COMPANIES ACT, 2013

CS SHRADDHA SINGHI_MAY, 2014
(SUNDARAM STEELS PVT. LTD.)

INTRODUCTION – An Act to consolidate and amend the law relating to companies

- 64^{th} Year of Republic of India has been a mixed bag of surprises & shocks for Corporate.
- Companies Bill was considered and approved by the Lok Sabha on 18 December 2012 as the Companies Bill, 2012 (the Bill).
- The Bill was then considered and approved by the Rajya Sabha too on 8 August 2013. It received the President’s assent on 29 August 2013 and has become

The Companies Act, 2013.

NEW CONCEPT & TERMS

S. #	TERM	MEANING
1	OPC	A Co. which has only one person as member. **: 1st OPC belong to Delhi : U93000DL2014OPC267546**
2	Small company: (other than public co.)	: paid up capital- not more than 50 lac or as prescribed (limit 5 crore). : Turnover- not more than 2 crore or as prescribed (limit 20 crore).
3	Dormant company	: Application by a company formed & registered under this act : Co. that has no significant accounting transaction
4	Subsidiary	,Holding co.(layer – holding-subsidiary-subsidiaries) :controls the composition of BOD :holds or controls more than Half percent of total share capital
5	Book &/or paper	be it hard copy or **soft copy** : books of account, deeds, vouchers, writings, documents, minutes and registers
6	Electronic mode "E"	Electronic mode of keeping documents recognized - "save paper jingle".

………….NEW CONCEPT & TERMS

S. #	TERM	MEANING	
7	Financial statement	Balance Sheet	Profit & loss/income & exp. A/c
		Cash Flow Statement (except OPC, small co. & dormant co.)	Any explanatory note (statement of equity change)
8	KMP’s	CEO /WTD	CS
		CFO	OFFICER AS PRECRIBED
9	Financial Year	1st April to 31st March (2 year rest period to comply) Exception: Company (H/S), incorporated o/s India	
10	Associate Company	Company in which that other Company has a**significant influence, but which is not a subsidiary Company of the Company having such influence and includes a Joint Venture Company.. **means control of at least twenty per cent of total share capital, or of business decisions under an agreement.	

1956 V/s 2013 (CORPORATES)

1956

- 13 Parts
- 658 Sections
- 15 Schedules

2013

- 29 Chapters
- 470 Sections
- 7 Schedules

………1956 V/s 2013 …………

S. #	TERM	1956	2013
1	Director	Includes any person occupying the position of director, by whatever name called.	Means a director appointed to the Board of a company.
2	Free Reserves	Yes: Out of Profit Security prem. A/c	No: Share premium A/c Credit balance in P&l
3	Net Worth	Paid-up capital + Free reserve - prov. or exp.	Paid-up capital + share premium + reserves created out of profit
4	Relative	• HUF • Husband & wife • Related as peer Sch. IA	• HUF • Husband & wife • Other as prescribed
5	Sick Industrial Companies	SICA, 1985 – net worth Limited to industrial co.'s	Chapter XIX - repayment ability Applicable on all companies
6	Private Co.	Max. # of members: 50	Max # of members: 200

............1956 V/s 2013 ....

S. #	TERM	1956	2013
7	Incorporation of company	COI used to be conclusive evidence	COI no longer conclusive evidence **if incorporation on false statement
8	Memorandum of Association	• Name>State>Main objects>Other objects>Subscription clause	• Other objects no longer to continue
9	Formats AOA	• Table – B – Company limited by shares • Table – C – Company limited by guarantee and not having share capital • Table – D- company limited by guarantee and having share capital • Table – E- Unlimited company	• Table –F- company limited by shares • Table – G- company limited by guarantee and having share capital • Table – H- Company limited by guarantee and not having share capital • Table – I – Unlimited company having share capital • Table – J- Unlimited company not having share capital

………….1956 V/s 2013 ………….

