mitigation measures

“Risk Assessment”- Risk assessment is a systematic process of identifying potential hazards, analyzing the likelihood and consequences of those hazards, and implementing measures to mitigate those risks. It's a crucial part of risk management, helping organizations understand and prepare for potential negative impacts on their operations, assets, or personnel.

“Risk Management”- Risk management is the process of identifying, evaluating, and prioritizing potential risks, then taking steps to minimize their potential impact or probability of occurrence.

APPLICABILITY OF THE POLICY

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

RISK MANAGEMENT PROCESS

The systematic application of management policies, procedures and practices to the tasks of establishing the context, identifying, analyzing, evaluating, treating, monitoring and communicating risk.

Risks which can affect the business

1. Operational- for a limited company refers to the risk of loss resulting from failed internal processes, systems, human errors, or external events. It can disrupt business operations and affect efficiency, compliance, and reputation. Effective controls and monitoring are essential to minimize operational risk and ensure business continuity.
2. financial - for a limited company refers to the potential loss arising from poor cash flow, high debt, or market fluctuations, which may affect profitability and solvency. Managing financial risk ensures stability, compliance, and long-term sustainability of the company's operations.
3. Compliance & Legal: Risk of non-compliance with laws, environmental regulations, GST, labor laws, contract breaches, etc. Important due to government contracts and regulatory oversight.
4. Project Execution: Delays, cost overruns, or quality issues during project implementation. Common in EPC (Engineering, Procurement, Construction) contracts.

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

5. Market: Risk due to price fluctuations in raw materials (like steel, cement), demand uncertainty, or competition. Impacts profit margins and sales pipeline.
6. Strategic: Risk due to wrong business decisions, poor planning, or failure to adapt to market changes. Includes risk from overdependence on government contracts.
7. Environmental & Social: Risks arising from environmental impact, land acquisition issues, or public protests. Increasingly critical for infrastructure projects.
8. Human Resource : Shortage of skilled labor, employee turnover, or labor disputes affecting project timelines.
9. Sectoral- refers to the risk arising from adverse developments in a specific industry or sector, such as infrastructure, real estate, or construction. For a limited company, it includes regulatory changes, market slowdown, or policy shifts affecting that particular sector, potentially impacting profitability, operations, and long-term growth.
10. Information related: involves threats to data integrity, confidentiality, and availability. This includes risks from cyber attacks, data breaches, system failures, or misuse of sensitive project or financial information. Such risks can disrupt operations, lead to regulatory penalties, and damage the company's credibility and stakeholder confidence
11. Sustainability (particularly, ESG related risks): refers to potential threats arising from Environmental, Social, and Governance factors. For a company like Shelter Infra Projects Limited, this includes environmental compliance issues, labor practices, community impact, and governance failures. Poor ESG performance can lead to legal penalties, reputational damage, and loss of investor or stakeholder trust.

Risks Factors:

The objectives of the Company are subject to risks that are external and internal as enumerated below:

a. External Risk - Elements of the Market and Economic Environment exist in the company.

O The Political Context

O Competition

O The cost structure and inflation

O Concentration of Revenue

O Obsolescence of Technology

b. Elements of Internal Risk – Following are the elements internally exist in the company.

- O Hazards of Financial Reporting
- O Contractual Adherence
- O Local Law Adherence
- O Project Management and Quality
- O Management of the Environment
- O Management of Human Resources

In order to taken consideration on the applicable risk to the businesses risk management policy continuously work in order to mitigate the risks.

1. All business discussions and decisions shall be taken on care to the existent risk related to the decision.
2. All employees as well as the senior management must be aware of the risks related to their domain and their mitigation measures
3. The risk mitigation measures adopted by the company shall be effective in the long-term and to the extent possible be embedded in the business processes of the company.
4. The occurrence, progress and status of all risks will be promptly reported and appropriate actions be taken thereof.
5. The policy shall be continuously reviewed by the Audit committee and the board and shall make necessary recommendations.
6. Evaluation of risk shall include the estimation of risk duly compared with the risk criteria in the organization like strategy, growth, cost, talent, reputation and compliance.
7. In the process of risk mitigation following methods to be applied in managing the risks like Risk Avoidance, Risk Transfer, Risk Reduction, Risk Retention.
7. Any gaps in their desired risk appetite are identified and actions to be taken off.

