RADHEY TRADE HOLDING LIMITED

DIGVIJAY PLOT, STREET NO 51,
OPPOSITE MAKHICHA NIVAS,
JAMNAGAR- 361005

CIN : L67120GJ1981PLC103918
WEBSITE : www.rholdings.org
EMAIL ID : info@rholdings.org

Date: October 06, 2018

To,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Respected Sir / Ma'am,

Sub: Submission of Annual Report for FY 2017-18

Ref: **Radhey Trade Holding Limited (Scrip Id: RADHEY; Scrip code: 539814)**

With reference to captioned subject and pursuant to Regulation 34 of SEBI (LODR) Regulation, 2015, we hereby submit the Stock Exchange 37th Annual Report of the Company.

Kindly disseminate the same on your website and oblige us.

For, **Radhey Trade Holding Limited**

P J Malde

RADHEY TRADE HOLDING LIMITED JAMNAGAR

Piyush Malde
Director
DIN 07689869

Encl:-Annual Report

RADHEY TRADE HOLDING LIMITED

37TH ANNUAL REPORT

F.Y. 2017-2018

Index

Board of Directors	
Rahul Sharma	Managing Director
Piyush Malde	Executive Director
Puja Sharma	Independent Director
Ashokkumar Shah	Independent Director
Samir Chaudhary	Independent Director
Key Managerial Personnel	
Pankaj Sharma	Chief Financial officer
Zalak Gajjar	Company Secretary & Compliance officer
Committees of Board	
Audit Committee	Puja Sharma – Chairperson Samir Chaudhary – Member Ashokkumar Shah - Member
Nomination and Remuneration Committee	Samir Chaudhary – Chairman Puja Sharma - Member Ashokkumar Shah - Member
Stakeholders' Relationship Committee	Samir Chaudhary – Chairman Puja Sharma - Member Ashokkumar Shah – Member
STATUTORY AUDITOR	**SECRETARIAL AUDITOR**
Doshi Maru & Associates 217,218, Manek Centre, P. N. Marg, Jamnagar – 361001, **Email:** doshi.maru@gmail.com **Website:** www.doshimaru.com **Firm Registration No:** 0112187W	**Zarna Solanki** 215- B, Manek Centre, P N Marg, Jamnagar-361008 **Email:** cszarna@gmail.com **Tel:** +91- 9978284612
REGISTERED OFFICE	**REGISTRAR AND SHARE TRANSFER AGENT (RTA)**
Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar 361005 **Tel :** +91-288-2661942; **Email:** info@rholdings.org; **Web:** www.rholdings.org	**M/s Niche Technologies Private Limited** D-511 Bagree Market, 71 B. R. B. Basu Road, Kolkata – 700001, **Tel:** 033-2234-3576/033-2235-7270 **Email ID**: nichetechpl@nichetechpl.com

To the Members(s)

The Board of Directors hereby submits the report of the business and operations of your Company ("the Company"), along with the audited financial statements, for the financial year ended March 31, 2018.

Financial Results: **(Amount in ₹)**

Particulars	F.Y. 2017-18	F.Y. 2016-17
Revenue from operations	1,22,59,690	-
Other Income	13,61,439	2,40,000
Total Income	**1,36,21,129**	**2,40,000**
Operating expenditure before Finance cost, depreciation and amortization	1,31,86,533.51	3,38,672
Earnings before Finance cost, depreciation and amortization (EBITDA)	4,34,595.49	(98,672)
Less: Finance costs Depreciation and amortization expense	295.50 -	216.00 -
Profit / (Loss) before tax	**4,34,299.99**	**(98,888)**
Less: Current Tax Deferred Tax	83,000 (1,54,641.11)	- -
Profit / (Loss) for the year (PAT)	**5,05,941.10**	**(98,888)**

YEAR AT A GLANCE

Financial Performance

During the year under review the revenue from operation was ₹1,22,59,690 as against Nil during the previous year 2016-17. The Company has started sale of scrap of brass and metals and due that earning from business operation has resulted. During the year the Company has also earned other income from profit of sale of gold which leads to increase in total income of ₹1,36,21,129 as against ₹2,40,000 in the previous year. This all resulted into Profit in the current year 2017-18 as compared to loss in previous financial year 2016-17.

The profit before Tax for the current year is ₹ 4,34,299.99 as against the loss before tax of ₹(98,888) in the previous year resulted into profit after tax of ₹5,05,941.10 compared to loss of previous year ₹ (98,888).

Dividend

With a view to conserve and save the resources for future prospect of the Company, your Directors regret to declare dividend for the financial year 2017-18.

Amount transferred to reserve

Your Directors do not propose transfer of any amount to the General Reserves. Full amount of net profit are carried to reserve& Surplus account of the Company.

Change in Nature of Business

During the year, your Company has not changed its business or object and continues to be in the same line of business as per main object of the Company.

SHARE CAPITAL:

Authorized Capital

The present Authorized Capital of the Company is ₹ 3,25,00,000 divided into 32,50,000 Equity Shares of ₹10/- each.

Issued, Subscribed & Paid-up Capital

The present Issue, Subscribed & Paid-up Capital of the Company is ₹3,24,00,000 divided into 32,40,000 Equity Shares of ₹10/- each.

During the year under review, there was no change took place in the authorized and paid-up share capital of the Company.

BOARD OF DIRECTORS AND KEY MANAGERIAL PERSONNEL

Constitution of Board

As on the date of this report, the Board comprises following Directors;

Name of Director	Category Cum Designation	Date of Appointment at current Term & designation	Total Directorship [2]	No. of Committee [1]		No. of Shares held as on March 31, 2018
				in which Director is Members	in which Director is Chairman	
Mr. Rahul Sharma	Managing Director	August 29, 2014	6	1	1	22,800 Equity Shares
Mr. Piyush Malde	Executive Director	September 15, 2017	1	-	-	-
Mrs. Puja Sharma	Independent Director	August 28, 2014	1	1	1	-
Mr. Ashokkumar Shah	Independent Director	March 27, 2018	2	2	1	-
Mr. Samir Chaudhary	Independent Director	April 18, 2018	1	1	1	-

[1] Committee includes Audit Committee and Shareholders' Grievances Committee across all Public Companies.

[2] Excluding LLPs, Section 8 Company & struck of Companies

The composition of Board complies with the requirements of the Companies Act, 2013 ("Act"). Further, in pursuance of Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations"), the Company is exempted from requirement of having composition of Board as per Regulation 17 of Listing Regulations.

None of the Directors of Board is a member of more than ten Committees or Chairman of more than five committees across all the Public companies in which they are Director. The necessary disclosures regarding Committee positions have been made by all the Directors.

None of the Director of the Company is serving as a Whole-Time Director in any Listed Company and is holding position of Independent Director in more than 3 Listed Company and none of the Director of the Company is holding position as Independent Director in more than 7 Listed Company. None of the Directors of the Company is disqualified for being appointed as Director as specified in Section 164 (2) of the Companies Act, 2013.

Board Meeting

The Board of the Company regularly meets to discuss various Business opportunities. Additional Board meetings are convened, as and when requires to discuss and decide on various business policies, strategies and other businesses.

During the year under review, Board of Directors of the Company met 06 times on May 22, 2017; June 10, 2017; August 09, 2017; November 10, 2017; February 06, 2018 and March 27, 2018. The details of attendance of each Director at the Board Meetings are given below;

Name of Director	Date of Original Appointment	Date of Appointment at current Designation	Date of Cessation	Number of Board Meetings Eligible to attend	Number of Board Meetings attended

Mr. Rahul Sharma	October 13, 2006	August 29, 2014	-	06	06
Mr. Piyush Malde	May 22, 2017	September 15, 2017	-	05	05
Mr. Pankaj Sharma	October 15, 2003	October 15, 2003	March 27, 2018	06	05
Mr. Kishan Choudhary	October 15, 2003	October 15, 2003	April 18, 2018	06	06
Ms. Puja Sharma	August 04, 2014	August 28, 2014	-	06	06
Mr. Asokkumar Shah	March 27, 2018	March 27, 2018	-	00	00

The gap between two consecutive meetings was not more than one hundred and twenty days as provided in section 173 of the Act.

Independent Directors

In terms of Section 149 of the Companies Act, 2013 and rules made there under, the Company has two Non-Promoter Independent Directors in line with the Companies Act, 2013. A separate meeting of Independent Directors was held on March 27, 2018 to review the performance of Non-Independent Directors and Board as whole and performance of Chairperson of the Company including assessment of quality, quantity and timeliness of flow of information between Company management and Board.

The terms and conditions of appointment of Independent Directors and Code for Independent Director are incorporated on the website of the Company at www.rholdings.org.

The Company has received necessary declaration from each independent director under Section 149 (7) of the Companies Act, 2013 that they meet the criteria of independence laid down in Section 149 (6) of the Companies Act, 2013.

Information on Directorate

During the financial year 2017-18, Mr. Pankaj Sharma, Executive Director of the Company has resigned from the Board w.e.f. March 27, 2018. Further, Company has appointed Mr. Ashokkumar Shah as Additional (Non-Executive Independent) Director of the Company w.e.f. March 27, 2018. The Board of Directors has placed their appreciation to Mr. Pankaj Sharma for his contribution to the Company for service as Executive Director on the Board.

After closure of financial year 2017-18, Mr. Kishan Choudhary, Independent Director has resigned from the Board w.e.f. April 18, 2018. The Board of Directors has placed their appreciation to Mr. Kishan Choudhary for his contribution to the Company for service as Independent Directors on the Board. The Board of Directors, in their meeting held on April 18, 2018, has appointed Mr. Samir Chaudhari as Additional (Non-Executive Independent) Director of the Company w.e.f. April 18,2018.

In accordance with the provisions of the Articles of Association and Section 152 of the Companies Act, 2013, Mr. Rahul Sharma, Managing Director of the Company retires by rotation at the ensuing annual general meeting. He, being eligible, has offered himself for re-appointment as such and seeks re-appointment. The Board of Directors recommends his appointment on the Board.

The relevant details, as required under Regulation 36 (3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), of the person seeking re-appointment and appointment as Director is annexed to the Notice convening the thirty seventh annual general meeting.

Key Managerial Personnel

In accordance with Section 203 of the Companies Act, 2013, the Company has already appointed Mr. Rahul Sharma as Managing Director of the Company and Mr.Pankaj Sharma as Chief Financial Officer.

Further, there was no change in the Key Managerial Personnel of the Company during the financial year 2017-18. However after closure of financial year 2017-18, the board of directors in their meeting held on April 18, 2018 has appointed Ms. Zalak Gajjar as Company Secretary & Compliance officer of the Company w.e.f. April 18, 2018.

Performance Evaluation

The Board of Directors has carried out an annual evaluation of its own performance, board committees and individual directors pursuant to the provisions of the Companies Act, 2013 in the following manners;

- The performance of the board was evaluated by the board, after seeking inputs from all the directors, on the basis of the criteria such as the board composition and structure, effectiveness of board processes, information and functioning etc.
- The performance of the committees was evaluated by the board after seeking inputs from the committee members on the basis of the criteria such as the composition of committees, effectiveness of committee meetings, etc.
- The board and the nomination and remuneration committee reviewed the performance of the individual directors on the basis of the criteria such as the contribution of the individual director to the board and committee meetings like preparedness on the issues to be discussed, meaningful and constructive contribution and inputs in meetings, etc.
- In addition, the chairman was also evaluated on the key aspects of his role.

Separate meeting of independent directors was held to evaluate the performance of non-independent directors, performance of the board as a whole and performance of the chairman, taking into account the views of executive directors and non-executive directors. Performance evaluation of independent directors was done by the entire board, excluding the independent director being evaluated.

Directors' Responsibility Statement

Pursuant to section 134(5) of the Companies Act, 2013, the board of directors, to the best of their knowledge and ability, confirm that:

a) In preparation of annual accounts for the year ended March 31, 2018, the applicable accounting standards have been followed and that no material departures have been made from the same;

b) The Directors had 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 and of the profit or loss of the Company for that year;

c) The Directors had 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 had prepared the annual accounts for the year ended March 31, 2018 on going concern basis.

e) The Directors had laid down the internal financial controls to be followed by the Company and that such Internal Financial Controls are adequate and were operating effectively; and

f) The Directors had devised proper systems to ensure compliance with the provisions of all applicable laws and that such systems were adequate and operating effectively.

COMMITTEE OF BOARD

The Board of Directors, in line with the requirement of the act, has formed various committees, details of which are given hereunder.

A. Audit Committee:-

Audit Committee meeting is generally held for the purpose of recommending the half yearly and yearly financial result. Additional meeting is held for the purpose of reviewing the specific item included in terms of reference of the Committee.

During the year under review, Audit Committee met 4 (Four) times viz May 22, 2017;August 09, 2017; November 10, 2017 and February 06, 2018.The composition of the Committee and the details of meetings attended by its members are given below:

Name	Designation	Number of meetings during the financial year 2017-18	
		Eligible to attend	Attended
Mr. Kishan Choudhary	Chairman	4	4
Mr. Rahul sharma	Member	4	4
Ms. Puja Sharma	Member	4	4

After closure of financial year 2017-18, due to resignation of Mr. Kishan Choudhary w.e.f. April 18, 2018 and appointment of Mr. Ashokkumar Shah and Mr. Samir Chaudhary w.e.f. March 27, 2018 and April 18, 2018 respectively, the board of directors in their meeting held on April 18, 2018 has reconstituted the Audit Committee. The current composition of the Committee is given below:

Name	Designation
Ms. Puja Sharma	Chairman
Mr. Samir Chaudhary	Member
Mr. Asokkumar Shah	Member

The Statutory Auditors of the Company are invited in the meeting of the Committee wherever requires. Chief Financial Officer of the Company is a regular invitee at the Meeting.

Recommendations of Audit Committee, wherever/whenever given, have been accepted by the Board.

Vigil Mechanism:

The Company has established a vigil mechanism and accordingly framed a Whistle Blower Policy. The policy enables the employees to report to the management instances of unethical behavior, actual or suspected fraud or violation of Company's Code of Conduct. Further the mechanism adopted by the Company encourages the Whistle Blower to report genuine concerns or grievances and provide for adequate safe guards against victimization of the Whistle Blower who avails of such mechanism and also provides for direct access to the Chairman of the Audit Committee, in exceptional cases. The functioning of vigil mechanism is reviewed by the Audit Committee from time to time. None of the Whistle blowers has been denied access to the Audit Committee of the Board. The Whistle Blower Policy of the Company is available on the website of the Company at www.rholdings.org.

B. Stakeholder's Grievance & Relationship Committee:

The Company has constituted Stakeholder's Grievance & Relationship Committee mainly to focus on the redressal of Shareholders' / Investors' Grievances, if any, like Transfer / Transmission / Demat of Shares; Loss of Share Certificates; Non-receipt of Annual Report; Dividend Warrants; etc. During the year under review, Stakeholder's Grievance & Relationship Committee met 4(Four) times viz on May 22, 2017;August 09, 2017; November 10, 2017 and February 06, 2018 The composition of the Committee and the details of meetings attended by its members are given below:

Name	Designation	Number of meetings during the financial year 2017-18	
		Eligible to attend	Attended
Mr. Kishan Choudhary	Chairman	4	4
Mr. Pankaj Sharma	Member	4	4
Ms. Puja sharma	Member	4	4

During the year due to resignation of Mr. Pankaj Sharma and appointment of Mr. Ashokkumar shah w.e.f. March 27, 2018, the board of directors of the Company in their meeting held on March 27, 2018 has reconstituted committee by replacing Mr. Ashokkumar Shah in place of Mr. Pankaj Sharma.