S. #	TERM	1956	2013
10	Commencement Of business	Applicable to Public Company	Applicable to both Public & Pvt. Company
11	Mandatory info on letter head, bill, memos, other correspondence	Mentioning • Name • Registered office	• Name • Registered office • Corporate Identity Number • Telephone number • Fax number, if any • Email Address, if any • Website addresses, if any
12	Mandatorily mentioning DIN#	No provision	Person & company to mention DIN # of Director on • Return • Information • Particulars on ref. of Director
13	Name Change (last two years)	No Provision	Every Co. have its former name printed affixed outside its office, on its letter head,

…………1956 V/s 2013 …………

S. #	TERM	1956	2013
10	Resident Directors	No provision	Every company shall have at least one Director who has stayed in India for a total period of not less than 182 days in the previous calendar year.
11	Maximum number of Directors	Max. 12 and beyond 12 required prior Central Govt. Approval	Max. 15 and beyond 15 – SR is to be passed.
12	Consolidation of accounts	Section 212 provided for attachment of accounts of subsidiaries along with the holding company accounts.	Compulsory consolidation of accounts of holding and subsidiaries including its associates & joint ventures

IMMEDIATE -ACTIONS

S. #	Action	How?
1	Printing of new Stationary	• Paint/affix name, reg. off. Address, outside every office. • PRINT (Name, address, CIN #) , email, fax # , if any, in all business letters, billheads, letter, paper and in all notice and other official publication. • have name on hundies, promissory notes, etc
2	Resident Director	• At least one of the directors who is resident in India shall be appointed on the Board of every Company. • The existing Company shall comply with this provision within one year
3	Acceptance of deposits / unsecured loan	• Prohibition extended to private ltd. companies • A private company is prohibited to accept unsecured loans/deposits from relatives of directors. • Deposits accepted from 'Member' are subject to certain terms, conditions and procedures. • In case of pending deposits as on 31.03.2014 (comply) a. Return of deposit/loans – 30.06.2014 – form DPT -4 b. Repay deposit/loans – 31.03.2015
4	Alteration of MOA & AOA2	It is advisable to alter MOA – AOA of companies

IMMEDIATE -ACTIONS

S. #	Action	How?
5	Limit on number of directorship/	• maximum of 20 companies (including as alternate director) Maximum in 10 public companies
6	Board – P & D	Certain new P & D, power and duties have been assigned to directors. - same shall be noted by co. in 1^{st} qtr meeting
7	Disclosure of Directors' interest	Interest of Director - MBP1 (all list of relatives) File resolution in form – MGT- 14
8	New registers to be made	Formats of all the registers has been changed, thus all the registers be made in new format.
9	Allotment of Shares	• Co's time bound to issue shares within 60 days of application – if not repay it within 15 days Otherwise It shall be treated as DEPOSITS (payoff by 30^{th} May, 2014) from 76^{th} day (60+15 = 75)

IMMEDIATE -ACTIONS

S. #	Action	How?
10	CSR	2% of average net profits of last 3 years on CSR activities by Co's having: • net worth of ` 5 billion or more; or • turnover of ` 10 billion or more; or • net profit of ` 50 million or more
11	NCLT	2013 Act replaces the High Court with a Tribunal to be known as NCLT
12	SICK Co.	Inability to pay debts will be considered as criteria for determining a sick company. Industrial Co. replaced by All companies
13	Further issue of capital	Now applicable to all companies.

Chapter V

DETAILED PROVISIONS

Acceptance of Deposits

DEPOSITS – Chapter 5 (Sec 73 to 76)

APPLY TO

- Companies except are not permitted to invite, accept or renew 'deposits' from public

DOESN'T APPLY TO

- Banking company
- NBFC (RBI Act)
- Other companies as CG may specify

REPAYMENT OF DEPOSITS ACCEPTED ON OR BEFORE 31^{ST} MARCH, 2014.

- a) All Companies having outstanding deposit or interest thereon shall be filed with ROC in form DPT 4 within 3 months from the Commencement of the Act (i.e. 30^{th} June, 2014) or from the date on which such payment are due.

- b) Repay within 1 year (i.e. 31^{st} March, 2015) from such commencement or from the date on which such payments are due, whichever is earlier.

- c) NCLT may, after considering the financial condition provide extra time.