RISK APPETITE

The critical element of Risk management framework is the risk appetite which is defines as extent of willingness to take the risk in pursuant to business objectives.

1. Shareholders interest and preferences.
2. Capital needed to support risk taking.
3. Culture of the organization
4. Management experience
5. Long term strategic policies.

RISK MANAGEMENT PLAN/SYSTEM

1. The committees ensure that appropriate methodology, processes and systems are in place to monitor and evaluate risks associated with the business of the Company;
2. The committees monitor and oversee implementation of the risk management policy, including evaluating the adequacy of risk management systems
3. Governance of Organizational and Delegation of authority is effectively managing the risk at their end and discussion reporting done at the board meeting regarding nature and content of its discussions, recommendations and actions to be taken.
4. A combination of centrally issued policies and divisionally – evolved procedures brings robustness to the process of ensuring business risks being effectively addressed.
5. Appropriate structures have been put in place to effectively address the inherent risks in businesses with unique / relatively high risk profiles.
6. Independent internal audit function carries out the audit in the risk focused manner identify risk and recommend the audit committee to the board the areas of internal controls where risk managements processes may need to be improved. The Audit Committee of the board reviews internal Audit findings and provides strategic guidance on internal controls and ensures that the internal audit recommendation to be effectively implemented. The board and the senior management periodically review the framework of the risk management to ensure effective continuation of operation of the business in the changing industry dynamics and evolving complexity.

ROLES AND ACCOUNTABILITIES

1. Board of Directors- the Board shall be responsible for framing, implementing and monitoring the risk management plan for the Company. The board of directors is regularly meet and discuss o the inter]vales when it's required to be check upon the internal controls and the expected risk or the mitigation of risk about risk assessment and minimization procedures...
2. Audit Committee – audit committee shall be responsible for implementing, evaluate, review and monitoring risk management policy and keep the board of directors informed about the nature and content of its discussions, recommendations and actions to be taken.

BUSINESS CONTINUITY PLAN

Business continuity plan shall be ensured and the company shall give rapid response to the risk hampering the operations of the business and consequences of the material risks being imposed on the business. Internal controls of the business should be at par with the business continuity.

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 amends this Policy from time to time based on changing requirements as prescribed by SEBI/Stock Exchange(s).

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.

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

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).

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

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.

C.S. SOMA SAHA

10. Old Post Office Street, Room No:
42A, 1st floor, Right Block
M: 9903273883
Email Id – saha.soma21@gmail.com
PAN NO: CVAPS7554J

Dated: 21.07.2025

To,
The Board of Directors
Shelter Infra Projects Limited
Eternity Building, DN-1, Sector-V,
Salt Lake, Kolkata -700091

Sub: Consent to act as Secretarial Auditor of Shelter Infra Projects Limited for the term of five years i.e. financial year 2025-2026 up to financial year 2029-2030

Dear Sir/Madam,

I, Soma Saha, Practicing Company Secretary, holding COP No. 12237 and Membership No. 33125 hereby give my consent to be appointed as Secretarial Auditor of M/s Shelter Infra Projects Limited for the financial year 2025-2026 up to financial year 2029-2030 under the provisions of Section 204 of the Companies Act, 2013 read with of Rule 9 Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and all other applicable provisions and circulars.

I further confirm that:

1. I am eligible to be appointed as secretarial auditor under the provisions of the Companies Act, 2013 and the applicable rules made thereunder along with the circulars passed and regulations framed by the Securities and Exchange Board of India.
2. I am not disqualified to act as a secretarial auditor under any law.
3. I hold a valid Certificate of Practice issued by the Institute of Company Secretaries of India.

Kindly consider this letter as my formal consent for the said appointment. I look forward to a Professional relationship with the Company.

Thanking You,

Yours Faithfully,

Soma Saha

Soma Saha
Practicing Company Secretary
ACS: 33125
COP : 12237

