

**“Annexure B” to the Independent Auditors’ Report**

(Referred to in paragraph 1 under ‘Report On Other Legal And Regulatory Requirements’ section of our report to the members of **V.I.R. FOODS LIMITED**. of even date)

On the basis of the information and explanation given to us during the course of our audit, we report that

(i) (A) The company has not maintained proper records showing full particulars, including quantitative details due to which depreciation has been provided on STRAIGHT LINE METHOD value basis at the rates specified XIV of The Companies Act, 1956. This is not as per the applicable provisions of the Companies Act, 2013 which requires the depreciation to be charged as per the useful life of the asset.

As observed in the main report, because of attachment orders, the realisability of the assets is questionable.

(B) The company is not having any intangible asset. Therefore, the provisions of Clause (i)(a)(B) of paragraph 3 of the order are not applicable to the company.

b) The company has not maintained proper records showing full particulars, including quantitative details, we are unable to comment on the material discrepancy, if any.

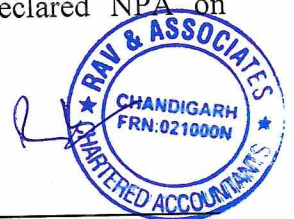
c) According to the information and explanations given to us, the company own immovable properties in its name.

d) The company has not revalued its Property, Plant, and Equipment during the year. Therefore, the provisions of Clause (i)(d) of paragraph 3 of the order are not applicable to the company

e) No proceedings have been initiated or are pending against the company for holding any benami property under the Benami Transactions (Prohibition) Act, 1988 (45 of 1988) and rules made thereunder. Therefore, the provisions of Clause (i)(e) of paragraph 3 of the order are not applicable to the company.

(ii) a) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the company does not have any physical inventories.

b) According to the information and explanations given to us and on the basis of our examination of the records of the Company, the Company has been sanctioned working capital limits in excess of five crore rupees, in aggregate, from banks on the basis of security of current assets. The company had taken a cash credit limit of Rs. 15.80 crores, an adhoc limit of 4.55 crores, FITL of Rs.3.57 crores and WCTL of Rs.4.20 crores from Punjab National Bank which has been declared NPA on 17.05.2017.





(iii) (a) In our opinion and according to the information provided to us the company has not made any investments and provided guarantees and granted unsecured loans or advances in the nature of loans .However, In our opinion and according to the information and explanations given to us, the Company has given corporate guarantee to the tune of Rs.34 Crores to M/s Bharat Food & Agro Products.

(iv) According to the information and explanations given to us and on the basis of our examination of the records, in respect of loans, investments, guarantees, and security, provisions of section 185 and 186 of the Companies Act, 2013 have been complied with.

(v) According to the information and explanations given to us, the Company has not accepted deposits from the public in terms of provisions of sections 73 to 76 of the Companies Act, 2013. However, the company is in legal dispute with NSEL and as opined in the main report, the finality of the decisions may impact this clause.

(vi) According to the rules prescribed by the Central Government for the maintenance of cost records under section 148(1) of the Companies Act, 2013 is not applicable to the company therefore reporting under this clause is not required.

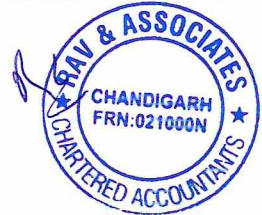
(vii) a) According to the information and explanations given to us and the records of the Company examined by us, in our opinion, the Company has been generally regular in depositing statutory dues as applicable, with the appropriate authorities except there have been certain delays in payment of Labour welfare fund due to website error maintenance. There are no statutory dues that are outstanding as of March 31, 2022, for a period of more than six months except for the following payables :

Income Tax Payable	Rs. 88,43,946.00
TDS Payable	Rs. 297946.00
EPF Payable	Rs. 8242.00
GST Payable	Rs. 157241.68

b) According to the information and explanations given to us, and the records of the companies examined by us, there are no disputed dues of GST, income tax, custom duty, service tax, wealth tax, Value added tax, excise duty and cess which have not been deposited except for the following:

AY 2012-13 is Rs. 99,24,430 under Sec. 147 of the Income Tax Act, 1961

(viii) In our opinion and according to the information and explanations given to us, there is no transaction not recorded in the books of account have been surrendered or disclosed as income during the year in the tax assessments under the Income Tax Act, 1961 (43 of 1961)





(ix) a) In our opinion, on the basis of audit procedures and according to the explanations given to us, the company has defaulted in repayment of dues to the Punjab National Bank, Mohali. The account of the Company has been classified as Non-Performing Asset vide letter dated 31.05.2017. The Company has not issued any debentures.