Further after closure of financial year 2017-18, due to resignation of Mr. Kishan Choudhary w.e.f. April 18, 2018 and appointment of Mr. Samir Chaudhary w.e.f. April 18, 2018, the board of directors in their meeting held on April 18, 2018 has reconstituted the Stakeholder's Grievance & Relationship Committee. The current composition of the Committee is given below:

Name	Designation
Mr. Samir Chaudhary	Chairman
Ms. Puja Sharma	Member
Mr. Asokkumar Shah	Member

During the year, the Company had not received any complaints from the Shareholders. There was no complaint pending as on March 31, 2018.

C. Nomination and Remuneration Committee:

The Company has formed Nomination and Remuneration committee in line with the provisions of Section 178 of the Companies Act, 2013. Nomination and Remuneration Committee meetings are generally held for identifying the persons who are qualified to become Directors and may be appointed in senior management and recommending their appointments and removal. During the year under review, Nomination and Remuneration Committee met 2 (Two) times viz on August 09, 2017 and March 27, 2018.The composition of the Committee and the details of meetings attended by its members are given below:

Name	Designation	Number of meetings during the financial year 2017-18	
		Eligible to attend	Attended
Mr. Kishan Choudhary	Chairman	2	2
Mr. Rahul sharma	Member	2	2
Ms. Puja sharma	Member	2	2

During the year due to appointment of Mr. Ashokkumar Shah w.e.f. March 27, 2018 the board of directors in their meeting held on March 27, 2018 has reconstituted the committee by replacing Mr. Ashokkumar Shah in place of Mr. Rahul Sharma.

Further after closure of financial year 2017-18, due to resignation of Mr. Kishan Choudhary w.e.f. April 18, 2018 and appointment of Mr. Samir Chaudhary w.e.f. April 18, 2018, the board of directors in their meeting held on April 18, 2018 has reconstituted the Nomination and Remuneration Committee. The current composition of the Committee is given below:

Name	Designation
Mr. Samir Chaudhary	Chairman
Ms. Puja Sharma	Member
Mr. Asokkumar Shah	Member

Nomination and Remuneration Policy:

Nomination and Remuneration Policy in the Company is designed to create a high performance culture. It enables the Company to attract motivated and retained manpower in competitive market, and to harmonize the aspirations of human resources consistent with the goals of the Company. The Company pays remuneration by way of salary, benefits, perquisites and allowances etc. to its Managing Director and the Executive Directors.

Key points of the Nomination and Remuneration Policy are;

a. Policy on Appointment of Directors, Key Managerial Personnel and Senior Management Personnel:

- The policy is formulated to identify and ascertain the integrity, qualification, expertise and experience of the person for appointment as Director, Key Managerial Personnel and Senior Management personnel and recommend to the Board for his / her appointment.

- A person should possess adequate qualification, expertise and experience for the position he/ she is considered for appointment.
- In case of appointment of Independent Director, the Committee shall satisfy itself with regard to the independent nature of the Director vis-à-vis the Company so as to enable the Board to discharge its function and duties effectively.

b. Policy on remuneration of Director, KMP and Senior Management Personnel:

The Company's remuneration policy is driven by the success and performance of Director, KMP and Senior Management Personnel vis-à-vis the Company. The Company's philosophy is to align them with adequate compensation so that the compensation is used as a strategic tool that helps us to attract, retain and motivate highly talented individuals who are committed to the core value of the Company. The Company follows mixed of fixed pay, benefits and performance based variable pay. The Company pays remuneration by way of salary, benefits, perquisites and allowance. The remuneration and sitting fees paid by the Company are within the salary scale approved by the Board and Shareholders.

The Nomination and Remuneration Policy, as adopted by the Board of Directors, is placed on the website of the Company at www.rholdings.org.

Remuneration of Directors

The details of remuneration paid during the financial year 2017-18 to Directors of the Company is provided in Form MGT-9 which is the part of this report.

PUBLIC DEPOSITS

The Company has not accepted any deposits from Shareholders and Public falling within the ambit of Section 73 of the Companies Act, 2013 and rules made there under. There were no deposits, which were claimed and remained unpaid by the Company as on March 31, 2018.

PARTICULARS OF LOANS, GUARANTEES AND INVESTMENTS

Details of Loans, Guarantees and Investments covered under the provisions of Section 186 of the Companies Act, 2013 are given in the notes to the Financial Statement for the year ended on March 31, 2018.

EXTRACT OF ANNUAL RETURN

As provided under section 92(3) of the Companies Act, 2013, the details forming part of the extract of the Annual Return in Form MGT-9 is annexed to this Report as **Annexure – A**.

TRANSACTIONS WITH RELATED PARTIES

During the year under review, there were no contracts or arrangements or transactions with related parties referred to in sub-section (1) of section 188 of the Companies Act, 2013 was executed in terms of Section 188 of the Companies Act, 2013. Further, there were no related party transactions with the Company's Promoters, Directors, Management or their relatives, which could have had a potential conflict with the interests of the Company.

All related party transactions to be entered by the Company will be in the ordinary course of business and on arm's length basis and periodically will be placed before the Audit Committee for review.

INTERNAL FINANCIAL CONTROL (IFC) SYSTEMS AND THEIR ADEQUACY

Your Company has an effective internal control system, which ensures that all the assets of the Company are safeguarded and protected against any loss from unauthorized use or disposition.

The Internal Auditors of the Company carry out review of the internal control systems and procedures. The internal audit reports are reviewed by Audit Committee.

Your Company has also put in place adequate internal financial controls with reference to the financial statements commensurate with the size and nature of operations of the Company. During the year, such controls were tested and no material discrepancy or weakness in the Company's internal controls over financial reporting was observed.

MATERIAL CHANGES AND COMMITMENT

There are no material changes and commitments, affecting the financial position of the Company, have occurred between the ends of financial year of the Company i.e. March 31, 2018 to the date of this Report.

However, during the year the Company has obtained approval of shareholders vide postal ballot dated July 26, 2017 regarding alteration in Memorandum of Association and Shift of Registered Office of the Company from the State of West Bengal to the State of Gujarat. In furtherance the Company has made application to Regional Director, Eastern Region, Kolkata for shifting of Registered office from the State of West Bengal to the State of Gujarat and the same was approved by Regional Director, Eastern Region, Kolkata vide order No RD/T/26598/S-13(4)/17/5188 dated July 27,2018.The said change has also been registered by Registrar of Companies, Gujarat, vide its letter dated September 05, 2018 and allotted new Corporate Identification Number (CIN) to the Company i.e. L67120GJ1981PLC103918.

PARTICULAR OF EMPLOYEES

The ratio of the remuneration of each whole-time director to the median of employees' remuneration as per Section 197(12) of the Companies Act, 2013, read with Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 is annexed to this Report as **Annexure – B**.

The statement containing top ten employees in terms of remuneration drawn and the particulars of employees as required under Section 197(12) of the Act read with Rule 5(2) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014, is provided in a separate annexure forming part of this report. Further, the report and the accounts are being sent to members excluding this annexure. In terms of Section 136 of the Act, the said annexure is open for inspection at the Registered Office of the Company. Any shareholder interested in obtaining a copy of the same may write to Company Secretary.

SEXUAL HARASSMENT OF WOMEN AT WORKPLACE

To foster a positive workplace environment, free from harassment of any nature, we have institutionalized the Anti-Sexual Harassment Initiative (ASHI) framework, through which we address complaints of sexual harassment at the all workplaces of the Company. Our policy assures discretion and guarantees non-retaliation to complainants. We follow a gender-neutral approach in handling complaints of sexual harassment and we are compliant with the law of the land where we operate.

During the year under review, there were no incidences of sexual harassment reported.

RISK MANAGEMENT

A well-defined risk management mechanism covering the risk mapping and trend analysis, risk exposure, potential impact and risk mitigation process is in place. The objective of the mechanism is to minimize the impact of risks identified and taking advance actions to mitigate it. The mechanism works on the principles of probability of occurrence and impact, if triggered. A detailed exercise is being carried out to identify, evaluate, monitor and manage both business and non-business risks.

ENERGY CONSERVATION, TECHNOLOGY ABSORPTION AND FOREIGN EXCHANGE EARNINGS AND OUTGO

Since the Company is not carrying on any manufacturing activities, the details of conservation of energy, technology absorption etc. as required to be given under section 134(3)(m) of the Companies Act 2013 read with the Companies (Accounts) Rules, 2014, are not applicable to the Company,.

Further, there was no foreign exchange earnings and outgo during the financial year 2017-18 (Previous Year – Nil).

CORPORATE GOVERNANCE

Your Company strives to incorporate the appropriate standards for corporate governance. However, pursuant to Regulation 15(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 the Company is not required to mandatorily comply with the provisions of certain regulations of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and therefore the Company has not provided a separate report on Corporate Governance, although few of the information are provided in this report under relevant heading.

MANAGEMENT DISCUSSION AND ANALYSIS REPORT

Management Discussion and Analysis Report for the year under review, as stipulated under Schedule V of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, is presented in a separate section forming part of this Annual Report.

STATUTORY AUDITOR AND THEIR REPORT

M/s. Doshi Maru & Associates, Chartered Accountants (Firm Registration No. 0112187W) were appointed as Statutory Auditors of your Company at the thirty sixth Annual General Meeting held on September 15, 2017, for a term till the conclusion of 41th Annual General Meeting to be held in the calendar year 2022, subject to ratification of appointment at every subsequent annual general meeting to be held after thirty sixth Annual General Meeting.

Recently, in accordance with the Companies Amendment Act, 2017, enforced on May 7, 2018 by the Ministry of Corporate Affairs, the appointment of Statutory Auditors is not required to be ratified at every Annual General Meeting and hence resolution for ratification of appointment of statutory auditor is not proposed by the Board of Directors.

The Report given by the Auditors on the financial statement of the Company is part of this Annual Report. There has been no qualification, reservation, adverse remark or disclaimer given by the Auditors in their Report.

REPORTING OF FRAUD

The Auditors of the Company have not reported any fraud as specified under Section 143(12) of the Companies Act, 2013.

INDIAN ACCOUNTING STANDARDS (IND AS) – IFRS CONVERGED STANDARDS

Your Company had adopted Ind AS with effect from April 1, 2017 pursuant to Ministry of Corporate Affairs notification dated February 16, 2015 notifying the Companies (Indian Accounting Standard) Rules, 2015. Your Company has provided Ind AS Financials for the year ended March 31, 2018 along with comparable as on March 31, 2017 and Opening Statement of Assets and Liabilities as on April 1, 2016.

SECRETARIAL AUDITOR AND THIEIR REPORT

The Company has appointed Mrs. Zarna Solanki, Practicing Company Secretaries, to conduct the secretarial audit of the Company for the financial year 2017-18, as required under Section 204 of the Companies Act, 2013 and Rules thereunder. The Secretarial Audit Report for the financial year 2017-18 is annexed to this report as an **Annexure – C**.

COMPLIANCE WITH THE PROVISIONS OF SECRETARIAL STANDARD 1 AND SECRETARIAL STANDARD 2

The applicable Secretarial Standards, i.e. SS-1 and SS-2, relating to 'Meetings of the Board of Directors' and 'General Meetings', respectively, have been duly complied by your Company.

GENERAL DISCLOSURE

Your Directors state that the Company has made disclosures in this report for the items prescribed in section 134 (3) of the Act and Rule 8 of The Companies (Accounts) Rules, 2014 and other applicable provisions of the act and listing regulations, to the extent the transactions took place on those items during the year. Your Directors further state that no disclosure or reporting is required in respect of the following items as there were no transactions on these items during the year under review or they are not applicable to the Company;

(i) Details relating to deposits covered under Chapter V of the Act;

(ii) Issue of Equity Shares with differential rights as to dividend, voting or otherwise;

(iii) Issue of shares (including sweat equity shares) to employees of the Company under any scheme save and ESOS;

(iv) There is no revision in the Board Report or Financial Statement;

(v) No significant or material orders were passed by the Regulators or Courts or Tribunals which impact the going concern status and Company's operations in future;

(vi) Information on subsidiary, associate and joint venture companies.

APPRECIATIONS AND ACKNOWLEDGEMENT

Your Directors wish to place on record their sincere appreciation for significant contributions made by the employees at all levels through their dedication, hard work and commitment during the year under review.

The Board places on record its appreciation for the support and co-operation your Company has been receiving from its suppliers, distributors, retailers, business partners and others associated with it as its trading partners. Your Company looks upon them as partners in its progress and has shared with them the rewards of growth. It will be your Company's endeavour to build and nurture strong links with the trade based on mutuality of benefits, respect for and co-operation with each other, consistent with consumer interests.

Your Directors also take this opportunity to thank all Shareholders, Clients, Vendors, Banks, Government and Regulatory Authorities and Stock Exchanges, for their continued support.

Registered office:
Digvijay Plot, Street No. 51
Opposite Makhicha Nivas
Jamnagar -361005.

For and on behalf of Board of Directors
Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918

Rahul Sharma
Managing Director
DIN 03258779

Piyush Malde
Director
DIN 07689869

Place: Jamnagar
Date: September 05, 2018

Annexure –A

FORM MGT – 9 -EXTRACT OF ANNUAL RETURN

As on the financial year ended March 31, 2018

[Pursuant to Section 92(3) of the Companies Act, 2013, and Rule 12(1) of the Companies (Management and Administration) Rules, 2014]

1) Registration and Other Details:

CIN	:	L67120GJ1981PLC103918
Registration Date	:	August 18, 1981
Name of the Company	:	Radhey Trade Holding Limited
Category / Sub-Category of the Company	:	Public Company limited by shares/ Indian Non-Government Company
Address of the Registered Office and contact details	:	Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005 ; Tel : +91-288-2661942; **Email**: info@rholdings.org; **Web**: www.rholdings.org
Whether listed Company	:	Yes
Name, address and contact details of Registrar and Transfer Agent, if any	:	Niche Technologies Pvt. Ltd 9, D-511, Bagree Market, 71 B R B Basu Road,Kolkata,West Bengal,700001; **Tel:** 91-33-22343576; **Fax:** 91-33-22156823 Email: nichetechpl@nichetechpl.com; **Web:** www.nichetechpl.com

2) Principal Business Activity of the Company: All the business activities contributing 10% or more of the total turnover of the Company shall be stated.

Name and Description of main Products / Services	NIC Code of the Product / Service	% to total turnover of the Company
Other Financial Services	649	100.00%

3) Particulars of Holding, Subsidiary and Associate Companies:

SR. No.	Name and Address of the Company	CIN/GLN	Holding/ Subsidiary / Associate	% of shares held	Applicable Section
N.A.					

