



# SUBHKAM VENTURES

## DIRECTORS' REPORT

To  
The Members  
SUBHKAM VENTURES (I) PRIVATE LIMITED

Your Directors have pleasure in presenting the Twenty Ninth Annual Report together with Audited Accounts of the Company for the year ended 31<sup>st</sup> March, 2024:

### FINANCIAL RESULTS

Particulars	(in Lakhs)			
	Standalone		Consolidated	
	Year ended 31/03/2024 (INR)	Year ended 31/03/2023 (INR)	Year ended 31/03/2024 (INR)	Year ended 31/03/2023 (INR)
Revenue From Operation	1,97,057.67	1,65,643.91	1,96,882.16	1,65,793.71
Other Income	225.52	148.61	225.52	151.64
Total Income	1,97,283.19	1,65,792.52	1,97,107.68	1,65,945.35
Depreciation	134.39	132.52	166.19	166.34
Profit before depreciation and Tax	24,738.99	(3,759.69)	24,542.88	(3,631.22)
Exceptional items	-	-	104.72	-
Profit before Tax	24,604.60	(3,892.21)	24,481.41	(3,797.56)
<b>Provision for Taxation</b>				
- Current Tax	4,590.00	1,210.00	4,590.00	1,322.60
- Deferred Tax	2,316.43	(1,786.94)	2,316.50	(1,785.47)
- Provision for Tax earlier year	(1.54)	-	(1.54)	(0.61)
<b>Profit after taxation</b>	<b>17,804.43</b>	<b>(3,315.27)</b>	<b>17,576.45</b>	<b>(3,334.08)</b>

### OPERATIONS

Your Directors are pleased to update you that during the year under review, your Company recorded a profit after tax of Rs. 178.04 Crore on standalone basis and Rs. 175.76 Crore on consolidated basis in the financial year 2024, as compared to a loss Rs. 33.15 Crores on standalone basis and Rs. 33.34 Crores on consolidated basis in the previous year ended 2023.

As our business continues to remain focused on equities, general capital market performance shall always have a bearing on our performance.

In the reporting year FY 2023-2024, the Indian stock market delivered an exceptional year. The benchmark Nifty50 spiked up an impressive 28.6% in FY24, outperforming most major market indices globally. We are happy to report that your company achieved above par results when compared to over all markets performances. As our economy continues to perform comparatively quite well among the largest economies of the world, despite disturbances due to geopolitical conflicts across the different parts of the world, we believe your company is poised to make the next leap.

### **Subhkam Ventures (I) Private Limited**

CIN : U67120MH1995PTC093556

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Yours Directors believe for good reasons, that India shall remain the brightest spot in the world arena and expect to see equity markets rewarding its participants in the ensuing FY 2024-2025 and the years ahead.

As we write this note to you, dear esteemed shareholders; it is heartening to see the progress your company achieved to date in the current financial year. Also, as we write, your company has crossed the threshold as defined by RBI and have moved into the Middle Layer NBFC category.

Your directors wish to place on record the incessant hard work our team of professionals driving research, investment, trading, risks and operations, for their consistency in performance and commitment to the cause and our value systems.

Your directors shall endeavor to build on the current base and believe our efforts as team shall be value accretive to all the stakeholders. We believe and work towards further building an organization of repute which be known for the values we stand for.

In the end, your directors wish to state that the best is yet to unfold!

## **TRANSFER TO RESERVES**

During the year under review, Company has transferred Rs. 72.44 Crores to Statutory Reserve Fund created in terms of Section 45-IC of the RBI Act, 1934.

## **DIVIDEND**

Your Directors do not propose any dividend for the Financial Year ended 31<sup>st</sup> March, 2024.

## **SHARE CAPITAL**

The paid-up Equity Share Capital of the Company as on 31<sup>st</sup> March, 2024 was at Rs. 199.00 Lacs. The Company has not issued any further equity capital during the year under review i.e. financial year 2023-2024, and has also not issued any shares with differential voting rights, nor granted any stock options or sweat equity, at any time including during the year under review.