What DOESN'T Constitute DEPOSITS

Deposit includes **any receipt** of money by way of **deposit or loan or in any other form**, by a Company

Following amount received **shall not be considered Deposits** under this Chapter-

- Any amount recd. Or repayment guaranteed From CG, SG, local authority, statutory authority constituted under an act of parliament or state legislature.
- Any amount recd. From foreign or international bank/ institution etc.
- Any amount recd. As a loan from a banking institution including as notified under Banking regulation Act.
- Any amount recd. As a loan from public financial institution/Regional financial institutions/scheduled banks.
- Any amount recd. Against commercial paper or any instrument issued in accordance with the guidelines of RBI.
- Any amount recd. From any other company.

What DOESN'T………………

- Any amount recd. Against subscription to any securities including share application money PROVIDED, securities are allotted within 60 days from the date of receipt of the application. IF securities are not allotted within 60 days then same should be refunded within 15 days else the same shall be treated as deposit from

  76 days (60+15 = 75 days).

- Any amount recd. from a person who at the time of receipt was a director PROVIDED the director furnishes a declaration that the amount given is not out of borrowed funds.

- Any amount raised by issue of bonds or debentures secured by first charge on any assets excluding intangible assets.

- Any amount received from an employee of the company not exceeding his annual salary in the nature of non interest bearing security.

What DOESN'T……………..

- Any amount received as a Non- interest bearing amount received or held in trust.
- Any amount received in the course of or the purpose of the business for the Following :

  A) As advance for the supply of goods or provision of services PROVIDED such advance is appropriated against supply of goods or provision of service within 365 days from the receipt of such amount.

  B) As advance received in connection with consideration for property under an agreement or arrangement .

  C) As security deposit for the performance of the contract for supply of goods or provision of services.

  D) As advance received under long term projects for supply of capital goods.

IF any item of A, B & D becomes refundable due to the reason that company does not have necessary approval/permission then such amount shall be treated as DEPOSITS after expiry of 15 days from the date it becomes refundable.

What DOESN'T………………

- Any amount brought in by the promoters of the company by way of unsecured loan in pursuance of the stipulation of any lending financial institution or a bank subject to fulfillment of the following conditions, namely:

  a) Loan brought under stipulation by lending financial institution.

  b) Loan is by Promoters/relatives

  c) Exemption available till loan is repaid in full.

- Any amount recd. By a NIDHI Co.

DETAILED PROVISIONS

Chapter VII

Management & Administration

Register of Members –Debenture Holder

- Every company limited by shares shall, from the date of its registration, maintain a register (Principal register) of its members in **Form No. MGT.1**

  PROVIDED in case of Existing Co.'s : complied within 6 months.

- Every company which issues or allots debentures or any other security shall maintain a separate register in **Form No.MGT.2.**

NOTES:

ENTRIES TO BE MADE IN REGISTERS WITHIN 7 DAYS AFTER APPROVAL OF SUCH ALLOTMENT OR TRANSFER BY BOD.

ENTRIES IN THE REGISTER SHALL BE AUTHENTICATED BY CS OR DIRECTOR AUTHORIZED AND DATE OF RESOLUTIION AUTHOURIZING SHALL BE MENTIONED.

7 DAYS PRIOR NOTICE IS TO BE GIVEN DURING CLOSURE OF REGISTER.

PAN #, E-MAIL ID, CIN & UIN ARE MENTIONED

PRESERVATION OF REGISTER OF MEMBERS/ANNUAL RETURN – 8 YEARS

ANNUAL RETURN N - 7 pages to 42 pages

- Annual Return to be prepared in **Form No. MGT.7.**

- Annual return, filed by:-

  a LISTED COMPANY

or

  a company having PAID – UP SHARE CAPITAL of 10 Crore rupees or more

or

  TURNOVER of 50 Crore rupees or more,

  shall be certified by a Company Secretary in practice and the certificate shall be in **Form No. MGT.8**

- Extract of Annual Return to be attached with Board Report in **Form MGT.9.**

ANNUAL RETURN…….

CHALLENGES

- Certification of Compliances of All provisions of the Act
- Wrong Certification penalty : from Rs. 50,000/- up to Rs. 5 Lacs.