4) Shareholding Pattern (Equity Share Capital Breakup as percentage of Total Equity):

I. Category-wise Shareholding:

Category of Shareholders	No. of Shares held at the beginning of year				No. of Shares held at the end of year				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
A. Promoters									
(1) Indian									
a) Individual/ HUF	-	33,950	33,950	1.05	-	33,950	33,950	1.05	-
b) Central Govt.	-	-	-	-	-	-	-	-	-
c) State Govt.	-	-	-	-	-	-	-	-	-
d) Bodies Corporate	-	--	-	-	1,50,000	-	1,50,000	4.63	4.63
e) Banks/FI	-	-	-	-	-	-	-	-	-
f) Any other	-	-	-	-	-	-	-	-	-
Sub-Total (A)(1):	**-**	**33,950**	**33,950**	**1.05**	**1,50,000**	**33,950**	**1,83,950**	**5.68**	**4.63**
(2) Foreign									
a) NRIs - Individuals	-	-	-	-	-	-	-	-	-
b) Other - Individuals	-	-	-	-	-	-	-	-	-
c) Bodies Corporate	-	-	-	-	-	-	-	-	-
d) Banks / FI	-	-	-	-	-	-	-	-	-
e) Any Other	-	-	-	-	-	-	-	-	-
Sub-Total (A)(2):	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Total Shareholding of Promoters (A) = (A)(1)+(A)(2)	**-**	**33,950**	**33,950**	**1.05**	**1,50,000**	**33,950**	**1,83,950**	**5.68**	**4.63**

Category of Shareholders	No. of Shares held at the beginning of year				No. of Shares held at the end of year				% Change during the year
	Demat	Physical	Total	% of Total Shares	Demat	Physical	Total	% of Total Shares	
B. Public Share Holding									
(1) Institutions									
a) Mutual Funds/UTI	-	-	-	-	-	-	-	-	-
b) Banks / FI	-	-	-	-	-	-	-	-	-
c) Central Govt.	-	-	-	-	-	-	-	-	-
d) State Govt.(s)	-	-	-	-	-	-	-	-	-
e) Venture Capital Funds	-	-	-	-	-	-	-	-	-
f) Insurance Company	-	-	-	-	-	-	-	-	-
g) FIIs	-	-	-	-	-	-	-	-	-
h) Foreign Venture Capital Funds	-	-	-	-	-	-	-	-	-
i) Others (specify)	-	-	-	-	-	-	-	-	-
Sub-Total (B)(1):	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
(2) Non-Institution									
a) Bodies Corporate									
i. Indian	24,00,000	-	24,00,000	74.07	15,57,166	-	15,57,166	48.06	(26.01)
ii. Overseas	-	-	-	-	-	-	-	-	-
b) Individuals									
i. Individual Shareholders holding nominal share capital up to ₹ 1 lakh	-	2,05,550	2,05,550	6.34	2,00,679	2,05,550	4,06,229	12.54	6.20
i. Individual Shareholders holding nominal share capital in excess of ₹ 1 lakh	6,00,000	-	6,00,000	18.52	10,54,576	-	10,54,576	32.55	14.03
c) Others (specify)									
NRI (Reparable/Non Reparable basis)	-	-	-	-	-	-	-	-	-
HUF	-	-	-	-	-	-	-	-	-
Clearing Members	-	-	-	-	37,579	-	37,579	1.16	1.16
Trusts	-	500	500	0.02	-	500	500	0.02	-
Sub-Total (B)(2):	**30,00,000**	**2,06,050**	**32,06,050**	**98.95**	**28,50,000**	**2,06,050**	**30,56,050**	**94.33**	**(4.63)**
Total Public Shareholding (B)=(B)(1)+(B)(2)	**30,00,000**	**2,06,050**	**32,06,050**	**98.95**	**28,50,000**	**2,06,050**	**30,56,050**	**94.33**	**(4.63)**
C. Shares held by Custodian for GDRs & ADRs	-	-	-	**-**	**-**	**-**	**-**	**-**	**-**
Grand Total (A+B+C)	**30,00,000**	**2,40,000**	**32,40,000**	**100.00**	**30,00,000**	**2,40,000**	**32,40,000**	**100.00**	**0.00**

II. Shareholding of Promoters & Promoters Group:

Name	Shareholding at beginning of year		Date wise Increase / Decrease in Shareholding			Cumulative Shareholding during the year		Shareholding at end of year		% change in shareholding during the year
	No. of Share	% of total shares of the Company	Date	Increase / Decrease in shareholding	Reason	No. of Share	% of total shares of the Company	No. of Share	% of total shares of the Company	
Pankaj Sharma	11,150	0.34	-	-	-	-	-	11,150	0.34	-
Rahul Sharma	22,800	0.70	-	-	-	-	-	22,800	0.70	-
Zeal Dealmark Private Limited	-	-	-	-	-	-	-	1,50,000	4.63	4.63

Note: No Equity Shares have been pledged or encumbered by any of the Shareholders belonging to Promoter of Promotes' Group.

III. Shareholding Pattern of top ten Shareholders (other than Directors, Promoters and Holders of GDRs and ADRs):

Name	Shareholding at beginning of year		Date wise Increase/Decrease in Shareholding*			Cumulative Shareholding during the year		Shareholding at end of year	
	No. of Share	% of total shares of the Company	Date	Increase/ Decrease in shareholding	Reason	No. of Share	% of total shares of the Company	No. of Share	% of total shares of the Company
Avni Merchants Private Limited	-	-	17-Nov-17	1,50,000	Buy	1,50,000	4.63	1,50,000	4.63
Bhagwat Marcom Private Limited	1,50,000	4.63	10-Nov-17	(1,50,000)	Sell	-	-	-	-
Burnpur Power Private Limited	1,50,000	4.63	04-Aug-17	(600)	Sell	1,49,400	4.61		
			11-Aug-17	(600)	Sell	1,48,800	4.59	1,48,800	4.59
Dream Infraproperties Private Limited	1,50,000	4.63	21-Apr-17	(1,50,000)	Sell	-	-	-	-
Faithful Cloth Merchants Private Limited	1,50,000	4.63	12-May-17	(1,50,000)	Sell	-	-	-	-
Gaganbase Vincom Private Limited	-	-	10-Nov-17	1,50,000	Buy	1,50,000	4.63	1,50,000	4.63
Glaze Construction Private Ltd.	1,50,000	4.63	-	-	-	-	-	1,50,000	4.63
Goldenleap Dealers Private Limited	1,50,000	4.63	09-Feb-18	(1,50,000)	Sell	-	-	-	-
Kaangdaji Fabricks Traders Pvt. Ltd.	1,50,000	4.63	-	-	-	-	-	1,50,000	4.63
Kamalraj Housing Pvt. Ltd.	1,50,000	4.63	17-Nov-17	(1,50,000)	Sell	-	-	-	-

***** The trading in the shares of the Company took place on almost daily basis, therefore the date wise increase/ decrease in Shareholding of top ten Shareholders are taken on the basis of weekly BenPoze.

IV. Shareholding of Directors and Key Managerial Personnel:

Name	Shareholding at beginning of year		Date wise Increase/Decrease in Shareholding*			Cumulative Shareholding during the year		Shareholding at end of year	
	No. of Share	% of total shares of the Company	Date	Increase/ Decrease in shareholding	Reason	No. of Share	% of total shares of the Company	No. of Share	% of total shares of the Company
Kishan Choudhary	400	0.01	-	-	-	-	-	400	0.01
Pankaj Sharma	11,150	0.34	-	-	-	-	-	11,150	0.34
Rahul Sharma	22,800	0.70	-	-	-	-	-	22,800	0.70

Note: No Equity Shares were held by any other directors and key managerial personnel and there are no transactions have been executed by any other Directors and Key Managerial Personnel based on weekly BenPose of the Company and confirmation given by them.

5) Indebtedness **(Amount in ₹)**

Particulars	Secured Loans excluding deposits	Unsecured Loans	Deposits	Total Indebtedness
A. Indebtedness at the beginning of the financial year				
i) Principal Amount	-	-	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total A (i+ii+iii)	-	-	-	-
B. Change in Indebtedness during the financial year	-	-	-	-

Additions	-	-	-	-
Reduction	-	-	-	-
Net Change B	-	-	-	-
C. Indebtedness at the end of the financial year	-	-	-	-
i) Principal Amount	-	-	-	-
ii) Interest due but not paid	-	-	-	-
iii) Interest accrued but not due	-	-	-	-
Total C (i+ii+iii)	-	-	-	-

6) Remuneration of Directors and Key Managerial Personnel

A) Remuneration to Managing Director, Whole-time Directors and/or Manager: The Company has not paid any remuneration to directors.

B) Remuneration to other Directors: The Company has not paid any remuneration to other directors.

C) Remuneration to Key Managerial Personnel: The Key Managerial Personnel of the Company has not withdrawn any remuneration from the Company.

7) Penalties / Punishment/ Compounding of Offences

Type	Section of the Companies Act	Brief Description	Details of Penalty/ Punishment/ Compounding fees imposed	Authority (RD/ NCLT/ Court)	Appeal made if any (give details)
A. Company					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment					
Compounding					
B. Directors					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment					
Compounding					
C. Other Officers in Default					
Penalty	N.A.	N.A.	N.A.	N.A.	N.A.
Punishment					
Compounding					

Registered office:
Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005.

For and on behalf of Board of Directors
Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918

Rahul Sharma
Managing Director
DIN 03258779

Piyush Malde
Director
DIN 07689869

Place: Jamnagar
Date: September 05, 2018

Annexure – B

PARTICULARS OF EMPLOYEES

Disclosures pertaining to remuneration and other details as required under Section 197(12) of the Companies Act, 2013 read with Rules made there under.

A. Information as per Rule 5(1) of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014:

a) The ratio of remuneration of each director to the median remuneration of employees for the financial year:

The Company has not paid any remuneration to any of the director so that it is not possible to find out median for the same.

b) The Percentage increase in remuneration of each director, Chief Financial Officer, Chief Executive Officer, Company Secretary or Manager, if any, in the financial year:

As the company has not paid any remuneration to Director, Hence the percentage calculation is not applicable in this case. There has been no increase in remuneration of any director, chief financial officer and Company Secretary of the Company over previous year.

c) The percentage increase in the median remuneration of employees in the financial year:

As the Company has not paid any remuneration to directors it is not possible to calculate the percentage of the same.

d) The number of permanent employees on the rolls of the Company: 03 Employees

e) Average percentile increase already made in the salaries of employees other than the managerial personnel in the last financial year and its comparison with the percentile increase in the managerial remuneration and justification thereof and point out if there are any exceptional circumstances for increase in the managerial remuneration:

The Average 123% approx increase was made in salary of employees whereas remuneration of executive directors was remained unchanged.

The Board of Directors of the Company affirmed that remuneration of all the Key Managerial Personnel of the Company are as per the Remuneration Policy of the Company.

Registered office:
Digvijay Plot, Street No. 51
Opposite Makhicha Nivas
Jamnagar -361005.

For and on behalf of Board of Directors
Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918

Rahul Sharma
Managing Director
DIN 03258779

Piyush Malde
Director
DIN 07689869

Place: Jamnagar
Date: September 05, 2018

Annexure – C

SECRETARIAL AUDIT REPORT

Form No. MR-3

For the financial year ended March 31, 2018

[Pursuant to section 204(1) of the Companies Act, 2013 and Rule 9 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014]

To,
The Members,
Radhey Trade Holding Limited
D25, Strand Road 6th Floor,
Room-607, Marshal House,
Kolkata 700001

I have conducted the secretarial audit of the compliance of applicable statutory provisions and the adherence to good corporate practices by **Radhey Trade Holding Limited** (hereinafter called "the Company"). Secretarial Audit was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing my opinion thereon.

Based on my verification of the Company's books, papers, minutes books, forms and returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents and authorized representatives during the conduct of secretarial audit, I hereby report that, in my opinion, the Company has, during the audit period covering the financial year ended on March 31, 2018, complied with the statutory provisions listed hereunder and also that the Company has proper Board-processes and compliance-mechanism in place to the extent, in the manner and subject to the reporting made hereinafter.

I have examined the books, papers, minutes books, forms and returns filed and other records maintained by the Company for the financial year ended on March 31, 2018 according to the provisions of:

i. The Companies Act, 2013 ('the Act') and the rules made there under as applicable;
ii. Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Foreign Direct Investment;
iii. The Depositories Act, 1996 and the Regulations and Bye-laws framed there under;
iv. The Securities Contracts (Regulation) Act, 1956 ('SCRA') and the rules made there under;
v. The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 ('SEBI Act'):-
   a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
   b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
   c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009;
   d) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("the Listing Regulations");
vi. Secretarial Standards issued by The Institute of Company Secretaries of India w.r.t. meetings of the Board of Director (SS-1) and General Meetings (SS-2);

During the period under review the Company has complied with the provisions of the Act, Rules made there under, Regulations, guidelines etc. mentioned above.

I have relied on the representation made by the Company and its Officers for systems and mechanism formed by the Company for compliances under other applicable Acts, Laws and Regulations as applicable to the Company as given in **Annexure A**.

During the Period under review, provisions of the following Acts, Rules, Regulations, and Standards are not applicable to the Company,

i. Foreign Exchange Management Act, 1999 and the rules and regulations made there under to the extent of Overseas Direct Investment and External Commercial Borrowings; and
ii. The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993; -
iii. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
iv. The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
v. The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;
vi. The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

I further report that -

The Board of Directors of the Company is duly constituted with proper balance of Executive Directors, Non-Executive Directors, Independent Directors and Woman Director. The changes in the composition of the Board of Directors that took place during the period under review were carried out in compliance with the provisions of the Companies Act, 2013 and rules made thereunder.

Adequate notice is given to all Directors to schedule the Board Meetings, agenda and detailed notes on agenda were sent in advance, and a system exists for seeking and obtaining further information and clarifications on the agenda items before the meeting and for meaningful participation at the meeting.

All decisions of the Board and Committees were carried with requisite majority.

I further report that -

There are adequate systems and processes in the Company commensurate with the size and operations of the Company to monitor and ensure compliance with applicable laws, rules, regulations and guidelines.

I further report that:-

During the audit period, the Company has applied for shifting its registered office to Regional Director, Eastern Region, Kolkata from the State of West Bengal to the State of Gujarat. Further the Company has also received approval from Regional Director, Eastern Region, Kolkata vide order No RD/T/26598/S-13(4)/17/5188 dated July 27,2018 regarding shifting of its registered office and the Company is awaiting for approval of Registrar of Company, Ahmedabad.

Place: Jamnagar
Date: September 4, 2018

Zarna Solanki
ACS No. : 31389
C P No. : 13732

Note: This Report is to be read with my letter of even date which is annexed as Annexure B and Annexure A and Annexure B forms an integral part of this report.

Annexure A

List of major Sector Specific Acts applicable to the Company

1. Gujarat Stamp Act, 1958
2. Equal Remuneration Act, 1976 and Rules, 1976
3. Minimum Wages Act,1948 & Rules there under
4. Workmen's Compensation Act,1923 & Rules there under
5. Payment of Bonus Act,1965 & the Payment of Bonus Rules,1975
6. Payment of Wages Act,1936 & Rules there under
7. Payment of Subsistence Allowance Act & Rules
8. Industrial Establishment (National & Festival Holidays) Act
9. Transfer of Property Act,1882
10. The Indian Contract Act, 1872
11. Negotiable Instrument Act,1881
12. Sales of Goods Act,1930
13. Arbitration & Conciliation Act,1996
14. Bombay Stamp Act, 1908 (as applicable to Gujarat State)
15. Intellectual Property Law-Trade Marks
16. Registration Act, 1908
17. Various Central and State Indirect Taxation Laws like, Finance Act, 1994 read with Service Tax Rules, 1994

Annexure B

To,
The Members,
Radhey Trade Holding Limited
D25, Strand Road 6th Floor,
Room-607, Marshal House,
Kolkata 700001

My report of even date is to be read along with this letter.

1. Maintenance of secretarial records is the responsibility of the management of the Company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of secretarial records. The verification was done on test basis, on the records and documents provided by the Management of the Company, to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices followed by me provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
4. The compliance of the provision of corporate and other applicable laws, rules, regulations, standards is the responsibility of management. My examination was limited to verification of procedures on test basis.
5. Wherever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.