However, during the current year, the Scheme of Amalgamation of Flowers Valley Private Limited (Transferor Company) with your Company has been approved by the National Company Law Tribunal, Mumbai Bench vide order dated 26<sup>th</sup> July 2024, delivered on 02<sup>nd</sup> August 2024 and pursuant to the said Scheme of amalgamation your Company is required to issue 14 number of preference shares of Rs. 10/- each fully paid up of Subhkam Ventures (I) Private Limited to the shareholders of M/s. Flowers Valley Private Limited (Transferor Company) for each Equity share held by the shareholders of the Flowers Valley Private Limited in Flowers Valley Private Limited.

On the date of this meeting, the process for issuing such preference shares is under process and the Preference shares to be issued pursuant to the scheme has been accounted as Preference Share Capital – Suspense Account under the heading Share Capital in the Balance Sheet as at 31<sup>st</sup> March 2024.

## **MEETINGS OF THE BOARD OF DIRECTORS/ COMMITTEE**

During the year under review Board met 9 (Nine) times on 15<sup>th</sup> April 2023, 27<sup>th</sup> April 2023, 18<sup>th</sup> May 2023, 29<sup>th</sup> June 2023, 31<sup>st</sup> July 2023, 28<sup>th</sup> August 2023, 05<sup>th</sup> September 2023, 14<sup>th</sup> December 2023 and 09<sup>th</sup> February 2024. The intervening gap between the Meetings was within the period prescribed under the Companies Act, 2013.

<b>Sr. No.</b>	<b>Name of the Directors</b>	<b>No. of Board Meetings held during the year</b>	<b>Number of Board Meeting Attended</b>	<b>Last AGM Attended</b>
1	Mr. Manu Punnoose	9	9	30/09/2023
2	Mr. Rakesh Kathotia	9	9	30/09/2023
3	Mr. Rishabh R. Kathotia	9	9	30/09/2023
4	Mr. Vishal Agarwal	9	1	-

Besides, during the year the following committees meeting were held-

Sr. No.	Name of the Committee	No. of Meeting held
1	Asset- Liability Committee	4
2	Risk Management Committee	4
3	Audit Committee	4
4	Nomination Committee	1
5	Corporate Social Responsibility Committee	2

#### **COMPANY'S POLICY RELATING TO DIRECTORS APPOINTMENT, PAYMENT OF REMUNERATION AND DISCHARGE OF THEIR DUTIES:**

Though the provisions of Section 178(1) relating to constitution of Nomination and Remuneration Committee is not applicable to the Company, during the year under review, your company constituted Nomination Committee and adopted the policy with respect to fit and proper criteria of Directors i.e. "Policy on Fit and Proper Criteria of Directors" in compliance with applicable NBFC Directions.

The Committee reviews, acts on and reports to the Board with respect to various nomination and remuneration matters.

#### **MATERIAL CHANGES AND COMMITMENTS**

No material changes and commitments affecting the financial position of the Company occurred between the end of the financial year, to which the financial statement under review relates and the date of this report.

Though there is a receipt of the order by National Company Law Tribunal, Mumbai Bench dated 26<sup>th</sup> July 2024, delivered on 02<sup>nd</sup> August 2024 for amalgamation of Flowers Valley Private Limited (Transferor Company) with your Company being the Transferee Company.

#### **ANNUAL RETURN**

Pursuant to Section 92(3) read with Section 134 (3) (a) of the Act, the Annual Return as on March 31, 2024 in e-form MGT 7 will be filed with Registrar of Company/MCA by the Company after the conclusion of the ensuing AGM.

#### **LOANS, GUARANTEES AND INVESTMENTS**

The provisions of Section 186 of the Act pertaining to investment and lending activities is not applicable since the Company is a Non- Banking Finance Company registered with the RBI, whose principal business is lending and acquisition of securities. During the year under review, the Company has not provided any guarantee.

#### **STATUTORY AUDITORS**

M/s. Mehta Chokshi & Shah LLP, Chartered Accountants, (Firm Registration No. 106201W), were appointed as the Statutory Auditors of the Company from the conclusion of the 24<sup>th</sup> Annual General Meeting until the conclusion of 29<sup>th</sup> Annual General Meeting for the financial year ending 31<sup>st</sup> March, 2024.