b) In our opinion and according to the information and explanations given to us, the company has an NPA account with Punjab National Bank for Rs. 31.77 cr.

c) In our opinion and according to the information and explanations given to us, the limit was first availed in the year 2005-16 and has become NPA in the Year 2017-18.

d) In our opinion and according to the information and explanations given to us, there are no funds raised on short-term basis during the year which have been utilised for long-term purposes.

e) In our opinion and according to the information and explanations given to us, the company has not taken any funds from any entity or person on account of or to meet the obligations of its subsidiaries, associates or joint ventures.

f) In our opinion and according to the information and explanations given to us, the company has not raised loans during the year on the pledge of securities held in its subsidiaries, joint ventures or associate companies.

(x) According to the information and explanations given to us, on an overall basis, the company has not raised any money by way of initial public offer or further public offer (including debt instruments)

(xi) a) According to the information and explanations given to us and on the basis of representation of the management which we have relied upon, no fraud by the Company or on the company by its officers or employees has been noticed or reported during the year.

b) During the year no report under sub-section (12) of section 143 of the Companies Act has been filed by the auditors in Form ADT-4 as prescribed under rule 13 of Companies (Audit and Auditors) Rules, 2014 with the Central Government.

c) As auditors, we did not receive any whistle-blower complaints during the year.

(xii) In our opinion and according to the information and explanations given to us, no remuneration has been paid to any of the directors. Thus the clause not applicable. The Ministry of Corporate Affairs has not prescribed other details under section 197(16) which are required to be commented upon by us.

(xiii) Since the company is not a Nidhi company, therefore this clause is not applicable.

(xiv) According to the information and explanations given to us, all transactions with the related parties are in compliance with section 177 and 188 of The Companies Act, 2013 as applicable and the details have been disclosed in the Financial Statements as required by the applicable accounting standards.





(xv) The company is not covered by section 138 of the Companies Act, 2013, related to appointment of internal auditor of the company. Therefore, the company is not required to appoint any internal auditor. Therefore, the provisions of Clause (xiv) of paragraph 3 of the order are not applicable to the Company.

(xvi) According to the information and explanations given to us based on our examination of the record 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.

(xvii) According to the information and explanations given to us based on our examination of the record of the company, the company has not entered into any noncash transactions with directors or persons connected with him. Therefore the provisions of clause 3(xv) of the order are not applicable.

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

b) The company has not conducted any Non-Banking Financial or Housing Finance activities during the year.

c) The company is not a Core Investment Company (CIC) as defined in the regulations made by the Reserve Bank of India. (d) As per the information and explanations received, the group does not have any CIC as part of the group.

(xix) The company has been pursuing court cases against NSEL for recovery and also with the Bank for settlement of the loan. Except for this, the company has not done any business during the year and only incurring expenditure towards filing of statutory compliances.

(xx) There has been no resignation of the previous statutory auditors during the year.

(xxi) The company is pursuing court case against NSEL for recovery of the amount outstanding and also settlement with the Bank for closing the NPA account. The company has outstanding receivables and payables on the Balance sheet date which are pending to be realised and paid. The outcome of these cases may impact the financial viability of the company.

According to the information and explanations given to us and on the basis of the financial ratios, ageing and expected dates of realisation of financial assets and payment of financial liabilities, other information accompanying the financial statements, our knowledge of the Board of Directors and management plans and based on our examination of the evidence supporting the assumptions, nothing has come to our attention, which causes us to comment on the assurance as to the future viability of the company and that the company will be able to recover in the future. We further state that our reporting is based on the facts up to the date of the audit report and we neither give any guarantee nor any assurance that all liabilities falling due within a period of one year from the balance sheet date, will get discharged by the Company as and when they fall due.

(xxii) There is no liability of the company under the provisions of section 135 of the



# RAV & ASSOCIATES

CHARTERED ACCOUNTANTS

Companies Act, relating to Corporate Social Responsibility. Therefore, the provisions of Clause (xx) of paragraph 3 of the order are not applicable to the Company.

(xxiii) The company has not made investments in the subsidiary company. Therefore, the company does not require to prepare a consolidated financial statement. Therefore, the provisions of Clause (xxi) of paragraph 3 of the order are not applicable to the Company

- For RAV AND ASSOCIATES.

**Chartered Accountants**

FRN: 021000N

Rupali Goyal  
(Partner)  
M. No. : 504847



Date: 22-09-2023

UDIN 23504847BQV10W7033