6. The Secretarial Audit report is neither an assurance as to the future viability of the Company nor the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place: Jamnagar
Date: September 4, 2018

Zarna Solanki
ACS No. : 31389
C P No. : 13732

The Management's views on the Company's Performance and outlook are discussed below:

Economic Outlook:

Global growth has eased but remains robust and is projected to reach 3.1 percent in 2018. It is expected to edge down over the next two years as global slack dissipates, trade and investment moderate, and financing conditions tighten. Growth in advanced economies is forecast to decelerate toward potential rates as monetary policy is normalized and the effects of U.S. fiscal stimulus wane. In emerging market and developing economies (EMDEs), growth in commodity importers will remain strong, while the rebound in commodity exporters is projected to mature over the next two years. For the first time since 2010, the long-term (10-year-ahead) consensus forecast for global growth appears to have stabilized. Although this development could signal that the legacies of the global financial crisis are fading, past experience cautions that long-term forecasts are often overly optimistic. While well below levels expected a decade ago, these forecasts also remain above potential growth estimates. Moreover, risks to the outlook are tilted to the downside. They include disorderly financial market movements, escalating trade protectionism, and heightened geopolitical tensions. EMDE policymakers should rebuild monetary and fiscal policy buffers and be prepared for rising global interest rates and possible episodes of financial market turbulence. In the longer run, adverse structural forces continue to overshadow long-term growth prospects implying that EMDEs need to boost potential growth by promoting competitiveness, adaptability to technological change, and trade openness. These steps will help mitigate an expected growth slowdown over the next decade, especially if long term growth forecasts fall once again short of expectations.

Rapid Growth among the major emerging markets over the past 20 years has boosted global demand for commodities. The seven largest emerging markets (EM7) accounted for almost all of the increase in global consumption of metals and two-thirds of the increase in energy consumption over this period. As these economies mature and shift towards less commodity-intensive activities, their demand for most commodities may level off. While global energy consumption growth may remain broadly steady, global metals and foods demand growth could slow by one-third over the next decade. This would dampen global commodity prices. For emerging market and developing economies that depend on raw materials for government and export revenues, these prospects reinforce the need for economic diversification and the strengthening of policy frameworks.

Indian Economy

A normalization in cash conditions following the demonetization of late 2016 and the fading of disruptions from last year's launch of the Goods and Services Tax should facilitate the economic recovery in FY 2018. Nonetheless, risks of fiscal slippage in the run-up to elections next year, concerns over India's banking sector, increasing global trade tensions and higher oil prices all cloud prospects. Our panel expects GDP growth of 7.3% in FY 2018, which is unchanged from last month's estimate, and 7.5% in FY 2019.

Industry Structure and Developments

This development is testimony to the reputation that Company has built for being a well-run, well-managed Company with strong fundamentals, high level of governance and ethics, motivated and capable employees led by a high calibre leadership team, a customer first orientation, attractive product portfolio marketed through a balanced distribution network and strong brand equity.

The Company has qualitative employees which have contributed in overall output of the company. However, it is also true that we have not seen concomitant credit growth, which remained at its lowest level in many years. Thanks to lack of overall demand, capital investments by the corporate sector continued to remain sluggish. Despite favorable liquidity conditions and lower interest rates, banks have found it difficult to increase lending as they have struggled with large non-performing assets (NPAs) from their loan books. Moreover, a second consecutive year of poor monsoons, weakening currency and falling exports due to deflationary conditions in many importing countries dampened economic sentiments.

INDUSTRY STRUCTURE AND DEVELOPMENTS

The bullion reserve of a country is the indicator of the amount of wealth a country possesses. Bullion is defined as a bulk quantity of precious metals consisting of gold, silver and others that can be assessed by weight and cast as a lump. Bullion is valued by its purity and mass rather than its face value which is applicable in the case of money. India Bullion Market is a recognizable index that highlights the economic growth of the nation.

Strength	Weakness	Outlook / Threat
• A well-defined and scalable organization structure • Experienced and stable management team • The Company's biggest strength is its trained manpower and team back up by promoter Director. Which enables Smooth Conduct of operation	• Limited geographical coverage. • Dependent upon growth in stock market and overall fiscal growth.	• Economic slowdown • Increasing competition • Capital Market Slowdown
Our Strategy		
❖ Expansion of existing activities	❖ Financial Management/Advisory Services	❖ Differentiated Services

Risk and Concerns

The very nature of the Company's business makes it susceptible to various kinds of risks. The Company encounters market risk, credit risk and operational risks in its daily business operations. The Company has framed a comprehensive Risk Management Manual which inter-alia lays down detailed process and policies in the various facets of risk management function. The risk management review framework provides complete oversight to various risk management practices and process. The framework and assessment remains dynamic and aligns with the continuing requirements and demands of the market. The Company has also implemented surveillance mechanism to deal with various trades related risks and adopted a surveillance policy in line with the regulatory requirements.

Internal Financial Control Systems and their adequacy:

Internal Control system and adequacy Internal Control measures and systems are established to ensure the correctness of the transactions and safe guarding of the assets. Thus, internal control is an integral component of risk management. The Internal control checks and internal audit programmers adopted by our Company plays an important role in the risk management feedback loop, in which the information generated in the internal control process is reported back to the Board and Management. The internal control systems are modified continuously to meet the dynamic change. Further the Audit Committee of the Board of Directors reviews the internal audit reports and the adequacy and effectiveness of internal controls.

Financial Performance and Review of Operations: **(Amount in ₹)**

Particulars	F.Y. 2017-18	F.Y. 2016-17
Revenue from operations	1,22,59,690	-
Other Income	13,61,439	2,40,000
Total Income	**1,36,21,129**	**2,40,000**
Operating expenditure before Finance cost, depreciation and amortization	1,31,86,533.51	3,38,672
Earnings before Finance cost, depreciation and amortization (EBITDA)	4,34,595.49	(98,672)

Less: Finance costs Depreciation and amortization expense	295.50 -	216.00 -
Profit / (Loss) before tax	**4,34,299.99**	**(98,888)**
Less: Current Tax Deferred Tax	83,000 (1,54,641.11)	- -
Profit / (Loss) for the year (PAT)	**5,05,941.10**	**(98,888)**

HUMAN RESOURCE

Equipping the Company with an engaged and productive workforce is essential to our success. We look for commitment, skills and innovative approach in people. In assessing capability, we consider technical skills and knowledge that have been acquired through experience and practice, along with mental processing ability, social process skills and their application.

We continue to invest in developing a pipeline of future talent and nurture them. As part of this process, we provide development and training opportunities to our workforce, which motivates and encourages them to grow in their work.

Total 3 employees were employed in the Company. The Company has been maintaining cordial and healthy Industrial Relations, which has helped to a great extent in achieving the upper growth.

CAUTIONARY STATEMENT

This report contains statements that may be "forward looking" including, but without limitation, statements relating to the implementation of strategic initiatives, and other statements relating to Company's future business developments and economic performance. While these forward looking statements indicate our assessment and future expectations concerning the development of our business, a number of risks, uncertainties and other unknown factors could cause actual developments and results to differ materially from our expectations. These factors include, but are not limited to, general market, macroeconomic, governmental and regulatory trends, movements in currency exchange and interest rates, competitive pressures, technological developments, changes in the financial conditions of third parties dealing with us, legislative developments, and other key factors that could affect our business and financial performance. Company undertakes no obligation to publicly revise any forward looking statements to reflect future/likely events or circumstances.

Independent Auditor's Report

To

The Members of
RADHEY TRADE HOLDING LIMITED

Report on the Standalone Financial Statements:

We have audited the accompanying FinancialStatements of **Radhey Trade Holding Limited** ("the Company"), which comprise the Balance Sheet as at March 31, 2018 the Statement of Profit and Loss, including statement of other Comprehensive income, Cash Flow Statement and Statement of changes in Equity for the year ended March 31, 2018, and a summary of significant accounting policies and other explanatory information for the year ended as on 31st March, 2018.

Management's Responsibility for the Standalone Financial Statements:

The Company's Board of Directors is responsible for the matters stated in Section 134(5) of the Companies Act, 2013 ("the Act") with respect to the preparation and presentation of these Standalone Financial Statements that give a true and fair view of the financial position, financial performance and cash flow of the Company in accordance with the accounting principles generally accepted in India, including the accounting standards specified under Section 133 of the Act, as applicable. This responsibility also includes maintenance of adequate accounting records in accordance with the provisions of the Act for safeguarding the assets of the company and for preventing and detecting frauds and other irregularities, selection and application of appropriate accounting policies, making judgments and estimates that are responsible and prudent, and design, implementation and maintenance of adequate internal financial controls, that were operating effectively for ensuring the accuracy and completeness of the accounting records, relevant to the preparation and presentation of the financial statements that give a true and fair view and are free from material misstatement, whether due to fraud or error.

Auditors' Responsibility:

Our responsibility is to express an opinion on these standalone financial statements based on our audit.

We have taken into account the provisions of the Act, the accounting and auditing standards and matters which are required to be included in the audit report under the provisions of the Act and the Rules made thereunder.

We conducted our audit in accordance with the Standards on Auditing specified under Section 143(10) of the Act. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal financial control relevant to the Company's preparation of the financial statements that give a true and fair view in order to design audit procedures that are appropriate in the circumstances. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of the accounting estimates made by company's directors as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the standalone financial statements.

Opinion:

In our opinion and to the best of our information and according to the explanations given to us, the aforesaid standalone financial statements give the information required by the Act in the manner so required and give a true and fair view in conformity with the accounting principles generally accepted in India; of the state of affairs of the company as at 31st March

2018 and its profit and loss including other comprehensive income,its cash flow statement and changes in Equity for the year ended on that date.

Report on Other Legal and Regulatory Requirements:

1. As required by the Companies (Auditor's Report) Order, 2016 ("theOrder") issued by the Central Government of India in terms of sub-section (11) of section 143 of the Act, we give in the **"AnnexureA"** a statement on the matters specified in paragraphs 3 and 4 of the Order.

2. As required by section 143(3) of the Act, we report that:

   a) we have sought and obtained all the information and explanations which to the best of our knowledge and belief were necessary for the purpose of our audit;
   b) in our opinion proper books of account as required by law have been kept by the Company so far as appears from our examination of those books
   c) the Balance Sheet, the Statement of Profit and Loss including other comprehensive income, Cash Flow Statement and Statement of Change in Equity dealt with by this Report are in agreement with the books ofaccount.
   d) in our opinion, the aforesaid standalone financial statements comply with the Accounting Standards specified under Section 133 of the Act, read with relevant rule issued thereunder.
   e) on the basis of written representations received from the directors as on March 31, 2018, taken on record by the Board of Directors, none of the directors is disqualified as on March 31, 2018, from being appointed as a director in terms of Section 164(2) of the Act.
   f) with respect to the adequacy of the internal financial controls over financial reporting of the Company and the operating effectiveness of such controls, refer to our separate Report in **"Annexure B"** and

   g) with respect to the other matters to be included in the Auditor's Report in accordance with Rule 11 of the Companies (Audit and Auditors) Rules,2014, in our opinion and to the best of our information and according to the explanations given to us:

      i. The Company does not have any pending litigations which would impact its financial position.

      ii. The Company did not have any long-term contract including derivative contracts for which there were any material foreseeable losses; hence the company need not make any provision.

      iii. There has been no delay in transferring amounts or no amount is required to be transferred to the Investor Education and Protection Fund by the Company during the year ended March 31, 2018.

For, Doshi Maru & Associates.
Chartered Accountants

Sarvesh A Gohil
Partner
Membership No.: 135782
FRN: 0112187W
Date:25/05/2018
Place: Jamnagar

ANNEXURE "A" TO AUDITOR'S REPORT

The Annexure referred to in Independent Auditors' Report to the members of the company on the standalone financial statements for the year ended 31st March, 2018, we report that:

(i) In respect of Its Fixed Assets:

a) Based on our scrutiny of the Company's Book of Account and other records and according to the information and explanations received by us from the management, we are of the opinion that the question of commenting on maintenance of proper records of fixed assets and physical verification of fixed assets does not arise since the company had no fixed assets as on 31st March, 2018 nor at any time during the financial year ended on 31st March, 2018.

b) According to the information and explanation given to us, the company does not own any immovable property. Hence paragraph 3(i)(c) of the Order is not applicable.

(ii) There is no physical inventory at the end of the year. Therefore, the requirement of clause (ii) of paragraph 3 of the said Order is not applicable to the company.

(iii) The Company has not granted any loans, secured or unsecured, to companies, firms, Limited Liability Partnerships or other parties covered in the register maintained under Section 189of the Act. Thus, paragraph 3(iii) of the order is not applicable to the company.

(iv) In our opinion and according to the information and explanations given to us, the Company has not made any loans, guarantees and investments covered under the provisions of section 185 and 186 of the Companies Act, 2013.

(v) The Company has not accepted any deposits from the public and hence the directives issued by the Reserve Bank of India and the provisions of Sections 73 to 76 or any other relevant provisions of the Act and the Companies (Acceptance of Deposit) Rules, 2014 with regard to the deposits accepted from the public are not applicable.

(vi) As informed to us, the maintenance of Cost Records has not been specified by the Central Government under sub-section (1) of Section 148 of the Act, in respect of the activities carried on by the company.

(vii) In respect of Statutory Dues:

a. According to the information and explanations given to us and on the basis of our examination of the records of the Company, amounts deducted/accrued in the books of account in respect of undisputed statutory dues including provident fund, employees state insurance, income tax, sales-tax, value added tax, duty of customs, duty of excise, service tax, cess and other material statutory dues as applicable have been regularly deposited during the year by the company with the appropriate authorities.

According to the information and explanations given to us, no undisputed dues were in arrears as at 31st March, 2018 for a period of more than six months from the date they become payable.

b. According to the information and explanations given to us, there are no dues of Income tax, sales-tax, duty of excise, duty of customs, service tax and value added tax which have not been deposited with the appropriate on account of any dispute.

(viii) The company does not have any default in repayment of dues of loans or borrowings from any financial institution, banks, government or debenture holders during the year.

(ix) During the year the company did not raise any money by way of initial public offer or further public offer (including debt instruments) and term loans. Accordingly, paragraph 3 (ix) of the order is not applicable.

(x) According to the information and explanation given to us, no material fraud by the company or on the company by its officers or employees has been noticed or reported during the course of our audit.

(xi) Based upon the audit procedures performed and the information and explanations given by the management, the managerial remuneration has been paid or provided in accordance with the requisite approvals mandated by the provisions of section 197 read with Schedule V to the Companies Act.

(xii) In our opinion and according to the information and explanations given to us, the Company is not a Nidhi Company. Accordingly, paragraph 3(xii) of the order is not applicable.

According to the information and explanations given to us and based on our examination of the records of the company, transactions with the related parties are in compliance with sections 177 and 188 of the Act where applicable and details of such transactions have been disclosed in the financial statements as required by the applicable accounting standards.

(xiii) According to the information and explanations given to us and based on our examination of the records of the company, the Company has not made any preferential allotment or private placement of shares or fully or partly convertible debentures during the year.

(xiv) According to the information and explanation given to us and based on our examination of the records of the Company, the company has not entered into any non-cash transactions with directors or persons connected with him. Accordingly, the paragraph 3(xv) of the order is not applicable.

(xv) The company is not required to be registered under section 45-IA of the Reserve Bank of India Act, 1934.

For, Doshi Maru & Associates.
Chartered Accountants

Sarvesh A Gohil
Partner
Membership No.: 135782
FRN: 0112187W
Date: 25/05/2018
Place: Jamnagar

ANNEXURE “B” TO AUDITOR’S REPORT

Report on the Internal Financial Controls under Clause (i) of Sub-section 3 of Section 143 of the Companies Act, 2013 ('the Act')

We have audited the internal financial controls over financial reporting of **Radhey Trade Holding Limited** (“the Company”) as of 31st March, 2018 in conjunction with our audit of the financial statements of the Company for the year ended on that date.