Therefore, in terms of Section 139(1) and 141 of the Companies Act, 2013, M/s. Bathiya & Associates LLP, Chartered Accountants are eligible for being appointed as Statutory Auditor of the Company and hence, your Directors recommend the appointment of M/s. Bathiya & Associates LLP, Chartered Accountants for the term of 3 years who shall hold office from the conclusion of the ensuing Annual General Meeting till the conclusion of its 32<sup>nd</sup> Annual General Meeting (i.e. Financial Year 2026-2027).

The Company has also received letter from M/s. Bathiya & Associates LLP, Chartered Accountants, to the effect that their appointment as Statutory Auditors, if made, would be within the prescribed limits under Section 141 of the Companies Act, 2013 and that they are not disqualified for appointment.

The Audit Report of M/s. Mehta Chokshi & Shah LLP, Chartered Accountants on the Financial Statements of the Company for the Financial Year 2023-2024 forms a part of the Annual Report.

#### **DETAILS OF FRAUDS REPORTED BY AUDITORS UNDER SUB-SECTION 12 OF SECTION 143 OF THE COMPANIES ACT, 2013, OTHER THAN THOSE WHICH ARE REPORTABLE TO THE CENTRAL GOVERNMENT**

There are no frauds reported by auditor under Sub Section 12 of Section 143 of the Companies Act, 2013, other than those which are reportable to the Central Government.

#### **RELATED PARTY TRANSACTIONS**

All the Related Party Transactions during the year under review, were at arm's length and in the ordinary course of business and the Company did not enter into any material transaction or contract or arrangement with any related party and accordingly, disclosure in the prescribed form AOC-2 does not form part of this report.

Further, the detailed disclosure of Related Party Transactions as per IND AS-24 containing the name of the related party and details of the transactions entered with such related party have also been provided in the Annexure 2 to Note (H) of Notes to financial Statements.

#### **DETAILS OF AMOUNT RECEIVED FROM A DIRECTOR OF THE COMPANY OR A RELATIVE OF THE DIRECTOR**

Your Board of Directors report that during the year under review, the Company has an outstanding loan received from the Mr. Rakesh S. Kathotia, Managing Director of the Company, also during the year company received loan from Mr. Rakesh S. Kathotia, pursuant to Rule 2(1)(c)(viii) of the Companies (Acceptance of Deposits) Rules, 2014. The same was repaid during the year. The said loan was received from his own funds and the declaration to that effect is obtained. Also, the disclosure of the same is given in the Notes to financial statements forming part of the accounts for the year ended 31<sup>st</sup> March, 2024.

#### **RISK MANAGEMENT**

The Company is exposed to all risks & threats which Financial Market & Non-Banking Finance Company faces. In the capital market, effective risk management has become very crucial. The company has a risk management Policy in place to effectively manage the risk associated with the business of the Company. ..

Asset Liability Management Committee (ALCO) and Risk Management Committee oversees the Risk Management and evaluate the risk assessment and management procedures and status from time to time.

#### **INTERNAL FINANCIAL CONTROL SYSTEMS**

The Company maintains appropriate systems of internal financial controls, including monitoring procedures, commensurate with the size of business of the Company. The Internal Auditors review the efficiency and effectiveness of these systems and procedures. The Internal Auditors submit their Report periodically which is placed before and reviewed by the Audit Committee. The Internal Financial control measures focuses on evaluating the reliability of financial and operational information and ensuring compliances with applicable laws and regulations.

#### **DETAILS OF DIRECTORS & KEY MANAGERIAL PERSONNELS**

During the period under review, Mr. Vishal Agarwal was appointed as Additional Director of the Company at the Board Meeting dated 14<sup>th</sup> December, 2023. Apart from this, there was no change in the constitution of Board of Directors.

None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013.

## PUBLIC DEPOSITS

The Company has not accepted any deposit from the public during the year under review.

## SUBSIDIARIES, JOINT VENTURES AND ASSOCIATE COMPANIES AND CONSOLIDATION OF ACCOUNTS

The Company has the following subsidiaries:

**Flowers Valley Floriculture Private Limited:** Flowers Valley Floriculture Private Limited is a wholly owned subsidiary of Subhkam Ventures (I) Private Limited. The Company has incurred loss of Rs. 2.28 Crores during the year.

**Flowers Valley Private Limited:** Flowers Valley Private Limited is subsidiary of Subhkam Ventures (I) Private Limited.