ANNUAL RETURN TO BE CERTIFIED BY PCS

- **Principal business activities;**
- **Particulars of its holding, subsidiary and Associate Companies;**
- **Promoters, directors, KMP along with changes therein;**
- **Meetings of members or a class thereof;**
- **Board and its various committees along with attendance details;**
- **Remuneration of directors and KMP, penalty or punishment imposed on the company, its directors or officers and details of compounding of offences and appeals made against such penalty or punishment.**
- **Matters relating to certification of compliances**

RETURN FOR PROMOTER STAKE CHANGE

RETURN OF CHANGES IN SHAREHOLDING PATTERN OF PROMOTER & TOP 10 SHAREHOLDERS

APPLICABILITY : LISTED COMPANY

Specified Companies to file a return to RoC, within 15 days of CHANGE with respect to Shareholding Pattern .

NOTE:

- Here Change means **2% or more** shareholding.
- **Form MGT.10** is to be filed with ROC.

NOTICE - PROXY OF MEETING

NOTICE

- A Company may give notice through electronic mode- as a text or as an attachment.
- The subject line in e-mail shall state the
  - name of the company,
  - notice of the type of meeting,
  - place and the date on which the meeting is scheduled.
- Every company shall observe Secretarial Standards with respect to General and Board Meetings specified by ICSI and approved by the CG.

PROXY

- Format of proxy - Form No. MGT.11.
- A person cannot act as proxy for more than 50 members, who hold not more than 10% of voting rights.
- Person holding more than 10% voting rights may appoint a single person as proxy who shall not be proxy for any other person or shareholder.
- Care should be taken where the promoter, body corporate appoints a proxy who may be a Director and such Director should not be appointed as proxy by anybody else.
- Both may get invalid in that event

AGM-EGM

- First AGMs to be conducted within 9 months from close of Financial Year;
- AGM to be called during Business Hours (9 am to 6 pm);
- Not allowed on National Holiday;
- Voting through electronic mode recognized;
- **Quorum:**

<1000 members – 5 members;

1000-5000 members – 15 members;

5000 or more members – 30 members

VOTING THROUGH ELECTRONIC MEANS

- Applicable for
  - All Listed entities
  - Company having not less than 1000 shareholders
  - For voting at any general meetings, which Includes
  - AGM and EOGM and Class meetings of shareholders

- Notices to be sent to Auditors and Directors and Members
  - Registered or Speed post (Postage Cost to be budgeted)
  - Electronic means (registered email id)
  - Through Courier service (huge business opportunity)
  - Notice on the website of Company

Chapter IX

DETAILED PROVISIONS

Accounts of Companies

APPOINTMENT – INTERNAL AUDITOR

Companies required to appoint internal auditor (existing co. – 6 months)

(A) Every listed company;

(B) Every unlisted public company having-

(i) paid up share capital of 50 crore rupees or more during the preceding financial year; or

(ii) turnover of 200 crore rupees or more during the preceding financial year; or

(iii)outstanding loans or borrowings from banks or PFI's,100 crore rupees or more at any point of time during the preceding financial year; or

(iv)outstanding deposits 25 crore rupees or more at any point of time during the preceding financial year; and

(C) Every private company having-

(i) turnover of two hundred crore rupees or more during the preceding financial year; or

(iii)outstanding loans or borrowings from banks or PFI's, one hundred crore rupees or more at any point of time during the preceding financial year

INTERNAL AUDITOR

WHOM TO BE AN INTERNAL AUDITOR

(i) the internal auditor may or may not be an employee of the company;

(ii) ‘Charted Accountant’ shall mean a Chartered Accountant whether engaged in practice or not.

NOTE:

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

ACCOUNTS

Every company shall file the financial statements with Registrar together with Form **AOC-4.**

Voluntary revision of Financial statements or Board's report – up to 3 years - NCLT

National Financial Reporting Authority recommending CG regarding accounting policies/auditing & accounting standards

"Financial year", in relation to any company or body corporate, means the period ending on the 31st day of March every year.
Existing co.'s – 2 years relief

Where a company has been incorporated on or after the 1st day of January of a year, the period ending on the 31st day of March of the following year, in respect whereof financial statement of the company or body corporate is made up.

Consolidated Financial Statement

- Consolidation of financial statements is made **mandatory for all companies** where a company has one or more subsidiaries whether Indian or foreign.
- The mandatory consolidation applies to all companies whether such company is:
  - listed or unlisted;
  - private or public.