Management’s Responsibility for Internal Financial Controls

The Company’s management is responsible for establishing and maintaining internal financial controls based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note on Audit of Internal Financial Controls Over Financial Reporting (the 'Guidance Note') issued by the Institute of Chartered Accountants of India (the 'ICAI'). These responsibilities include the design, implementation and maintenance of adequate internal financial controls that were operating effectively for ensuring the orderly and efficient conduct of its business, including adherence to company’s policies, the safeguarding of its assets, the prevention and detection of frauds and errors, the accuracy and completeness of the accounting records, and the timely preparation of reliable financial information, as required under the Companies Act, 2013.

Auditors’ Responsibility

Our responsibility is to express an opinion on the Company's internal financial controls over financial reporting based on our audit. We conducted our audit in accordance with the Guidance Note and the Standards on Auditing, issued by the ICAI and deemed to be prescribed under section 143(10) of the Companies Act, 2013, to the extent applicable to an audit of internal financial controls, both applicable to an audit of Internal Financial Controls and, both issued by the ICAI. Those Standards and the Guidance Note require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether adequate internal financial controls over financial reporting was established and maintained and if such controls operated effectively in all material respects.

Our audit involves performing procedures to obtain audit evidence about the adequacy of the internal financial controls system over financial reporting and their operating effectiveness. Our audit of internal financial controls over financial reporting included obtaining an understanding of internal financial controls over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. The procedures selected depend on the auditor’s judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion on the Company’s internal financial controls system over financial reporting.

Meaning of Internal Financial Controls over Financial Reporting

A company's internal financial control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal financial control over financial reporting includes those policies and procedures that:

(1) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company;

(2) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made only in accordance with authorizations of management and directors of the company; and

(3) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Inherent Limitations of Internal Financial Controls Over Financial Reporting

Because of the inherent limitations of internal financial controls over financial reporting, including the possibility of collusion or improper management override of controls, material misstatements due to error or fraud may occur and not be detected. Also, projections of any evaluation of the internal financial controls over financial reporting to future periods are subject to the risk that the internal financial control over financial reporting may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, the Company has, in all material respects, an adequate internal financial controls system over financial reporting and such internal financial controls over financial reporting were operating effectively as at 31st March 2018 based on the internal control over financial reporting criteria established by the Company considering the essential components of internal control stated in the Guidance Note issued by the ICAI.

For, Doshi Maru & Associates.
Chartered Accountants

Sarvesh A Gohil
Partner
Membership No.:135782
FRN: 0112187W
Date:25/05/2018
Place: Jamnagar

RADHEY TRADE HOLDING LIMITED

BALANCE SHEET AS AT 31ST MARCH, 2018

Particulars	Note No.	As At 31st March 2018	As At 31st March 2017	As At 1st April 2016
A. ASSETS				
1 Non-Current Assets				
(a) Property, Plant & Equipment		-	-	-
(b) Capital Work -In-Progress		-	-	-
(c) Investment Properties		-	-	-
(d) Goodwill		-	-	-
(e) Other Intangible Assets		-	-	-
(f) Intangible Assets under development		-	-	-
(g) Biological Assets other than Bearer plants		-	-	-
(h) Financial Assets		-	-	
i. Investments	2	-	28,695,971.00	28,721,540.00
ii. Trade Receivables		-	-	-
iii. Loan	3	2,200,000.00	2,200,000.00	2,200,000.00
iv. Other Financial Assets		-	-	-
(i) Deferred tax Assets (net)		154,641.11	-	-
(k) Other Non-Currnet Assets		-	-	-
Total Non-Current Assets		2,354,641.11	30,895,971.00	30,921,540.00
2 Current assets				
(a) Inventories		-	-	-
(b) Financial Assets		-	-	-
i. Investments		-	-	-
ii. Trade Receivables	4	8,966,435.00	-	100,000.00
iii. Cash and cash Equivalents	5	420,822.91	608,703.00	582,022.00
iv. Bank balance other than(iii) above		-	-	-
v. Loan		-	-	-
vi. Others	6	28,892,410.00	-	-
(c) Income/Current tax assets (net)		-	-	-
(d) Other Current Assets		-	-	-
Total Current Assets		38,279,667.91	608,703.00	682,022.00
Total Assets(1+2)		40,634,309.02	31,504,674.00	31,603,562.00
1 Equity				
(a) Equity Share Capital	7	32,400,000.00	32,400,000.00	32,400,000.00
(b) Other equity	8	(399,385.18)	(905,326.00)	(806,438.00)
Total Equity		32,000,614.82	31,494,674.00	31,593,562.00
2 Liabilities				
Non Current Liabilities				
(a) Financial liabilities				
i. Borrowings		-	-	-
ii. Trade Payables		-	-	-
iii. Other Financial Liabilities		-	-	-
(b) Provision		-	-	-
(b) Deferred tax liabilities (net)		-	-	-
(c) Other Non-Current liabilities		-	-	-
Total Non-Current Liabilities		-	-	-

3	**Current Liabilities**					
	(a) Financial liabilities					
	i. Borrowings		-	-	-
	i.Trade (Financial) payable	9	8,171,741.00	-	-
	ii. Other Financial liabilities		-	-	-
	(b)Provisions		-	-	-
	(c)Income/Current tax liabilities (net)		83,000.00	-	-
	(d) Other Current Liabilities	10	378,953.20	10,000.00	10,000.00
	Total Current Liabilities		8,633,694.20	10,000.00	10,000.00
	Total Liabilities		8,633,694.20	10,000.00	10,000.00
	Total Equity and Liabilities		**40,634,309.02**	**31,504,674.00**	**31,603,562.00**
	Significant Accounting Policies	1	0.00	-	-
	See Accompanying Notes to Financial Statements	17			

As per our report on even date attached
For DOSHI MARU & ASSOCIATES
Chartered Accountants

Sarvesh A Gohil
Partner
M.No. 135782
F.R.N 0112187W
Place: Jamnagar
Date: 25/05/2018

FOR RADHEY TRADE HOLDING LIMITED

Rahul Sharma	**Piyush Malde**
Managing Director	**Director**
Din :03258779	**Din :07689869**
Pankaj Sharma	**Zalak Gajjar**
CFO	**Company Secretary**

RADHEY TRADE HOLDING LIMITED
PROFIT AND LOSS STATEMENT FOR THE YEAR ENDED 31st MARCH,2018

	Particulars	Notes	For the year ended 31 March 2018	For the year ended 31 March 2017
	Income			
I.	Revenue from operations	11	12,259,690.00	-
II.	Other income	12	1,361,439.00	240,000.00
III.	**Total Revenue (I + II)**		**13,621,129.00**	**240,000.00**
IV.	**Expenses:**			
	Cost of materials consumed		-	-
	Purchases of Stock-in-Trade	13	12,009,950.00	-
	Changes in inventories of finished goods work-in-progress and Stock-in-Trade		-	-
	Employee benefits expense	14	392,809.00	175,850.00
	Finance costs	15	295.50	216.00
	Depreciation and amortization expense		-	-
	Other expenses	16	783,774.51	162,822.00
V.	**Total Expenses**		**13,186,829.01**	**338,888.00**
VI.	**Profit/(Loss) before Exceptional items & Tax (III-V)**		434,299.99	(98,888.00)
VII	**Exceptional Items**		-	-
VIII	**Profit/(Loss) Before tax**		**434,299.99**	**(98,888.00)**
IX	**Tax expense:**			
	(1) Current tax		83,000.00	-
	(2) Deferred tax		(154,641.11)	-
X	**Profit/ (Loss) for the year**		**505,941.10**	**(98,888.00)**
	Other Comprehensive Income			
	A.(i) Items that will not reclassified to profit or loss		-	-
	(ii) Income tax relating to items that will not be reclassified to profit or loss		-	-
	B.(i) Items that will be reclassified to profit or loss		-	-
	(ii) income tax relating to items that will be reclassified to profit or loss		-	-
	Total of Comprehensive income		-	-
XI	**Profit/(Loss) After Other Comprehensive Income**		**505,941.10**	**(98,888.00)**
XII	**Earnings per equity share:(Continuing operation)**			
	(1) Basic(in Rs.)		0.16	-
	(2) Diluted		0.16	-
	Significant Accounting Policies			
	See Accompanying Notes to Financial Statements			

As per our report on even date attached
For DOSHI MARU & ASSOCIATES
Chartered Accountants

FOR RADHEY TRADE HOLDING LIMITED

Rahul Sharma
Managing Director
Din :03258779

Piyush Malde
Director
Din :07689869

Sarvesh A Gohil
Partner
M.No. 135782
F.R.N 0112187W
Place: Jamnagar
Date: 25/05/2018

Pankaj Sharma
CFO

Zalak Gajjar
Company Secretary

RADHEY TRADE HOLDING LIMITED
STATEMENT OF CHANGES IN EQUITYFOR THE YEAR ENDED 31st MARCH,2018

Particulars	As at 31st March, 2018	As at 31st March, 2017
	Amt. Rs.	Amt. Rs.
A -EQUITY SHARE CAPITAL		
Outstanding at the Beginning of the Year	32,400,000.00	32,400,000.00
Issued during the Year	-	-
Total	**32,400,000.00**	**32,400,000.00**

Particulars	Balance at the beginning of reporting Period i.e 01st April,2017	Profit for the Year	Transfer to/ from Retained Earnings	Balance at the End of Reporting Period i.e. 31st March,2018
	Amt. Rs.	Amt. Rs.	Amt. Rs.	Amt. Rs.
B -OTHER EQUITY				
As At 31ST MARCH, 2018				
SHARE APPLICATION MONEY PENDING ALLOTMENT	-	-	-	-
RESERVE AND SURPLUS				
Retained Earnings	(905,326.00)	505,941.10	-	**(399,384.90)**
OTHER COMPREHENSIVE INCOME	-	-	-	-
Total	**(905,326.00)**	**505,941.10**	**-**	**(399,384.90)**

Particulars	Balance at the beginning of reporting Period i.e 01st April,2016	Profit for the Year	Transfer to/ from Retained Earnings	Balance at the End of Reporting Period i.e. 31st March,2017
	Amt. Rs.	Amt. Rs.	Amt. Rs.	Amt. Rs.
As At 31ST MARCH, 2017				
SHARE APPLICATION MONEY PENDING ALLOTMENT	-	-	-	-
RESERVE AND SURPLUS				
Retained Earnings	(806,438.00)	(98,888.00)	-	**(905,326.00)**
OTHER COMPREHENSIVE INCOME	-	-	-	-
Total	**(806,438.00)**	**(98,888.00)**	**-**	**(905,326.00)**

For DOSHI MARU & ASSOCIATES
Chartered Accountants

FOR RADHEY TRADE HOLDING LIMITED

Rahul Sharma — Managing Directo — Din :03258779
Piyush Malde — Director — Din :07689869

Sarvesh A Gohil
Partner
M.No. 135782
F.R.N 0112187W
Place: Jamnagar

Pankaj Sharma — CFO
Zalak Gajjar — Company Secretary

Date: 25/05/2018

RADHEY TRADE HOLDING LIMITED

CASH FLOW STATEMENT FOR THE YEAR ENDED 31ST MARCH,2018

Sr. No.	Particular	For the year ended 31 March 2018		For the year ended 31 March 2017	
	CASHFLOW STATEMENT	**Amount (In Rs.)**	**Amount (In Rs.)**	**Amount (In Rs.)**	**Amount (In Rs.)**
A.	**Cash flow from Operating Activities**				
	Net Profit Before tax as per Statement of Profit & Loss		434,299.99		(98,888.00)
	Adjustments for :				
	Interest Income	(240,000.00)		(240,000.00)	
	Finance Cost	295.50	(239,704.50)	216.00	- 239,784.00
	Operating Profit before working capital changes		194,595.49		- 338,672.00
	Changes in Working Capital				
	Trade Receivable	(8,966,435.00)		100,000.00	
	Other Financial Assets	(28,892,410.00)		-	
	Trade Payables	8,171,741.00		0.00	
	Other Current Liabilites	368,873.42		-	
			(29,318,230.58)		100,000.00
	Less : Income Tax Provision		-		-
	Net Cash Flow from Operating Activities (A)		(29,123,635.09)		- 238,672.00
B.	**Cash flow from investing Activities**				
	Change in Non Current Investment	28,695,971.00		25,569.00	
	Interest Income	240,000.00		240,000.00	
			28,935,971.00		265,569.00
	Net Cash Flow from Investing Activities (B)		28,935,971.00		265,569.00

C.	**Cash Flow From Financing Activities**			
	Interest Paid	(216.00)		(216.00)
			(216.00)	(216.00)
	Net Cash Flow from Financing Activities (C)		(216.00)	(216.00)
D.	**Net (Decrease)/ Increase in Cash & Cash Equivalents (A+B+C)**		(187,880.09)	26,681.00
	Opening Cash & Cash Equivalents		608,703.00	582,022.00
F.	**Cash and cash equivalents at the end of the period**		**420,822.91**	**608,703.00**
G.	**Cash And Cash Equivalents Comprise :**			
	Cash		199,753.00	569,428.00
	Bank Balance :			
	Current Account		221,069.91	39,275.00
	Deposit Account			
	Total		**420,822.91**	**608,703.00**

For DOSHI MARU & ASSOCIATES
Chartered Accountants

FOR RADHEY TRADE HOLDING LIMITED

Sarvesh A Gohil
Partner
M.No. 135782
F.R.N 0112187W
Place: Jamnagar
Date: 25/05/2018

Rahul Sharma
Managing Director
Din :03258779

Piyush Malde
Director
Din :07689869

Pankaj Sharma
CFO

Zalak Gajjar
Company Secretary

Note : 2 - Non-current Investments

Particulars	As at March 31, 2018			As at March 31, 2017			As at April 1, 2016		
	Quoted	Unquoted	Total	Quoted	Unquoted	Total	Quoted	Unquoted	Total
Investment in Equity Instruments									
Srijan Dealers Private Limited			-		848,500.00	848,500.00	-	1,398,500.00	1,398,500.00
(900 Shares of sarjan Dealers Private Limited)									
Other Investments :-									
Investment in Bullions					27,847,471.00	27,847,471.00	-	27,323,040.00	27,323,040.00
(Investment Valued at Cost)									
Total	-	-	-	-	28,695,971.00	28,695,971.00	-	28,721,540.00	28,721,540.00
Aggregate Market Value of Quoted Shares		-	-			-		-	-
Aggregate Value of Unquoted Shares	-	-	-		28,695,971.00	28,695,971.00	-	28,721,540.00	28,721,540.00

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 3-NON CURRENT LOANS			
Secured, considered good	-	-	-
(a) Security Deposits	-	-	-
(c) Loan by Pramoter/ Directors/Associates Company/Subsidary Company/Group Company	-	-	-
(d) Other			
	-	-	-
Unsecured, considered good	-	-	-
(a) Security Deposits			
(c) Loan by Pramoter/ Directors/Associates Company/Subsidary Company/Group Company			
(d) Other	2,200,000.00	2,200,000.00	2,200,000.00
	2,200,000.00	2,200,000.00	2,200,000.00
Total	**2,200,000.00**	**2,200,000.00**	**2,200,000.00**

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 4 - CURRENT TRADE RECEIVABLES			
(a) Secured, Considered good	-	-	-
(b) Unsecured, Considered good	8,966,435.00	-	100,000.00
(c) Doubtful	-	-	-
Less: Allowance for bad and doubtful debts	-	-	-
	8,966,435.00	-	100,000.00
Futher Classified			
(A) Allowance for doubtful Debts	-	-	-
(B) Debts Due by Directors or other officers or Group company/Associates Company/Subsidary Company	-	-	-
Total	**8,966,435.00**	**-**	**100,000.00**