Flowers Valley Private Limited has been merged with your Company vide the order of hon'ble National Company Law Tribunal; Mumbai Bench dated 26<sup>th</sup> July 2024, delivered on 02<sup>nd</sup> August 2024 for amalgamation of Flowers Valley Private Limited (Transferor Company) with your Company being the Transferee Company. A merged balance sheet has been prepared for the Subhkam Ventures (I) Private taking the same into consideration.

The Company has following Joint Venture

**Milton Global Limited:** Milton Global Ltd. (the "JV Company") is a Joint Venture company; based on Joint Venture Agreement dated 14<sup>th</sup> July, 2001. The company is not having any of its representatives on the board of the JV Company for last several years. The Company did not have any transaction with JV Company since the FY 2001-02, and the JV Company is also not providing financial Statements of the company. As reported in earlier years, litigation with respect to operation and affairs of JV Company is going on with the JV Company and its promoters. Accordingly, in absence of financial statement of JV Company, it has not been possible for the Company to consolidate the financial statements of JV Company, and hence the accounts of joint venture (JV Company) have not been considered for consolidation.

The Company has following associates companies

- 1. Teck Consultancy & Services Private Limited:** Your Company holds 25.46% of the equity capital of the Company. The Company is a registered Non-Banking Finance Company and the main activity of the Company is investing in shares and securities. The Company achieved a net profit of Rs. 33.58 crores during the financial year ended 31.03.2024.
- 2. Rewardport Corporate Solutions Private Limited:** Your company holds 40% of the equity capital of the Company, hence it is associate Company owing to its holding of share capital of the Company. There is no significant influence or control over the company and hence its not consolidated with your company.
- 3. Nagarjuna Agri-Tech Limited:** During the year under review, your company exited the investment in Nagarjuna Agri-Tech Limited and hence it ceases to be the associate of your Company.

The consolidated financial results reflect the operations of Flowers Valley Private Limited (now merged ) and Flowers Valley Floriculture Private Limited, Subsidiaries of the Company and Teck Consultancy & Services Private Limited, Associate Company.

Rewardport Corporate Solutions Private Limited is also the associate Company of the Company, as the Company is holding more than 20% of the Share Capital of the Company. But in case of Associate Enterprise Rewardport Corporate Solutions Private Limited and and the Joint Venture, Milton Global Limited, the financial statements have not been consolidated for the reasons stated under the head "Principles of consolidation" in notes to the consolidated financial statements appended to Consolidated Financial Statements. Also, the detailed explanation relevant to Subsidiaries, Associates and Joint Ventures and the consolidation thereof can be referred under the head "Principles of consolidation" in notes to accounts appended to Consolidated Financial Statement.



A statement containing the salient features of the financial statements of the subsidiary company and associate companies is annexed to the Financial Statements in Form AOC-1 "Annexure I".

## **COMPLIANCE**

The Company is registered Non-deposit accepting NBFC. The Company has complied with and continues to comply with all the applicable laws, rules, circulars and regulations, including the RBI Directions.

During FY 2023-2024, there were no frauds committed by the Company and no frauds committed on the Company by its officers or employees.

Further, during FY 2023-2024, there were no frauds reported by the Statutory Auditors to the Audit Committee or the Board under section 143(12) of the Act.

## **DETAILS OF SIGNIFICANT AND MATERIAL ORDERS PASSED BY THE REGULATORS, COURTS AND TRIBUNALS**

During the year under review, the Company has received an order by National Company Law Tribunal, Mumbai Bench dated 26<sup>th</sup> July 2024, delivered on 02<sup>nd</sup> August 2024 for amalgamation of Flowers Valley Private Limited (Transferor Company) with your Company being the Transferee Company.

## **DISCLOSURES UNDER SEXUAL HARASSMENT OF WOMEN AT WORKPLACE (PREVENTION, PROHIBITION & REDRESSAL) ACT, 2013**

The Company is committed to providing a work environment which ensures that every woman employee is treated with dignity and respect and afforded equitable treatment. The Company is also committed to promoting a work environment that is conducive to the professional growth of its women employees and encourages equality of opportunity.

Your directors further state that the Company has put in place the Policy for Prevention / Prohibition / Redressal of Sexual Harassment of Women at the Workplace and also constituted an Internal Complaints Committee in accordance with Section 4 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, to hear and dispose of the cases relating to sexual harassments.