•Balance Sheet
•P&L a/c
•Cash Flow Statement
•Any explanatory Statement
•Change of Equity Statement (if applicable)

FOR - Consolidation of Financial Statements
EXPRESSION - subsidiary includes

ASSOCIATE

JOINT - VENTURE

SUBSIDIARY COMPANY

Subsidiary includes associate company and joint venture

- ‘Associate company’, in relation to another company, means a company in which that other company has a **Significant Influence**, but which is not a subsidiary company of the company having such influence and includes a joint venture company.

- ‘Significant Influence’ means **Control** of at least 21% of total share capital, or of business decisions under an agreement.

- ‘Control’, shall include the right to appoint majority of the directors or to control the management or policy decisions exercisable by a person or persons acting individually or in concert, directly or indirectly, including by virtue of their shareholding or management rights or shareholders agreements or voting agreements or in any other manner.

SUBSIDIARY COMPANY

- 2013 Act defines a subsidiary company, in relation to any other company (that is to say the holding company), means a company in which:

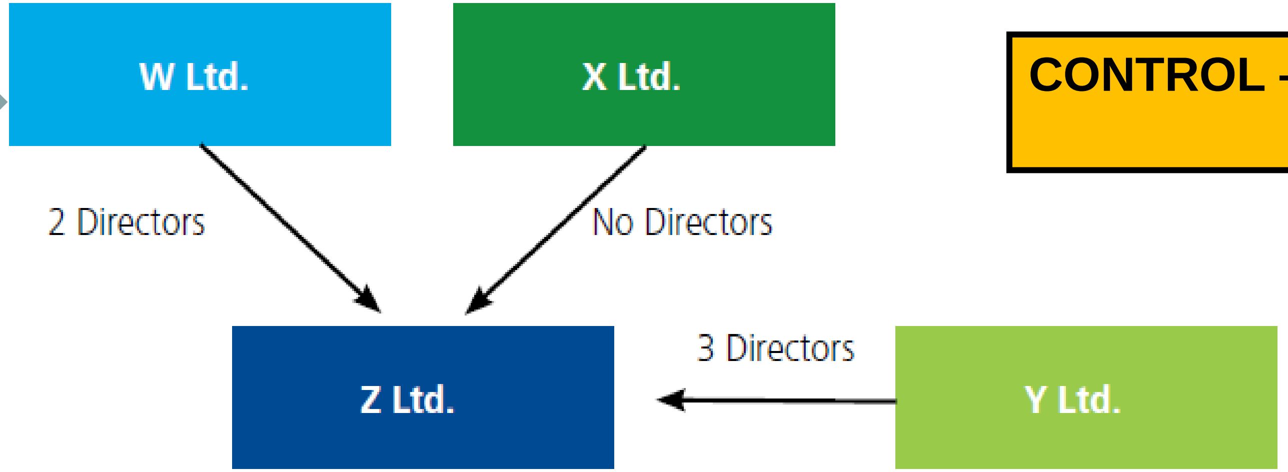
The holding company controls the composition of the Board of Directors i.e. if that other company by exercise of some power exercisable by it at its discretion can appoint or remove all or a majority of the directors;

Or

The holding company exercise or control more than ½ of the total share capital either at its own or together with one or more of its subsidiary companies.

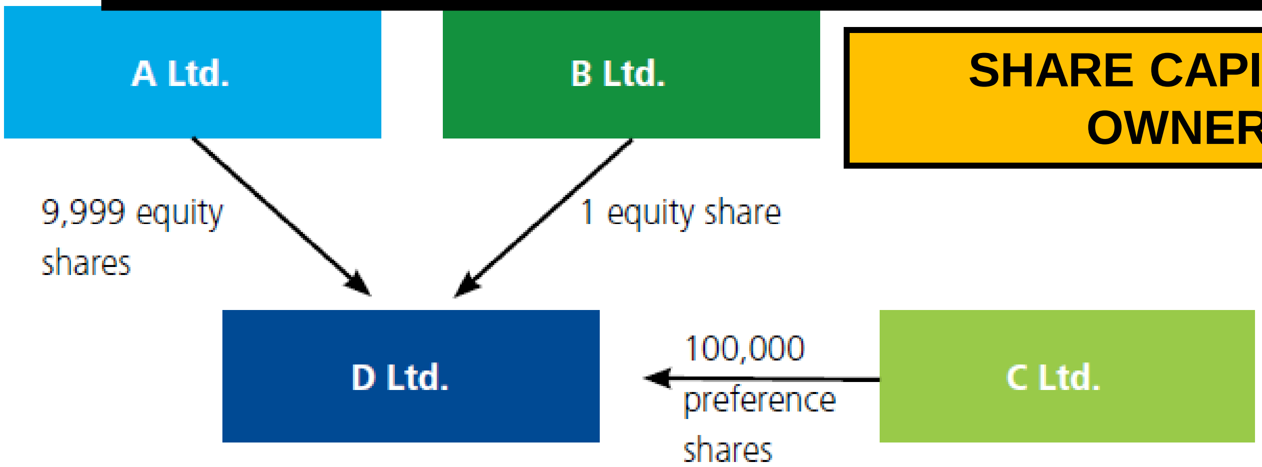
A company shall be deemed to be a subsidiary company of the holding company even if the control referred above is of another subsidiary company of the holding company.