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 05 -CASH AND BANK BALANCES			
Balance with Banks	221,069.91	39,275.00	4,226.00
Cheques, drafts on hand			
Cash on hand	199,753.00	569,428.00	577,796.00
Others(margin money/security against the borrowings/ guarantees/ other commitments)	-	-	-
Total	**420,822.91**	**608,703.00**	**582,022.00**

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 6 - OTHER CURRENT FINANCIAL ASSETS			
Accrued Interest	-	-	-
Cash Margin Money	-	-	-
Other Receivable	28,892,410.00	-	-
Total	**28,892,410.00**	**-**	**-**

NOTE : 7 - SHARE CAPITAL	As at 31st March 2018		As at 31st March 2017		As at 01st April 2016	
	Units	Amt. Rs.	Units	Amt. Rs.	Units	Amt. Rs.
Authorised Share Capital						
Equity Shares of ` 10 each	3,250,000.00	32,500,000.00	3,250,000.00	32,500,000.00	3,250,000.00	32,500,000.00
Issued						
Equity Shares of ` 10 each	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00
Subscribed & Paid up						
Equity Shares of ` 5 each fully paid	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00
Total	**3,240,000.00**	**32,400,000.00**	**3,240,000.00**	**32,400,000.00**	**3,240,000.00**	**32,400,000.00**

RECONCILIATION OF NUMBER OF SHARES	As at 31st March 2018 No. of Shares		As at 31st March 2017 No. of Shares		As at 01st April 2016 No. of Shares	
Shares outstanding at the beginning of the year	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00
Shares Issued during the year	-	-	-	-	-	-
Shares bought back during the year	-	-	-	-	-	-
Shares outstanding at the end of the year	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00	3,240,000.00	32,400,000.00

Details of Shares held by shareholders holding more than 5% of the aggregate shares in the co.	As at 31st March 2018		As at 31st March 2017		As at 01st April 2016	
	Units	% Held	Units	% Held	Units	% Held
Starwinf Fashion Trading Limited	300,000.00	9.26	-	-	-	-

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 01st April, 2016
NOTE : 8 - OTHER EQUITY			
Securities Premium Reserve			
As per last Balance Sheet			
Add : On issue of shares			
Less: Calls in arrears - by others			
Retained Earnings			
As per last Balance Sheet	(905,326.00)	(806,438.00)	129,520.00
Less : Ind As Adjustment			
Add: Profit for the year	505,941.10	- 98,888.00	(935,958.00)
Less: Divison Closed & Written Off			
Less: Income Tax Writtern Off	-		
	(399,385.18)	- 905,326.00	(806,438.00)
Other Comprehensive Income (OCI)			
As per last Balance Sheet			
Add: Movement in OCI (Net) during the year			
	-		-
Total	**(399,385.18)**	**(905,326.00)**	**(806,438.00)**

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 9 - CURRENT TRADE PAYABLE			
Micro, Small and Medium Enterprises			
Others	8,171,741.00	-	-
Total	**8,171,741.00**	**-**	**-**

Particulars	As at 31st March, 2018	As at 31st March, 2017	As at 1st April, 2016
NOTE : 10 - OTHER CURRENT LIABILITIES			
(a) Revenue received in advance	-	-	-
(b) Statutory Remittance			
CGST Payable	4,476.60		
SGST Payable	4,476.60		
(c) Others			
Audit Fee Payable	130,000.00	10,000.00	10,000.00
Salary Payable	240,000.00	-	-
Total	**378,953.20**	**10,000.00**	**10,000.00**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 11 - REVENUE FROM OPERATIONS		
Sale of Products	12,259,690.00	-
Sale of Services	-	-
Other Operating Revenues	-	-
Total	**12,259,690.00**	**-**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 11(a) - PARTICULARS OF SALE OF PRODUCTS & SERVICES		
Sales of Products	12,259,690.00	**-**
Total	**12,259,690.00**	**-**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 12 - OTHER INCOME		
Interest Income		
Other Interest Income	240,000.00	240,000.00
Dividend Income	-	-
Other Non-operating revenues	-	-
Profit on Sale of Gold	1,121,439.00	-
Total	**1,361,439.00**	**240,000.00**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 13 - PURCHASE OF STOCK-IN-TRADE		
Brass Scrap Purchase	12,009,950.00	-
Total	**12,009,950.00**	**-**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 14 - EMPLOYEE BENEFITS EXPENSES		
(a) Salaries and Wages	379,000.00	175,850.00
(b) Contributions to Provident Fund & Other Fund		
(c) Staff welfare expenses	13,809.00	-
(d) Provision for Gratutity	-	-
(e) Termination Benefits	-	-
Total	**392,809.00**	**175,850.00**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 15 - FINANCE COST		
(a) Interest expense :-		
(i) Borrowings	-	-
(ii) Others - TDS	-	
(b) Other borrowing costs	295.50	216.00
Total	**295.50**	**216.00**

Particulars	For the Year ended 31st March, 2018	For the Year ended 31st March, 2017
NOTE : 16 - OTHER EXPENSES		
Selling & Distrubution Expenses		
Advertisement exp	14,750.00	13,600.00
Establishment Expenses		
Payment to Auditor	130,000.00	26,500.00
Legal & Professional Fees	577,379.91	56,084.00
Printing & Stationery Exp	10,857.00	14,362.00
Telephone & Mobile Exp	12,425.00	13,200.00
Mis Expenses.	38,362.60	39,076.00
Total	**783,774.51**	**162,822.00**

RADHEY TRADE HOLDING LIMITED
For Year ended on 31st March 2018

NOTES FORMING PART OF THE FINANCIAL STATEMENTS

Company's Overview:

Radhey Trade Holding Limited ("The Company") was incorporated on 18/08/1981 vide Certificate of incorporation No. L67120WB1981PLC033991 under the Companies Act, 1956. The Company is engaged in the business of trading in sarees having a wide variety of sarees from plain to designer and cotton silk and also engaged in other activities like investing in gold and bullions.

Note: -1 Significant accounting policies:

(A) Statement of Compliance

These financial statements have been prepared in accordance with Indian Accounting Standards ("Ind AS") notified under the Companies (Indian Accounting Standards) Rules, 2015 and Companies (Indian Accounting Standards) Amendment Rules, 2016 as applicable. Up to the year ended March 31, 2017, the Company prepared its financial statements in accordance with the requirements of previous GAAP, which includes Standards notified under the Companies (Accounting Standards) Rules, 2006. These are the company's first Ind AS financial statements. The date of transition to Ind AS is April 1st, 2016. Refer Note 17 for the details of first-time adoption exemptions availed by the Company. In accordance with Ind AS 101 First-time Adoption of Indian Accounting Standard, the Company has presented a reconciliation under Accounting Standards notified under the Companies (Accounting Standards) Rules, 2006 ("Previous GAAP" or "Indian GAAP") to Ind AS.

(B) Basis of Preparation

These financial statements are prepared on historical cost basis, except for certain financial instruments which are measured at fair values as explained in the accounting policies below.

(C) Finance Cost

Borrowing costs include exchange differences arising from foreign currency borrowings to the extent they are regarded as an adjustment to the interest cost. Borrowing costs that are directly attributable to the acquisition or construction of qualifying assets are capitalised as part of the cost of such assets. A qualifying asset is one that necessarily takes substantial period of time to get ready for its intended use.

Interest income earned on the temporary investment of specific borrowings pending their expenditure on qualifying assets is deducted from the borrowing costs eligible for capitalisation.

All other borrowing costs are charged to the Statement of Profit and Loss for the period for which they are incurred.

(D) Inventories

Inventory cost includes cost of purchase and other costs incurred in bringing the inventories to their present location and condition, Cost is determined on weighted average basis.

(E) Revenue recognition

Revenue from sales of products are recognized when all the revenue recognition criteria as per Ind AS 18 are met.

Revenue is recognized when the significant risk and rewards of ownership have been transferred to the buyer, recovery of the consideration is probable, the associated costs and possible return of goods can be estimated reliably, there is no continuing effective control over, or managerial involvement with, the goods, and the amount of revenue can be measured reliably. Timing of transfer of risk and rewards varies depending on the individual term of sale.

Revenue from Operation is measured at Fair Value of the consideration received or receivable, taking into account contractually define terms of payment and excluding taxes or duties collected on behalf of the government.

Interest Income – Interest income from Financial Asset is recognised using effective interest method.

Dividend Income – Dividend income is recognised when the Company's right to receive the amount has been established

(F) Foreign Currency Transactions

i) Functional currency

The functional currency of the company is the Indian rupee. These financial statements are presented in Indian rupees.

ii) Initial Recognition

On initial recognition, all foreign currency transactions are recorded by applying to the foreign currency amount the exchange rate between the functional currency and the foreign currency at the date of the transaction.

iii) Subsequent Recognition

As at the reporting date, non-monetary items which are carried in terms of historical cost denominated in a foreign currency are reported using the exchange rate at the date of the transaction. All non-monetary items which are carried at fair value or other similar valuation denominated in a foreign currency are reported using the exchange rates that existed when the values were determined.

All monetary assets and liabilities in foreign currency are restated at the end of accounting period. Exchange differences on restatement of all other monetary items are recognised in the Statement of Profit and Loss.

(G) Income Tax

Tax expense for the period, comprising current tax and deferred tax, are included in the determination of the net profit or loss for the period.

I. Current tax: -

Current tax is measured at the amount expected to be paid to the tax authorities in accordance with the taxation laws prevailing in the respective jurisdictions.

Current tax assets and current tax liabilities are offset when there is a legally enforceable right to set off the recognised amounts and there is an intention to settle the asset and the liability on a net basis.

II. Deferred tax:-

Deferred tax is recognized using the balance sheet approach. Deferred tax assets and liabilities are recognized for deductible and taxable temporary differences arising between the tax base of assets and liabilities and their carrying amount in financial statements.

Deferred tax asset is recognized to the extent that it is probable that taxable profit will be available against which such deferred tax assets can be realized. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the deferred income tax asset to be utilized.

(H) Provisions and Contingencies

Provisions:

Provisions are recognised when there is a present obligation (legal or constructive) as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and there is a reliable estimate of the amount of the obligation. Provisions are measured at the best estimate of the expenditure required to settle the present obligation at the Balance sheet date and are discounted to its present value as appropriate.

Contingent Liabilities:

Contingent liabilities are disclosed when there is a possible obligation arising from past events, the existence of which will be confirmed only by the occurrence or nonoccurrence of one or more uncertain future events not wholly within the control of the company or a present obligation that arises from past events where it is either not probable that an outflow of resources will be required to settle or a reliable estimate of the amount cannot be made, is termed as a contingent liability.

(I) Leases:

Leases under which the Company assumes substantially all the risks and rewards of ownership are classified as finance leases. When acquired, such assets are capitalized at fair value or present value of the minimum lease payments at the inception of the lease, whichever is lower.

Lease payments under operating leases are recognised as an expense on a straight line basis in the statement of profit and loss over the lease term except where the lease payments are structured to increase in line with expected general inflation.

(J) Financial Instruments:

Financial assets and financial liabilities are recognised when a company becomes a party to the contractual provisions of the instruments.

Financial assets and financial liabilities are initially measured at fair value. Transaction costs that are directly attributable to the acquisition or issue of financial assets and financial liabilities (other than financial assets and financial liabilities at fair value through profit or loss) are added to or deducted from the fair value of the financial assets or financial liabilities, as appropriate, on initial recognition. Transaction costs directly attributable to the acquisition of financial assets or financial liabilities at fair value through profit or loss are recognised immediately in profit or loss.

(K) Segment Information

Information reported to the Chief Operating Decision Maker (CODM) for the purposes of resource allocation and assessment of segment performance focuses there is mainly single segment.

17. First Time Adoption of Ind As

These are Company's first financial statements prepared in accordance with Ind AS. The accounting policies have been applied in preparing these financial statements for the year ended March 31, 2018 comparative financial statements for the year ended March 31, 2017 and opening Ind AS balance sheet at April 01, 2016 (the date of transition). In preparing its opening balance sheet, the Company has adjusted the amounts reported previously in financial statements prepared in accordance with the Previous GAAP. An explanation of how the transition from previous GAAP to Ind AS has affected the Company's financial position, financial performance and cash flows is set out in the following tables and notes: -

(A) Reconciliation between previous GAAP and Ind AS:

(1) Equity Reconciliation: -

Equity Reconciliation :-		
Particulars	**As AT 31.03.17**	**As At 01.04.16**
Equiity Under Previous GAAP	3,33,05,326.00	3,32,06,468.00
Add/Less : Ind As Adjustment	-	-
Equity under Ind As	**3,33,05,326.00**	**3,32,06,468.00**

(2) Net Profit Reconciliation: -

Net Income Reconciliation: -	
Particulars	**For the Year Ended 31.03.17**
Net Income as under Previous GAAP	(98,888.00)
Add/Less : Ind As Adjustment	
Net Income as Per Ind As	**(98,888.00)**

Notes to Reconciliation of transaction to Indian as to Previous GAAP:

The Company had measured long term investments at cost and current investment at lower cost and fair value in previous GAAP. Under Indian AS, the company has elected to measure Long Term Equity investment at fair Value through Profit and Loss.

18. Foreign Currency Transactions: -

Expenditure in Foreign Currency: - Nil

Earnings in Foreign Currency: - Nil

19. Deferred tax Assets and Liabilities are as under: -
Components of which are as under: -

(Rs. In Lacs)

Particulars	**Amount (Rs.) 31-3-2018**	**Amount (Rs.) 31-3-2017**
Deferred Tax		
Block of assets (Depreciation)	(6.01)	-
Net Differed Tax Liability/(Asset)	1.55	-

20. Earnings Per Share

Particulars	Year Ended on 31st March, 2018 (Rs.)	Year Ended on 31st March, 2017 (Rs.)
Profit / (Loss) after tax attributable to Equity Shareholders (A)	5,05,941.10	(98,888.00)
Weighted Number of Equity Share outstanding During the year (B) (In Nos.)	32,40,000	32,40,000
Basic Earnings Per Share for each Share of Rs.10/- (A) / (B)	0.16	-

Notice is hereby given that the Thirty Seventh (37th) Annual General Meeting (AGM) of Radhey Trade Holding Limited ("the Company") will be held on Saturday, September 29, 2018 at 11.30 A.M. at the registered office of the Company situated at Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005, to transact the following businesses;

Ordinary Businesses

1. To receive, consider and adopt the Audited Financial Statements of the Company for the financial year ended on March 31, 2018, together with the Reports of Board of Directors and the Auditor thereon.
2. To appoint a Director in place of Mr. Rahul Sharma (DIN 03258779), who retires by rotation and being eligible, seeks re-appointment.

Explanation: Based on the terms of appointment, executive directors are subject to retirement by rotation. Mr. Rahul sharma (DIN 03258779), who was appointed as Managing Director for the current term, and is the longest-serving member on the Board, retires by rotation and, being eligible, seeks re-appointment.

To the extent that Mr. Rahul Sharma (DIN 03258779) is required to retire by rotation, he would need to be reappointed as such. Therefore, shareholders are requested to consider and if thought fit, to pass the following resolution as an ordinary resolution:

"RESOLVED THAT, pursuant to the provisions of Section 152 and other applicable provisions of the Companies Act, 2013, the approval of the members of the Company be, and is hereby accorded to the reappointment of Mr. Rahul Sharma (DIN 03258779) as such, to the extent that he is required to retire by rotation."