During the year under review, there were no cases filed pursuant to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013.

## **WHISTLE BLOWER POLICY/ VIGIL MECHANISM**

In accordance with sub-sections (9) and (10) of Section 177 of the Companies Act, 2013, the Company has in place a Vigil Mechanism (Whistle Blower Policy) to enable the Directors and employees to report concerns about unethical behavior, actual or suspected fraud, or violation of the Company's Code of Conduct.

The mechanism provides for adequate safeguards against the victimization of persons who use such a mechanism and makes provision for direct access to the Chairperson of the Audit Committee in appropriate cases.

During the financial year ended March 31, 2024, the Company has not received any whistleblower complaints.

## **EXPLANATION OR COMMENTS BY THE BOARD ON EVERY QUALIFICATION, RESERVATION OR ADVERSE REMARK OR DISCLAIMER MADE:**

- a) **By the auditor in his report:** There are no adverse comments by the Statutory Auditor of the Company in their report submitted to the Company.
- b) **The Company Secretary in practice in his Secretarial Audit Report:** Secretarial Audit Report by a Company Secretary in Practice pursuant to the provisions of the Section 204 of the Companies Act, 2013 is not applicable to the Company.

## **CORPORATE SOCIAL RESPONSIBILITY INITIATIVES**

In compliance with the provisions of Section 135 of the Companies Act, 2013 read with Companies (Corporate Social Responsibility Policy) Rules, 2014, the Board of Directors have constituted Corporate Social Responsibility (CSR) Committee under the Chairmanship of Mr. Rakesh S. Kathotia and member- Mr. Manu Punnoose. The Board of Directors of the Company has duly approved the CSR Policy based on the recommendation of the CSR Committee. The CSR policy of the Company is annexed as "Annexure II".

During the year under review, the CSR committee recommended and approved the Annual Action Plan in order to carry out the CSR activities for the financial year 2023-2024. The CSR activities were carried out through various implementing agencies.

The CSR obligation of the Company for Financial Year 2023-2024 was Rs. 1,57,53,776/-. During the year, there was no unspent CSR amount as the Company has spent an amount of Rs. 1,20,00,000/- towards the CSR through the implementing agencies and has claimed the set off of Rs. 45,88,031/- from the excess spent of Financial year 2022-2023. The Annual Report on the CSR activities undertaken by your Company during the year under review, as prescribed in the Companies (Corporate Social Responsibility Policy) Rules, 2014, as amended, is set out in "Annexure III" of this Report.

## **INSOLVENCY AND BANKRUPTCY CODE, 2016**

During the year under review there are no applications made or any proceeding pending under the Insolvency and Bankruptcy Code, 2016 (31 of 2016), also during the period under review there are no outstanding or pending cases.

## **DIRECTOR'S RESPONSIBILITY STATEMENT**

As required under Section 134(5) of the Companies Act, 2013, your Directors hereby confirm that:

- a. in the preparation of the Annual Accounts for the year ended 31<sup>st</sup> March, 2024, the Company has followed the applicable accounting standards with proper explanation relating to material departures, if any;
- b. the Directors have selected such accounting policies and applied them consistently and made judgments and estimates that are reasonable and prudent, so as to give a true and fair view of the state of affairs of the Company at the end of the financial year 2023-2024, i.e. as at 31<sup>st</sup> March, 2024 and of the Profit of the Company for the year ended on that date;
- c. the Directors have taken proper and sufficient care for the maintenance of adequate accounting records in accordance with the provisions of the Companies Act, 2013, for safeguarding the assets of the Company and for preventing and detecting fraud and other irregularities;
- d. the Directors have prepared the Annual Accounts on a going concern basis.
- e. the Directors have devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

## **CONSERVATION OF ENERGY, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS & OUTGO:**

### **A. Conservation of Energy, Technology Absorption**

Since the Company's operations do not involve any manufacturing or processing activities, the particulars required pursuant to section 134(3)(m) of the Companies Act, 2013 read with rule 8 of the Companies (Accounts) Rules, 2014 regarding conservation of energy and technology absorption, are not applicable.

### **B. Foreign Exchange Earnings and Outgo**

There is no foreign earnings and Outgo during the year.

