

# Sharda Ispat Ltd.

Regd. Off.: Kamptee Road, Nagpur - 44 00 26

Tel.: 0712 - 2245156, 2245888, | Email: shardaispat.ngp@gmail.com

Website: www.shardaispat.com | CIN No.: L74210MH1960PLC011830



Date: - 30.05.2024

To,  
The Department of Corporate Services,  
Bombay Stock Exchange Limited,  
1<sup>st</sup> Floor, New Trading Wing,  
Rotunda Building, P.J. Towers,  
Dalal Street, Fort,  
Mumbai -400001

## SHARDA ISPAT LIMITED

**SUB: Annual Secretarial Compliance Report – Financial Year 2023-24**  
**SCRIP CODE :-513548**

Sir/ Madam,

With reference to the captioned subject and in pursuance of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time, please find enclosed herewith Secretarial Compliance Report for the Year ended on March 31, 2024, issued by Sunil Kumar Sharma & Associates, Practicing Company Secretary, for your information and records.

Kindly requested you to take note of the above.

For **SHARDA ISPAT LIMITED**,

Amit B.Mundada  
Company Secretary &  
Compliance officer



Encl:- As above





**SUNIL KUMAR SHARMA & ASSOCIATES**

**Sunil Kumar Sharma**

**(Practicing Company Secretaries)**

**Phone No: +91-7709885236, +91-9309702402**

**Email: [cssunsharma7@gmail.com](mailto:cssunsharma7@gmail.com)**

**Off Add-2<sup>nd</sup> Floor Samarth Building Sona Restaurant Square C.A. Road Gandhibagh Nagpur-02MH**

**SECRETARIAL COMPLIANCE REPORT  
OF  
M/S. SHARDA ISPAT LIMITED  
FOR THE YEAR ENDED MARCH 31, 2024**

[Pursuant to Circular CIR/CFD/ CMDI/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

TO,  
M/S. SHARDA ISPAT LIMITED,  
CIN: L74210MH1960PLC011830  
KAMPTEE ROAD,  
NAGPUR (MS) 440026

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Sharda Ispat Limited (hereinafter referred as 'the listed entity'), having its Registered Office at Kamptee Road, Nagpur-440026. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and to provide my observations thereon. Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review. I hereby report that the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I have examined:

1. all the documents and records made available to us and explanation provided by M/s Sharda Ispat Limited (hereinafter referred to as "the listed entity"),
2. the filings/submissions made by the listed entity to the stock exchanges,
3. website of the listed entity,
4. any other document/filing, as may be relevant, which has been relied upon to make this report.

for the year ended 31<sup>st</sup> March, 2024 ("Review Period") in respect of compliance with the provisions of:





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- (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) The Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued thereunder, have been examined, include: -

- I. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- II. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements), Regulations, 2018; **(Not Applicable to the listed entity during the audit period);**
- III. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- IV. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the listed entity during the audit period);**
- V. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the listed entity during the audit period);**
- VI. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the audit period);**
- VII. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- VIII. Securities and Exchange Board of India (Depositories and Participants) Regulations 2018;
- IX. Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- X. Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable to the listed entity during the audit period);**

and circulars/guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:







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1. The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below: -

Compliance Requirements (Regulations/circulars/guidelines including specific clause)	The Listed Company has been submitted Financial Results for the Year/period ended 31 <sup>st</sup> March,2023 on 29/05/2023 i.e. date of Board Meeting, However, the Company has not submitted the Related Party Transaction in XBRL Mode for the Year/period ended 31 <sup>st</sup> March,2023.
Regulation/ Circular No.	Regulation 23 (9) Listing Obligations and Disclosure Requirements) Regulations, 2015
Deviations	Delay in furnishing the Related Party Transaction for the period half year ended 31 <sup>st</sup> March, 2023 on the date of publication of financial results.
Action Taken by	BSE Limited ("BSE")
Type of Action	Fine
Details of Violation	BSE Limited (BSE), vide Notice through e-Mail Communication, Ref. No. SOP-Review- June 2023 of Friday, the 30th June 2023, referring to SEBI SOP Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 Dated 22 January 2020 ('SEBI SOP Circular'), with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (LODR) Regulations, 2015 and Standard Operating Procedure to initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter, has observed that the Listed Entity is a Noncompliant / Late-compliant in respect of Regulation 23(9) of the SEBI (LODR) Regulations, 2015 - Delay in disclosure of related party transactions on consolidated basis.
Fine Amount	Fine of 15,000/- (Fifteen Thousand) Plus GST @18%, 2,700/- (Two Thousand Seven Hundred), Total Fine Payable is 17,700/- (Seventeen Thousand Seven Hundred).
Observations/Remarks of the	The Company has filed the Disclosure of Related