Special Businesses

3. **Appointment of Mr. Ashokkumar Shah (DIN 03387128) as Non-Executive Independent Director of the Company.**

To consider and if thought fit, to pass with or without modification, following resolution as an **Ordinary resolution:**

"RESOLVED THAT, pursuant to Section 149, 152, Schedule IV and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder, Mr. Ashokkumar Shah (DIN 03387128), who was appointed as an Additional (Non-Executive Independent) Director of the Company by the Board of Directors with effect from March 27, 2018 and who holds office till the date of this AGM, in terms of Section 161 of the Companies Act, 2013, and in respect of whom the Company has received a notice in writing from a member under Section 160 of the Companies Act, 2013 signifying his intention to propose Mr. Ashokkumar Shah (DIN 03387128) as a candidate for the office of an independent director of the Company, be and is hereby appointed as an Non-Executive Independent Director of the Company for a period up to March 26, 2023, not liable to retire by rotation."

4. **Appointment of Mr. Samir Chaudhary (DIN 08099141) as Non-Executive Independent Director of the Company.**

To consider and if thought fit, to pass with or without modification, following resolution as an **Ordinary resolution:**

"RESOLVED THAT, pursuant to Section 149, 152, Schedule IV and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder, Mr. Samir Chaudhary (DIN 08099141), who was appointed as an Additional (Non-Executive Independent) Director of the Company by the Board of Directors with effect from April 18, 2018 and who holds office till the date of this AGM, in terms of Section 161 of the Companies Act, 2013, and in respect of whom the Company has received a notice in writing from a member under Section 160 of the Companies Act, 2013 signifying his intention to propose Mr. Samir Chaudhary (DIN 08099141) as a candidate for the office of an independent director of the Company, be and is hereby appointed as an Non-Executive Independent Director of the Company for a period up to April 17, 2023, not liable to retire by rotation.”

Registered office:
Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005

For and on behalf of Board of Directors
Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918

Place: Jamnagar
Date: September 05, 2018

Rahul sharma
Managing Director
DIN 03258779

Notes:

1. The relative Explanatory Statements pursuant to Section 102 of the Companies Act, 2013 ("Act") setting out material facts concerning the businesses under Item Nos. 3 to 4 of the Notice, is annexed hereto. The relevant details, as required under Regulation 36(3) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("SEBI Listing Regulations"), of the person seeking re-appointment/appointment as Director under Item Nos. 2 to 4 of the Notice are also annexed.
2. **A Member entitled to attend and vote at the AGM is entitled to appoint a proxy to attend and vote instead of himself/herself and the proxy need not be a Member of the Company.**

   A person can act as proxy on behalf of Members not exceeding 50 (fifty) and holding in the aggregate not more than 10% of the total share capital of the Company. In case a proxy is proposed to be appointed by a Member holding more than 10% of the total share capital of the Company carrying voting rights, then such proxy shall not act as a proxy for any other person or shareholder.

   The instrument appointing the proxy, duly completed, must be deposited at the Company's registered office not less than 48 hours before the commencement of the meeting (on or before September 27, 2018, 11:30 a.m.). A proxy form for the AGM is enclosed. Proxies submitted on behalf of limited companies, societies etc., must be supported by appropriate resolutions / authority, as applicable.

   During the period beginning 24 hours before the time fixed for the commencement of Meeting and ending with the conclusion of the Meeting, a Member would be entitled to inspect the proxies lodged at any time during the business hours of the company, provided that not less than three days of notice in writing is given to the Company.
3. Members/Proxies should bring their Attendance slip duly signed and completed for attending the AGM. The signature of the attendance slip should match with the signature(s) registered with the Company. Members holding shares in dematerialized form are requested to bring their Client ID and DP ID numbers for identification.
4. Corporate members, intending to send their authorized representatives to attend the AGM, are requested to send a certified copy of the board resolution authorizing their representative to attend and vote on their behalf at the AGM.
5. In case of joint holders attending the AGM together, only holder whose name appearing first will be entitled to vote.
6. The Register of Members and Share Transfer Books of the Company will be closed from Saturday, September 22, 2018 to Saturday, September 29, 2018 (both days inclusive) for the purpose of 37th (Thirty Seventh) AGM and same will be re-opened from Sunday, September 30, 2018 onwards.
7. The route map showing directions to reach the venue of the 37th (Thirty Seventh) AGM is provided at the end of this Notice.
8. To prevent fraudulent transactions, members are advised to exercise due diligence and notify the Company of any change in address or demise of any member as soon as possible. Members are also advised not to leave their demat account(s) dormant for long period of time. Periodic statement of holdings should be obtained from the concerned Depository Participant and holdings should be verified.
9. The Notice of the AGM along with the Annual Report 2017-18 is being sent by electronic mode to those Members whose e-mail addresses are registered with the Company / Depositories, unless any Member has requested for a physical copy of the same. For Members who have not registered their e-mail addresses, physical copies are being sent by the permitted mode. Members may note that this Notice and the Annual Report 2017-18 will also be available on the Company's website viz. www.rholdings.org.
10. Members seeking any information with regard to the accounts are requested to write to the Company atleast before Seven days, so as to enable the Management to keep the information ready at the Annual General Meeting.

11. The Register of Directors and Key Managerial Personnel and their shareholding, maintained under Section 170 of the Companies Act, 2013, will be available for inspection by the members at the Annual General Meeting.

12. The Register of Contracts or Arrangements in which Directors are interested, maintained under Section 189 of the Companies Act, 2013, will be available for inspection by the members at the Annual General Meeting.

13. All documents specifically referred to in this Notice are opened for inspection at the registered office of the Company between 02.00 p.m. and 04.00 p.m. on all working days (except Saturdays, Sundays and Holidays) up to the date of AGM.

14. In compliance with the provisions of Section 108 of the Act and the Rules framed thereunder, as amended from time to time, and Regulation 44 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Members are provided with the facility to cast their vote electronically, through the remote e-voting services provided by Central Depository Services (India) Limited (CDSL), on all the resolutions set forth in this Notice. The instructions for e-voting are given herein below. Resolution(s) passed by Members through remote e-voting and voting at the AGM is/are deemed to have been passed as if they have been passed at the AGM.

15. The remote e-voting period commences on Wednesday, September 26, 2018 (09:00 a.m.) and ends on Friday, September 28, 2018 (05:00 p.m.). During this period members of the Company, holding shares either in physical form or in dematerialized form, as on the cut-off date being the day of Saturday, September 22, 2018, may cast their vote by remote e-voting. The remote e-voting module shall be disabled by CDSL for voting thereafter. Once the vote on a resolution is cast by the member, the member shall not be allowed to change it subsequently.

16. A person, whose name is recorded in the register of members or in the register of beneficial owners maintained by the depositories as on the cut-off date only shall be entitled to avail the facility of remote e-voting as well as voting at the AGM through ballot paper. The voting rights of members shall be in proportion to their shares of the paid up equity share capital of the Company as on the cut-off date of Saturday, September 22, 2018.

17. The facility for voting through polling paper shall be made available at the AGM and the Members attending the AGM and holding shares either in physical form or in dematerialized form, as on the cut-off date being the day of Saturday, September 22, 2018 and who have not already cast their vote by remote e-voting, shall be able to exercise their right to vote at the AGM.

18. The Members who have cast their vote by remote e-voting prior to the AGM may also attend the AGM but shall not be entitled to cast their vote again.

19. The Board of Directors has appointed Zarna Solanki & Associates(Zarna Solanki Membership No 31389 COP 13732), Practicing Company Secretary as the Scrutinizer to scrutinize the remote e-voting process and voting at the AGM and in a fair and transparent manner.

20. The Chairman shall, at the AGM, at the end of discussion on the resolutions on which voting is to be held, allow voting with the assistance of scrutinizer, by use of polling paper for all those members who are present at the AGM but have not cast their votes by availing the remote e-voting facility.

21. The Scrutinizer shall, after the conclusion of voting at the AGM, first count the votes cast at the AGM and thereafter unblock the votes cast through remote e-voting in the presence of at least two witnesses not in the employment of the Company and shall make, not later than 48 hours of the conclusion of the AGM, a consolidated scrutinizer’s report of the total votes cast in favor or against, if any, to the Chairman or a person authorized by him in writing, who shall countersign the same and declare the result of the voting forthwith.

The Results declared along with the report of the Scrutinizer shall be placed on the website of the Company www.rholdings.org and on the website of CDSL immediately after the declaration of result by the Chairman or a person authorized by him in writing. The results shall also be immediately forwarded to the BSE Limited, Mumbai.

22. **The instructions for e-voting are as under:**

Step 1. Open your web browser during the voting period and log on to the e-voting website: www.evotingindia.com

Step 2. Now click on “Shareholders” to cast your votes.

Step 3. Now, fill up the following details in the appropriate boxes:

User-ID:

a. **For CDSL**: 16 digits beneficiary ID

b. **For NSDL**: 8 Character DP ID followed by 8 Digits Client ID

c. Members holding shares in physical form should enter the Folio Number registered with the Company.

Step 4. Next, enter the Image Verification as displayed and Click on Login.

If you are holding shares in demat form and had logged on to then your existing password is to be used.

Step 5. If you are a first time user follow the steps given below:

For members holding shares in demat form and physical form:

PAN Enter your 10 digit alpha-numeric PAN issued by Income Tax Department

Members who have not updated their PAN with the Company/Depository Participant are requested to use the first two letters of their name and the 8 digits of the sequence number in the PAN Field.

In case the sequence number is less than 8 digits enter the applicable number of 0's before the number after the first two characters of the name in CAPITAL letters. e.g. If your name is RameshKumar with sequence number 1 then enter RA00000001 in the PAN field.

DOB# Enter the Date of Birth as recorded in dd/mm/yyyy format.

Dividend Bank Details# Enter the Dividend Bank Details as recorded in your demat Bank account or the Company records for the said folio.

If the details are not recorded with the Depository or Company, please enter the number of Shares held by you in the bank account column.

Please enter the DOB or dividend bank details in order to login.

Step 6. After entering these details appropriately, click on “SUBMIT” tab.

Step 7. Members holding shares in physical form will then directly reach the Company selection screen. However, first time user holding shares in demat form will now reach 'Password Creation' menu wherein they are required to mandatorily enter their login password in the new password field. Kindly note that this password can also be used by the Demat holders for voting for resolution of any other Company on which they are eligible to vote, provided that the Company opts for e-Voting through CDSL platform. It is strongly recommended not to share your password with any other person and take utmost care to keep your password confidential.

Step 8. If Demat account holder has forgotten the changed password then enter the user ID and the image verification code and click on Forgot Password and enter the details as prompted by the System.

Step 9. For members holding shares in physical form, the details can be used only for remote e-voting on the resolutions contained in this Notice.

Step 10. Click on EVSN of the Company to vote.

Step 11. On the voting page, you will see Resolution Description and against the same, the option “YES/NO” for voting. Select the relevant option as desired YES or NO and click to submit.

Step 12. Click on the resolution file link if you wish to view the entire Notice.

Step 13. After selecting the resolution, you have decided to vote on, click on “SUBMIT”. A confirmation box will be displayed. If you wish to confirm your vote, click on “OK”, else to change your vote, click on “CANCEL” and accordingly modify your vote. Once you “CONFIRM” your vote on the resolution, you will not be allowed to modify your vote.

Step 14. You can also take print out of the voting done by you by clicking on “Click here to print” option on the Voting page.

Step 15. Instructions for Non – Individual Members and Custodians:

- Non-Individual Members (i.e. other than Individuals, HUF, NRI, etc.) and Custodian are required to log on to www.evotingindia.com and register themselves as Corporates.
- A scanned copy of the Registration Form bearing the stamp and sign of the entity should be emailed to helpdesk.evoting@cdslindia.com
- After receiving the login details, a compliance user should be created using the admin login and password. The compliance user would be able to link the account(s) for which they wish to vote on.
- The list of accounts should be mailed to helpdesk.evoting@cdslindia.com and on approval of the accounts, they would be able to cast their vote.
- A scan copy of the Board Resolution and Power of Attorney ("POA") which they have issued in favour of the Custodian, if any, should be uploaded in PDF format in the system for the Scrutinizer to verify the same.

Shareholders can also cast their vote using CDSL's Mobile app M-voting available for android based mobiles. The M-voting app can be downloaded from Google Play Store. Please follow the instructions as prompted by the mobile app while voting on your mobile.

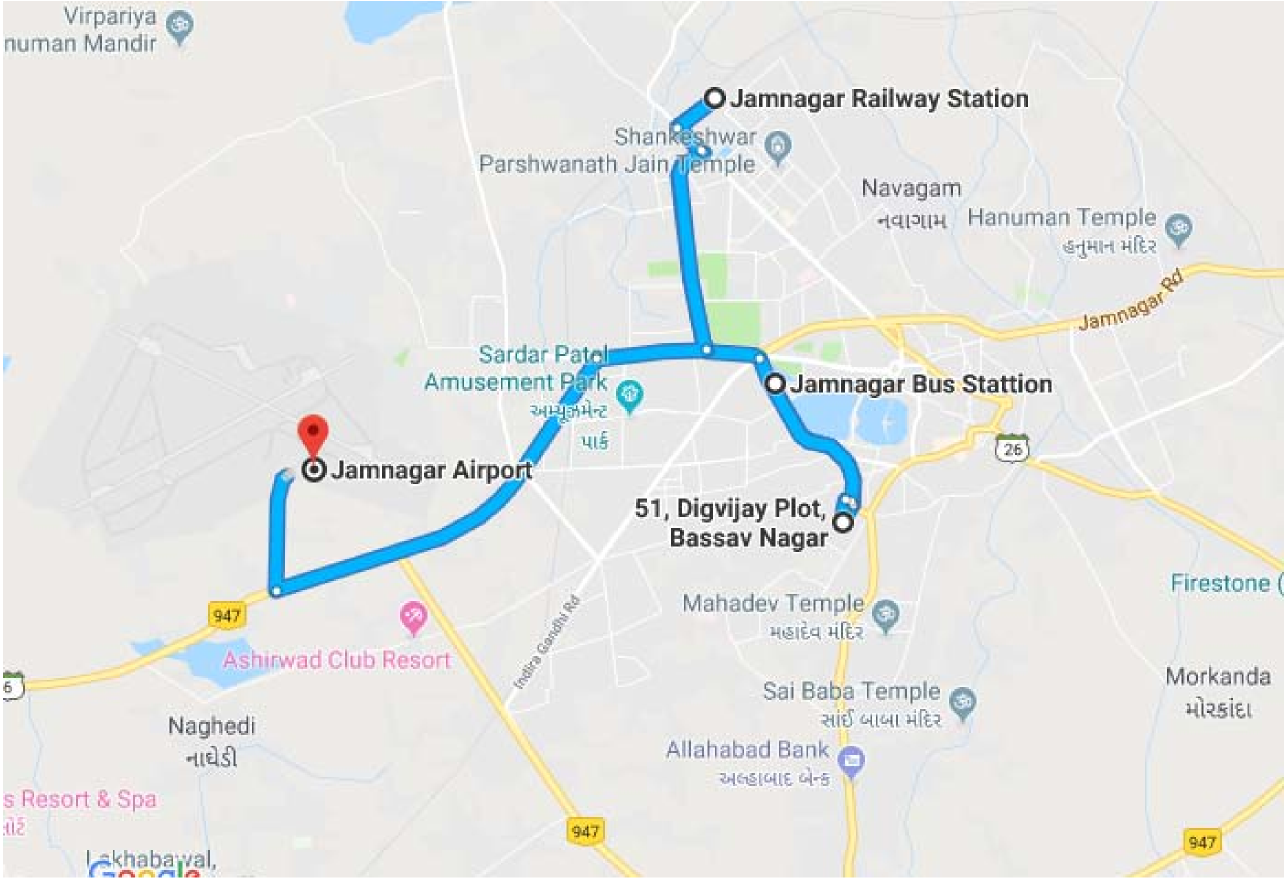
The results declared along with the Scrutinizer's Report shall be placed on the Company's website www.rholdings.org and on the website of CDSL i.e www.cdslindia.com within three days of the passing of the Resolutions at the 37th Annual General Meeting of the Company and shall also be communicated to the Stock Exchanges where the shares of the Company are listed.