## PARTICULARS OF EMPLOYEES, KEY MANAGERIAL PERSONNEL AND RELATED DISCLOSURES

Particulars of employees as required under section 197 read with rule 5 of the Companies (Appointment and Remuneration of managerial Personnel) Rules, 2014 in respect of employees of the Company are not applicable to your Company.

## ACKNOWLEDGEMENT

Your Directors acknowledge with gratitude the sincere co-operation and assistance received by the company from its bankers, business associates, government departments, shareholders and employees.

For and on behalf of the Board of Directors  
For Subhkam Ventures (I) Private limited



Rakesh S. Kathotia  
Managing Director  
DIN: 00165880

*Rishabh Kathotia*

Rishabh R. Kathotia  
Director  
DIN: 08314685

Place: Mumbai  
Date: 04/09/2024



## Annual Report on Corporate Social Responsibility (CSR) Activities

### **Brief outline on CSR Policy of the Company.**

Subhkam Ventures (I) Private Limited "Company" believes in a philosophy of Share, Care, Urge, Build & Advance ("SCUBA") as we know it) adopting sustainable business practices which are beneficial to the various stakeholders including the society. Through its corporate values, Company constantly endeavours to actively contribute to the social and economic development of the communities in which it operates. To further the Company's CSR philosophy, a formal policy on CSR is being formulated to align its practices with requirements of Companies Act, 2013 and rules made there under.

#### **1) Composition of CSR Committee:**

Sl. No.	Name of Director	Designation / Nature of Directorship	Number of meetings of CSR Committee held during the year	Number of meetings of CSR Committee attended during the year
1	Mr. Rakesh S. Kathotia	Managing Director	2	2
2	Mr. Manu Punnoose	Wholtime Director	2	2

- 2) Provide the web-link where Composition of CSR committee, CSR Policy and CSR projects approved by the board are disclosed on the website of the company: **Not Applicable.**
- 3) Provide the details of Impact assessment of CSR projects carried out in pursuance of sub-rule (3) of rule 8 of the Companies (Corporate Social responsibility Policy) Rules, 2014, if applicable (attach the report): **Not Applicable**
- 4) Details of the amount available for set off in pursuance of sub-rule (3) of rule 7 of the Companies (Corporate Social responsibility Policy) Rules, 2014 and amount required for set off for the financial year, if any:

Sl. No.	Financial Year	Amount available for set-off from preceding financial years (in Rs)	Amount required to be set-off for the financial year, if any (in Rs)	Balance Amount (in Rs.)
1	2022-2023	45,88,031	45,88,031	0
	<b>Total</b>	<b>45,88,031</b>	<b>45,88,031</b>	<b>0</b>

- 5) Average net profit of the company as per section 135(5): **Rs. 78,76,88,804/-**
- 6) (a) Two percent of average net profit of the company as per section 135(5): **Rs. 1,57,53,776/-**
  - (b) Surplus arising out of the CSR projects or programmes or activities of the previous financial years: **Not Applicable**
  - (c) Amount required to be set off for the financial year, if any: **Rs. 45,88,031/-**
  - (d) Total CSR obligation for the financial year (7a+7b-7c): **Rs. 1,11,65,745/-**
- 7) (a) CSR amount spent or unspent for the financial year:

Total Amount Spent for the Financial Year.	Amount Unspent (in Rs.)	
	Total Amount transferred to Unspent CSR Account as	Amount transferred to any fund specified under Schedule VII as per second proviso to section

(in Rs.)	per section 135(6).		135(5).		
	Amount.	Date of transfer.	Name of the Fund	Amount.	Date of transfer.
1,20,00,000	0	NA	NA	0	NA

(b) Details of CSR amount spent against ongoing projects for the financial year: Not Applicable

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	(9)	(10)	(11)	
Sl. No.	Name of the Project.	Item from the list of activities in Schedule VII to the Act.	Local area (Yes/No).	Location of the project.		Project duration.	Amount allocated for the project (in Rs.).	Amount spent in the current financial year (in Rs.).	Amount transferred to Unspent CSR Account for the project as per Section 135(6) (in Rs.).	Mode of Implementation - Direct (Yes/No).	Mode of Implementation - Through Implementing Agency	
				State.	District.						Name	CSR Registration number.
1.												
	Total											

(c) Details of CSR amount spent against other than ongoing projects for the financial year:

(1)	(2)	(3)	(4)	(5)		(6)	(7)	(8)	
Sl. No.	Name of the Project	Item from the list of activities in schedule VII to the Act	Local area (Yes/No).	Location of the project.		Amount spent for the project (in Rs.)	Mode of implementation - Direct (Yes/No)	Mode of implementation - Through implementing agency.	
				State	District			Name.	CSR registration number.
1.	Amount spent towards a project which supports holistic educational approach for the betterment of the children	Clause (ii) of Schedule VII- promoting education	Yes	Mumbai,	Maharashtra	35,00,000	No	Anuvrat Vishva Bharati Society	CSR00014522
2	Amount spent towards Construction of museum for promoting Art and Culture.	Clause (v) of Schedule VII- Art and Culture.	No	Churu,	Rajasthan	50,00,000	No	Jain Swetamber Terapanthi Trust	CSR00012351
3	Construction of Class rooms/ Schools for rural education	Clause (ii) of Schedule VII- promoting	No	Baran,	Rajasthan	2,00,000	No	Manav Seva Charitable Trust	CSR00019471

		education						
4	Construction of Building for providing moral education to general public	Clause (ii) of Schedule VII- promoting education	No	Ernakulam , Kerala	30,00,000	No	Shri Jain Swetamber Terapanthi Sabha	CSR00067660
5	Promoting Education, Medical and General Public Utility	Clause (ii) of Schedule VII- promoting education	Yes	PAN India	3,00,000	No	Subhkam Charitable Trust	CSR00008379
<b>Total</b>					<b>1,20,00,000</b>			

(d) Amount spent in Administrative Overheads: NIL

(e) Amount spent on Impact Assessment, if applicable: NIL

(f) Total amount spent for the Financial Year (8b+8c+8d+8e): Rs. 1,20,00,000/-

(g) Excess amount for set off, if any

Sl. No.	Particular	Amount (in Rs.)
(i)	Two percent of average net profit of the company as per section 135(5)	1,11,65,745
(ii)	Total amount spent for the Financial Year	1,20,00,000
(iii)	Excess amount spent for the financial year [(i)-(i)]	8,34,255
(iv)	Surplus arising out of the CSR projects or programmes or activities of the previous financial years, if any	Nil
(v)	Amount available for set off in succeeding financial years [(iii)-(iv)]	8,34,255

8) (a) Details of Unspent CSR amount for the preceding three financial years: **Not Applicable**

Sl. No.	Preceding Financial Year.	Amount transferred to Unspent CSR Account under section 135 (6) (in Rs.)	Amount spent in the reporting Financial Year (in Rs.).	Amount transferred to any fund specified under Schedule VII as per section 135(6), if any.			Amount remaining to be spent in succeeding financial years. (in Rs.)
				Name of the Fund	Amount (in Rs.)	Date of transfer.	
1.				-	-	-	-
	<b>Total</b>						

(b) Details of CSR amount spent in the financial year for ongoing projects of the preceding financial year(s): **Not Applicable**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Sl. No.	Project ID.	Name of the Project.	Financial Year in which the project was commenced.	Project duration.	Total amount allocated for the project (in Rs.).	Amount spent on the project in the reporting Financial Year (in Rs.).	Cumulative amount spent at the end of reporting Financial Year. (in Rs.)	Status of the project - Completed /Ongoing.

1								
	Total							

- 9) In case of creation or acquisition of capital asset, furnish the details relating to the asset so created or acquired through CSR spent in the financial year (**asset-wise details**). **Not applicable**

(a) Date of creation or acquisition of the capital asset(s).

(b) Amount of CSR spent for creation or acquisition of capital asset.

(c) Details of the entity or public authority or beneficiary under whose name such capital asset is registered, their address etc.

(d) Provide details of the capital asset(s) created or acquired (including complete address and location of the capital asset).

- 10) Specify the reason(s), if the company has failed to spend two per cent of the average net profit as per section 135(5). **Not Applicable**

For Subhkam Ventures (I) Private limited



Rakesh S. Kathotia  
Managing Director  
DIN: 00165880

*Rishabh Kathotia*

Rishabh R. Kathotia  
Director  
DIN: 08314685

Place: Mumbai  
Date: 04/09/2024