CONTROL – BOARD OF DIRECTORS



Z Ltd. is a subsidiary of Y Ltd., since Y Ltd. controls the composition of the BOD of Z Ltd. In this scenario, there is no change between the position under 1956 Act and 2013 Act.

SHARE CAPITAL - OWNERSHIP



Equity / Preference shares of ₹ 10 each

In this scenario, D Ltd. is a subsidiary of A Ltd. under the 1956 Act. However, under 2013 Act, D Ltd. will be subsidiary of C Ltd.

Chapter X

DETAILED PROVISIONS

Audit & Auditors

AUDITOR

Appointment	Period of appointment
At first AGM **OR – for Ratification**	to hold office till conclusion of 6th AGM subject to ratification by members at every AGM
Subsequent	to hold office till conclusion of 6th meeting, subject to ratification by members at every AGM

- Board may ask for any information to the Auditor as it may deem fit.
- A written consent and a certificate (eligible/qualification/disqualification) from auditor is to be obtained.
- Notice of such appointment to be filed with Registrar – within 15 Days. Form **ADT-1**

APPOINTMENT OF AUDITOR

Appointment of first auditor on incorporation	Appointment of auditor other than the first auditor
• To be appointed by the BOD within 30 days of incorporation of a company. • If the first auditor is not appointed by the BOD within 30 days then the members shall appoint the first auditor within 90 days at the EGM. • The tenure of the first auditor shall be up to the conclusion of first AGM.	• Class of Companies to follow Mandatory Rotation requirement. • Non – specified companies subject to ratification of auditor in every AGM to ratify.

ROTATION OF STATUTORY AUDITOR

APPLICABILITY

- All Listed Company,
- Unlisted Public Companies having paid up share capital of Rs.10 crore or more,
- Private limited companies having paid up share capital of Rs. 20 crore or more or
- All Companies having public borrowings from financial institutions, banks or public deposits of Rs. 50 Crores or more

MANDATORY REQUIREMENT

a) after 5 years in case of individual and

b) after 10 years in case of firms

- No auditor/audit firm/audit firms having common partners, shall accept an audit for a
- consecutive term of 5 years after 5 years have been completed.

Transition provision to comply within 3 years.

AUDITOR – ROTATION

APPLICABLE ON CLASS OF COMPANIES

Auditors since last 20 years	• Transition of 3 year
Auditors since last 9 years	• 1 year

DISQUALIFICATION - AUDITOR

The following persons are disqualified to be auditor:

- **A body corporate**
- **An officer or employee of the company**
- **A person who is a partner, or who is in the employment**
- **of an officer or employee of the company**
- **Holding of Security**
- **Indebtedness**
- **Also applicable to guarantee given or security provided in connection of indebtedness of third person.**

Removal of Auditor stringent rules:

Central government approval and special resolution required to remove auditor before his term. Also company will need to pass special resolution at the AGM.

DISQUALIFICATIONS OF AUDITORS – PROHIBITED SERVICES

The following services are however specifically not permitted:

- Accounting and book keeping services;
- Internal audit;
- Design and implementation of any financial information system;
- Actuarial services, Investment advisory / banking services;
- Outsourced financial services and;
- Management services – Activities responsibility of Management;
- Other kind of services as prescribed.