In case you have any queries or issues regarding e-voting, you may refer the Frequently Asked Questions ("FAQs") and e-voting manual available at www.evotingindia.com, under help section or write an email to helpdesk.evoting@cdslindia.com.

CONTACT DETAILS

Company	Radhey Trade Holding Limited **Regd. Off:** Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar - 361005. **Tel:** +91-288-2661942; **Email:** info@rholdings.org;
Registrar and Share Transfer Agent	Niche Technologies Pvt. Ltd **Regd. Off:** D-511, Bagree Market, 71 B R B Basu Road, Kolkata, West Bengal,700001 **Email:** nichetechpl@nichetechpl.com; **Tel. No.:** +91-33-22343576/22357270
e-Voting Agency	Central Depository Services (India) Limited **E-mail ID:**helpdesk.evoting@cdslindia.com **Phone :**+91-22-23058543
Scrutinizer	Zarna Solanki, Practicing Company Secretary **E-Mail ID:**cszarna@gmail.com

ROUTE MAP TO THE VENUE OF ANNUAL GENERAL MEETING



EXPLANATORY STATEMENT

(Pursuant to Section 102 (1) of the Companies Act, 2013 and Secretary Standard 2 on General Meetings)

Item No. 3 - Appointment of Mr. Ashokkumar Shah (DIN 03387128) as Non-Executive Independent Director of the Company:

The Board of Directors has, at its meeting held on March 27, 2018, appointed Mr. Ashokkumar Shah (DIN 03387128) as an Additional (Non-Executive Independent) Director of the Company with effect from March 27, 2018, pursuant to Sections 149 and 161 of the Companies Act, 2013, read with Article 102 of the Articles of Association of the Company.

Pursuant to the provisions of Section 161 of the Companies Act, 2013, Mr. Ashokkumar Shah (DIN 03387128) will hold office up to the date of the ensuing AGM. The Company has received notice in writing under the provisions of Section 160 of the Companies Act, 2013, from a member, along with a deposit of ₹ 1,00,000/- proposing the candidature of Mr. Ashokkumar Shah (DIN 03387128) for the office of Independent Director, to be appointed as such under the provisions of Section 149 of the Companies Act, 2013.

The Company has received from Mr. Ashokkumar Shah (DIN 03387128) (i) consent in writing to act as director in Form DIR 2 pursuant to Rule 8 of Companies(Appointment & Qualification of Directors) Rules 2014, (ii) intimation in Form DIR 8 in terms of Companies (Appointment & Qualification of Directors) Rules, 2014, to the effect that she is not disqualified under Sub-section (2) of Section 164 of the Companies Act, 2013, and (iii) a declaration to the effect that he meets the criteria of independence as provided in Sub-section (6) of Section 149 of the Companies Act, 2013.

In the opinion of the Board, Mr. Ashokkumar Shah (DIN 03387128), the Independent Director proposed to be appointed, fulfills the conditions specified in the Companies Act, 2013 and the Rules made thereunder and she is independent of the Management.

A copy of the draft letter for the appointment of Mr. Ashokkumar Shah (DIN 03387128) as Non-Executive Independent Director setting out the terms and conditions is available for inspection without any fee by the members at the Company's registered office during normal business hours on working days up to the date of the AGM.

The resolution seeking the approval of members for the appointment of Mr. Ashokkumar Shah (DIN 03387128) as Non-Executive Independent Director of the Company for a period up to March 26, 2023 pursuant to Section 149 and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder. He will not be liable to retire by rotation.

No director, key managerial personnel or their relatives, except Mr. Ashokkumar Shah (DIN 03387128), to whom the resolution relates, are interested or concerned in the resolution.

The Board recommends the resolution set forth in Item no. 3 for the approval of the members.

Item No. 4 - Appointment of Mr. Samir Chaudhary (DIN 08099141) as Non-Executive Independent Director of the Company:

The Board of Directors has, at its meeting held on April 18, 2018, appointed Mr. Samir Chaudhary (DIN 08099141) as an Additional (Non-Executive Independent) Director of the Company with effect from April 18, 2018, pursuant to Sections 149 and 161 of the Companies Act, 2013, read with Article 102 of the Articles of Association of the Company.

Pursuant to the provisions of Section 161 of the Companies Act, 2013, Mr. Samir Chaudhary (DIN 08099141) will hold office up to the date of the ensuing AGM. The Company has received notice in writing under the provisions of Section 160 of the Companies Act, 2013, from a member, along with a deposit of ₹ 1,00,000/- proposing the candidature of Mr. Samir Chaudhary (DIN 08099141) for the office of Independent Director, to be appointed as such under the provisions of Section 149 of the Companies Act, 2013.

The Company has received from Mr. Samir Chaudhary (DIN 08099141) (i) consent in writing to act as director in Form DIR 2 pursuant to Rule 8 of Companies(Appointment & Qualification of Directors) Rules 2014, (ii) intimation in Form DIR 8 in terms of Companies (Appointment & Qualification of Directors) Rules, 2014, to the effect that she is not disqualified under Sub-section (2) of Section 164 of the Companies Act, 2013, and (iii) a declaration to the effect that he meets the criteria of independence as provided in Sub-section (6) of Section 149 of the Companies Act, 2013.

In the opinion of the Board, Mr. Samir Chaudhary (DIN 08099141), the Independent Director proposed to be appointed, fulfills the conditions specified in the Companies Act, 2013 and the Rules made thereunder and she is independent of the Management.

A copy of the draft letter for the appointment of Mr. Samir Chaudhary (DIN 08099141) as Non-Executive Independent Director setting out the terms and conditions is available for inspection without any fee by the members at the Company's registered office during normal business hours on working days up to the date of the AGM.

The resolution seeking the approval of members for the appointment of Mr. Samir Chaudhary (DIN 08099141) as Non-Executive Independent Director of the Company for a period up to April 17, 2023 pursuant to Section 149 and other applicable provisions of the Companies Act, 2013 and the Rules made thereunder. He will not be liable to retire by rotation.

No director, key managerial personnel or their relatives, except Mr. Samir Chaudhary (DIN 08099141), to whom the resolution relates, are interested or concerned in the resolution.

The Board recommends the resolution set forth in Item no. 4 for the approval of the members.

DETAILS OF DIRECTOR SEEKING APPOINTMENT/RE-APPOINTMENT AT THE ANNUAL GENERAL MEETING

(Pursuant to Regulation 36(3) of SEBI (LODR), Regulations, 2015)

Particulars	Mr. Rahul Sharma	Mr. Ashokkumar Shah	Mr. Samir Chaudhary
Date of Birth		October 04,1855	January 09,1989
Date of Appointment for current term	August 29,2018	March 27, 2018	April 18, 2018
Educational Qualifications	--	--	A commerce graduate
Expertise in specific functional areas - Job profile and suitability	Mr. Rahul is having more than 10 years of experience in the field of trading of textiles and metals.He is also very active in capital market. His immense knowledge and understanding about trends of industry helps company to take safe bets while trading.	Mr. Ashok is having more than 20 years of experience in the field of textile and wood trading, currently he is exploring option of wood trading and other available options.	Having 5 years of experience in the field of capital market trading.
Directorships held in public companies*	Radhey Trade Holding Limited Goyal Associates Limited	Shangar Decor Limited Radhey Trade Holding Limited	Radhey Trade Holding Limited
Memberships / Chairmanships of committees of other public companies**	Members – 1 Chairman - 1	Members – 2 Chairman - 1	Members – 1 Chairman - 1
Inter-se Relationship with other Directors.	-	-	-

*Excluding foreign companies and Section 8 companies

**Includes only Audit Committee and Stakeholders' Grievances and Relationship Committee.

Registered office:
Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005.

For and on behalf of Board of Directors
Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918

Rahul sharma
Managing Director
DIN 03258779

Place: Jamnagar
Date: September 05, 2018

Radhey Trade Holding Limited
CIN: L67120GJ1981PLC103918
Registered Office: Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005
Tel: +91-288-2661942; **Email:** info@rholdings.org; **Web:** www.rholdings.org

ATTENDANCE SLIP

Regd. Folio No./DP Id No.*/Client Id No.*	
No. of Shares held	
Name and Address of the First Shareholder (IN BLOCK LETTERS) (Applicable for investor holding shares in electronic form.)	
Name of the Joint holder (if any)	

I/we hereby record my/our presence at the thirty seventh (37^{th}) Annual General Meeting of Radhey Trade Holding Limited held on Saturday, September 29, 2018 at 11.30 a.m. at the registered office of the Company situated at Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005

_____________________________________ _____________________________

Member's/Proxy's Name in Block Letters **Member's/Proxy's Signature**

Notes: Please fill up this attendance slip and hand it over at the entrance of the venue of meeting. Members are requested to bring their copies of the Annual Report to the AGM.

-- Please tear here--

PROXY FORM

(Form No. MGT-11 - *Pursuant to section 105(6) of the Companies Act, 2013 Rules made there under)*

Name of the member(s)	
Registered Address	
E-mail Id	
Folio No/Client Id	

I/We, being the member (s) of....................................shares of the above named company, hereby appoint

1. Name:________________________________
   Address:________________________________
   E-mail Id:______________ Signature: ______________or failing him
2. Name:________________________________
   Address:________________________________
   E-mail Id:______________ Signature: ______________or failing him
3. Name:________________________________
   Address:________________________________
   E-mail Id:______________ Signature: ______________or failing him

as my/our proxy to attend and vote (on a poll) for me/us and on my/our behalf at the thirty seventh (37^{th}) Annual General Meeting of Radhey Trade Holding Limited held on Saturday, September 29, 2018 at 11.30 a.m. at the registered office of the Company situated at Digvijay Plot, Street No. 51 Opposite Makhicha Nivas Jamnagar -361005 and/or any adjournment thereof in respect of such resolutions as are indicated below:

Resolution No.	**Resolution**	**Vote (Optional see Note 2) (Please mention no. of shares**		
Ordinary businesses		**For**	**Against**	**Abstain**
1.	To receive, consider and adopt the Audited Financial Statements of the Company for the financial year ended on March 31, 2018, together with the Reports of Board of Directors and the Auditor thereon.			
2.	To appoint a Director in place of Mr. Rahul Sharma (DIN 03258779), who retires by rotation and being eligible, seeks re-appointment.			
Special Businesses				
3.	Appointment of Mr. Ashokkumar Shah (DIN 03387128) as Non-Executive Independent Director of the Company.			
4.	Appointment of Mr. Samir Chaudhary (DIN 08099141) as Non-Executive Independent Director of the Company.			

Signed this............day of**………………………………………….,** 2018

Affix Revenue Stamp of not less than ₹ 1

____________________ ______________________

Signature of shareholder **Signature of Proxy holder(s)**

Note:

1. This form, in order to be effective, should be duly stamped, completed, signed and deposited at the registered office of the Company, not less than 48 hours before the Annual General Meeting (on or before September 27, 2018 at 11:00 A.M.)
2. It is optional to indicate your preference. If you leave the 'for', 'against' or 'abstain' column blank against any or all of the resolutions, your proxy will be entitled to vote in the manner as he/she may deem appropriate.

To,

Dear Shareholder(s),

Ref: Radhey Trade Holding Limited (CIN: L67120WB1981PLC033991**)**

Sub: Updation of Shareholder Information

The Securities and Exchange Board of India vide Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018 has mandated submission of Permanent Account Number (PAN) and bank account details of all securities holders holding securities in physical form. Further, SEBI has given a notification on June 8th, 2018 stating that physical transfer of shares will be allowed until December 4th, 2018 vide Circular No. SEBI/LAD/NRO/GN/2018/24. Hence, kindly send your shares for transfer before December 4th, 2018 or demat your shares with your Depository Participant at any time after updating your KYC information with us. Kindly submit the following details and documents to the address mentioned below within **21 days of receipt of this communication**. **As per our records, your folio needs to be updated with the PAN / Complete Bank details so that the investments held by you are in compliance with the aforementioned circular.**

Registered Folio No.:				
Mobile No.				
Email Id				
Name of the first/sole shareholder Address:				
Bank Name of First Holder				
Branch Address & Branch				
Bank Account Number				
Account Type (Please tick the option) (√)	Saving	Current	Cash Credit	Others
MICR No.				
IFSC Code				

Name	**Permanent Identification Number**	**Signature**
1.		
2.		
3.		

I/We hereby, declare that the particulars given above are correct and complete. I/We, further undertake to inform the Company of any subsequent change(s) in the above particulars.

Note:

1. **Please fill in the information in CAPITAL LETTERS in ENGLISH ONLY.**
2. **Original Copy of this letter, duly filled, shall be sent to Niche Technologies Pvt. Ltd(Unit –Radhey Trade Holdings Limited) at D-511, Bagree Market, 71 B R B Basu Road,Kolkata,West Bengal,700001**
3. **Kindly enclose:-**
   - **a. Copy of Self attested Pan Cards of all the shareholder(s) i.e. all joint shareholders**
   - **b. Copy of address proof of First Holder (Preferably Aadhar Card)**
   - **c. Copy of cancelled cheque of First Holder**

SPECIFIC ATTENTION OF THE MEMBERS IS DRAWN TO THE FOLLOWINGS:

1. The members who holds shares of the Company in Physical form are informed that the company is in process of updating records of the shareholders in order to reduce the physical documentation as far as possible. In line with new BSE listing agreement and SEBI Circular No. SEBI/HO/MIRSD/DOP1/CIR/P/2018/73 dated April 20, 2018, it is mandatory for all the investors including transferors to complete their KYC information. Hence, members are requested to update and intimate their PAN, phone no., e-mail id and such other information to the Company's Registrars and Transfer Agents, Niche Technologies Pvt. Ltd (NTPL). Members are further requested to update their current signature in NTPL system.
2. In accordance with BSE Circular No. LIST/COMP/15/2018-19 dated July 5, 2018, all shareholders are hereby informed that with effect from December 5, 2018, the shares lodged for transfer shall must be in dematerialized form only and no physical shares can be lodged for transfer. Hence, Members holding shares in physical form are requested to consider converting their holdings to dematerialized form to eliminate all risks associated with physical shares and for ease of portfolio management. Members can contact NTPL for assistance in this regard.
3. Members holding shares in physical form, in identical order of names, in more than one folio are requested to send to NTPL, the details of such folios together with the share certificates for consolidating their holdings in one folio. A consolidated share certificate will be issued to such Members after making requisite changes.
4. Members holding shares in dematerialized form are requested to intimate all changes pertaining to their bank details such as bank account number, name of the bank and branch details, MICR code and IFSC code, mandates, nominations, power of attorney, change of address, change of name, e-mail address, contact numbers, etc., to their depository participant (DP). Changes intimated to the DP will then be automatically reflected in the Company's records which will help the Company and the Company's Registrars and Transfer Agents to provide efficient and better services.
5. The Securities and Exchange Board of India ("SEBI") has mandated the submission of Permanent Account Number (PAN) by every participant in securities market. Members holding shares in electronic form are, therefore, requested to submit the PAN to their depository participants with whom they are maintaining their demat accounts.
6. As per the provisions of Section 72 of the Act, the facility for making nomination is available for the Members in respect of the shares held by them. Members who have not yet registered their nomination are requested to register the same by submitting Form No. SH-13. The Nomination Form can be obtained from the NTPL. Members holding shares in physical form may submit the same to NTPL. Members holding shares in electronic form may submit the same to their respective depository participant.
7. The Company is concerned about the environment and utilizes natural resources in a sustainable way. We request every member to update their email address with concerned Depository Participant and PSIPL to enable us to send you the communications via email.