# SUNIL KUMAR SHARMA & ASSOCIATES

Sunil Kumar Sharma

(Practicing Company Secretaries)

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Practicing Company Secretary	Party Transactions in XBRL mode on 01 <sup>st</sup> June, 2023. There was a delay of three days in filing the disclosure. Further, on 15 <sup>th</sup> July, 2023 The Company has made payment of fine amounting Rs. 17,700/-.
Management Response	The Listed Entity and its Management had acknowledged the Notice through e-Mail Communication, Ref. No. SOP-Review- June 2023 of Friday, the 30 <sup>th</sup> June 2023 and remitted a Total Fine Payable 17,700/- (Seventeen Thousand Seven Hundred) [Fine of 15,000/- (Fifteen Thousand) Plus GST @18%, 2,700/- (Two Thousand Seven Hundred) vide RTGS UTR No. NGSBQ23196681657 Dated 15 <sup>th</sup> July 2023. The said compliance information has been duly intimated to BSE Limited through e-mail Dated 15 <sup>th</sup> July, 2023.
Remarks	No Specific Observation/s or Remark/s.

2. The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.

Compliance Requirements (Regulations/circulars/guidelines including specific clause)	Not applicable
Regulation/ Circular No.	
Deviations	
Action Taken by	
Type of Action	
Details of Violation	
Fine Amount	
Observations/Remarks of the Practicing Company Secretary	
Management Response	
Remarks	

(C). Based on my examination and verification of the documents and records produced to me and according to the information and explanations given to me by the Company, I report that: -

Sr. No	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<u>Secretarial Standards:</u>		





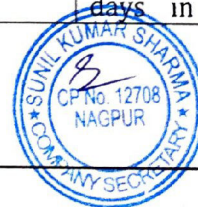
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	The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	None
2.	<u>Adoption and timely updation of the Policies:</u>  a. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company.  b. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI.	Yes	None
3.	<u>Maintenance and disclosures on Website:</u>  a. The Company is maintaining a functional website  b. Timely dissemination of the documents/ information under a separate section on the website  c. Web-links provided in annual corporate governance reports under Regulation 27 (2) are accurate and specific which redirects to the relevant document(s)/ section of the website.	Yes	None
4.	<u>Disqualification of Director:</u>  None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	Details related to Subsidiaries of listed entities have been examined with respect to: (a) Identification of material subsidiary companies  (b) Disclosure requirement of material as well as other subsidiaries	Yes	None
6.	<u>Preservation of Documents:</u>  The listed entity is preserving and maintaining records	Yes	None



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	as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7.	<b>Performance Evaluation:</b>  The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	None
8.	<b>Related Party Transactions:</b>  (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or  (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	None
9.	<b>Disclosure of events or information:</b>  The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	<b>Prohibition of Insider Trading:</b>  The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b>  No Actions taken against the Company/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder	No	The Company has filed the Disclosure of Related Party Transactions in XBRL mode on 01 <sup>st</sup> June, 2023. There was a delay of three days in filing







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			the disclosure. Further, on 15 <sup>th</sup> July, 2023 The Company has made payment of fine amounting Rs. 17,700/-.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	None

**Assumptions & limitation of scope and review:**

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Nagpur

Date: 29.05.2024



**SUNIL KUMAR SHARMA**

**Company Secretary**

**M. No.: 10043 C.P. No. 12708**

**UDIN: F010043F000477829**