REGISTERED VALUERS

Where valuation is required to be made under the Act, in respect of any property, stocks, shares, debentures, securities or goodwill or other assets or of net worth of a company or its liabilities, such valuation shall be done by a registered valuer (prescribed people to be Registered Valuers).

Scope

Any valuation under the Companies Act 2013: to be done by registered valuer. Illustratively;

- Valuation of further issue of shares
- Valuation of properties / assets of the company for non cash consideration
- Valuation report in respect of shares, properties etc. for compromise and arrangement
- Valuation for purposes of minority squeeze out
- Voluntary winding up – valuation of assets

ADDITIONAL DISCLOSURE IN BOARD'S REPORT

- Extract of Annual Return,
- Company's policy on directors' appointment and remuneration,
- Explanation and comments by directors on every qualification of statutory as well as secretarial auditor,
- Particulars of all loans / guarantees given and investments, made, etc.,
- Particulars of related party transactions,
- Details of policy on risk management,
- Details of CSR activities ,
- Vigil mechanism and policy on appointment of senior management employees, etc.
- Technology absorption,
- Foreign exchange information etc.

LOAN TO DIRECTORS…..

Exemption Not Available:

- Exemption to private limited companies removed i.e. section applies to all companies
- Exemption for loan given to subsidiary company removed
- Section does not contain any remedial proviso (like approval of central govt.).

Exemption now available only for loans:

- Given to Managing Director (as part of service conditions or approved by special resolution)
- Company giving loans in ordinary course of business (i.e. NBFCs)
- Penalty of Rs. 5 lakhs to 25 lakhs and imprisonment of 6 months

LOAN TO DIRECTORS

Applicable on Public & Pvt. Companies: SECTION 185

LOAN & GUARANTEE (INCLUDING BOOK DEBTS & SECURITY)

- **No Company advances any loan to -** its director.
- **No Company advances any loan to -** director of the lending company, or of a company which is its holding company or any partner or relative of any such director.
- **No Company advance any loan to -** any firm in which any such director or relative is a partner;
- **No Company advance any loan to -** any private company of which any such director is a director or member;
- **No Company advances any loan to -** anybody corporate at a general meeting of which not less than twenty five per cent. of the total voting power may be exercised or controlled by any such director, or by two or more such directors, together; or
- **No Company advance any loan to –** any body corporate, the Board of directors, managing director or manager, whereof is accustomed to act in accordance with the directions or instructions of the Board, or of any director or directors, of the lending company.

LOAN TO DIRECTORS…..

- Section 186 (Corresponding section 372A): prohibits investments through more than 2 layers of investment companies;

  Exemption if the company acquires another company outside I**ndia and s**uch other company has investment subsidiaries beyond 2 layers;

- **Subject to compliance of sec 185 (ACID TEST)**, limit for loan or investments is higher of:

  60 % of paid up share capital, free reserves and securities premium

  or

  100 % of free reserves and securities premium

- If limit exceeded, prior approval of members by special resolution.

RELATED PARTY TRANSACTION

- Very detailed definition for RPT
- Definition more wider than AS 18 ‘Related Parties’
- Relative[2(77)]: means any one who is related to another if:
  a) They are members of a HUF;
  b) They are husband and wife or
  c) One person is related to another as prescribed

RELATED PARTY TRANSACTION

Related Party : means

- A director or KMP or his relative;
- Firm in which a director, manager or his relative is a partner;
- A private co. in which a director/manager is a director or holds alongwith his relatives, more than 2% of paid up share capital;
- Any body corporate whose BoD, MD is accustomed to act in accordance with the advice, directions or instructions of a director or manager; (other than in professional capacity)
- Any person on whose advice, directions or instructions, a director or manager is accustomed to act; (other than in professional capacity)
- Any company which is a holding, subsidiary or an associate company of such company or other persons as prescribed

RELATED PARTY TRANSACTION

LIST OF RELATIVES

- Father (including Step –Father)
- Mother (including Step – Mother)
- Son (including Step - Son
- Son’s wife
- Daughter.
- Daughter’s husband
- Brother (including Step – Brother)
- Sister: (including Step – Sister)

THANKS YOU FOR KEEPING PATIENCE

CS_SHRADDHA_SINGHI

Declaration: This presentation is my own piece of work, views have been obtained from Act, Rules, Forums, Newsletters etc