



May 25, 2024

To,

**BSE Limited,**  
25<sup>th</sup> Floor, Phiroze  
Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai-400001

**BSE Scrip Code: 530025**

Dear Sir/Madam,

**Subject: Intimation regarding Submission of Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR), Regulations, 2015.**

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With reference to the captioned subject, we are enclosing herewith Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2024 issued by **M/s. Ajit Jain & Co., Practicing Company Secretary (COP NO.:2876, FCS NO.:3933)** in compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019.

You are requested to take the same on your records and confirm compliance.

Thanking You,  
Yours sincerely,

**For Samyak International Limited**

**Ujvala Churihar**  
**Company Secretary & Compliance Officer**

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CIN: L67120MH1994PLC225907

Corporate Office: N-38 Saket Nagar Indore MP 452001 IN Ph.: +91-731-4218481

Regd. Office: 203-B, 2<sup>nd</sup> floor, A wing, Millionaire Heritage, SV Road, Nr Station, Andheri(w) B/H Andheri Market Mumbai MH 400058

Email: [samyakinternationaltd@gmail.com](mailto:samyakinternationaltd@gmail.com), Website: <https://samyakinternational.in>

**SECRETARIAL COMPLIANCE REPORT OF SARTHAK INDUSTRIES LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2024**

*(Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015)*

I **Ajit Jain**, proprietor of **Ajit Jain & Co., Practicing Company Secretary** have examined:

(a) all the documents and records made available to us and explanation provided by **SAMYAK INTERNATIONAL LIMITED** (CIN: L67120MH1994PLC225907) ("*the listed entity*"),

(b) the filings/ submissions made by the listed entity to the stock exchanges,

(c) website of the listed entity,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

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

(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 thereunder by the Securities and Exchange Board of India ("SEBI");

*The specific regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, including:-*

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("*SEBI (LODR) Regulations, 2015*");

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (*To the extent of applicability to the Company*)

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*Not applicable to the listed entity during the Review Period*)



(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable to the listed entity during the Review Period)*

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *(Not applicable to the listed entity during the Review Period)*

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; *(Not applicable to the listed entity during the Review Period)*

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; *(Not applicable to the listed entity during the Review Period)*

and circulars/ guidelines issued thereunder;

We hereby report that, during the Review Period the Compliance status of the listed entity is appended below:

Pursuant to BSE Notice No. 20230316-14 dated March 16, 2023 and BSE Notice No. 20230410-41 dated April 10, 2023;

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
1.	<b><u>SECRETARIALSTANDARD</u></b>  The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None



2.	<p><b><u>ADOPTION AND TIMELY UPDATION OF THE POLICIES:</u></b></p> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entity.</li> <li>• All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI.</li> </ul>	<p>Yes</p> <p>Yes</p>	<p>None</p>
3.	<p><b><u>MAINTENANCE AND DISCLOSURES ON WEBSITE:</u></b></p> <ul style="list-style-type: none"> <li>• The listed entity is maintaining a functional website.</li> <li>• Timely dissemination of the documents/information under a separate section on the website.</li> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/section of the website.</li> </ul>	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>None</p>
4.	<p><b><u>DISQUALIFICATION OF DIRECTOR:</u></b></p> <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Listed entity.</p>	<p>Yes</p>	<p>None</p>
5.	<p><b><u>DETAILS RELATED TO SUBSIDIARIES OF LISTED ENTITIES W.R.T.</u></b></p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirements of material as well as other subsidiaries.</p>	<p>Yes</p> <p>Yes</p>	<p>The Company has two material subsidiaries as on 31.03.2024 namely Alpha Tar Industries Private Limited, Ketri Highway Developers Private Limited and one non-material subsidiary Digital Micron Roto Print</p>



			Pvt: Ltd. Thus disclosure requirements with Respect to the material subsidiary & Subsidiary has been made.
6.	<p><b><u>PRESERVATION OF DOCUMENTS:</u></b></p> <p>The listed entity is preserving and maintaining records 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.</p>	Yes	None
7.	<p><b><u>PERFORMANCE EVALUATION:</u></b></p> <p>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.</p>	Yes	None
8.	<p><b><u>RELATED PARTY TRANSACTIONS:</u></b></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(b) The listed entity has provided detailed reasons NA along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes  N.A.	None  The Company has taken prior approval of Audit Committee for all Related party transactions.
9.	<p><b><u>DISCLOSURE OF EVENTS OR INFORMATION:</u></b></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule I of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	Yes	None



10.	<p><b><u>PROHIBITION OF INSIDER TRADING:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	None
11.	<p><b><u>ACTIONS TAKEN BY SEBI OR STOCK EXCHANGE(S), IF ANY:</u></b></p> <p>No Action(s) has been taken against the listed entity/ 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.</p>	No	<p>Stock exchange imposed fine in the following matters:</p> <ol style="list-style-type: none"> <li>1. Non Compliance with constitution of Nomination &amp; Remuneration Committee for the Quarter ended June 2023.</li> <li>2. Non Compliance with the requirements pertaining to the composition of the Board including failure to appoint women director for the Quarter ended June 2023.</li> <li>3. Non Compliance with the requirements pertaining to the composition of the Board including failure to appoint women director for the Quarter ended September 2023.</li> </ol> <p><i>Note: The Company has made compliance</i></p>



			<i>in conformity with the above mentioned observations/remarks.</i>
12.	<p><b><u>ADDITIONAL NON-COMPLIANCES, IF ANY:</u></b></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.</p>	No	<p>1. Non filing of Initial &amp; Annul disclosure as per circular issued by time to time by Securities &amp; Exchange Board of India.</p> <p>2. Regulation 47(1) of SEBI (LODR) Regulations, 2015 - The company has not published the standalone and consolidated financial results for the quarter and year ended March 31, 2023 in the English newspaper and vernacular newspaper.</p> <p>3. Schedule B of sub regulation (1) of Regulation 9 of SEBI (Prohibition of insider trading) Regulation, 2015.</p>



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|  |  |  |  | <p>4. As per notices issued by BSE Limited time to time, the company has not submitted intimation of board meeting proposed to approve financial results in XBRL mode.</p> <p>5. Regulation 30 of SEBI (LODR) Regulation, 2015 - The Company has not disseminated the outcome of board meeting considering and approving quarterly &amp; financial result for March 31, 2023 within the period of Thirty (30) minutes from the conclusion of Board meeting as board meeting was concluded at 06.00 P.M. and outcome of board meeting has disseminated at 06.35 P.M.</p> |
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|  |  | <p>6. Regulation 6(1) of SEBI (LODR) Regulation, 2015 - The Company has not appointed Company Secretary/Compliance Officer during the period starting from 16th January, 2024 to till the end of the Financial Year 2024, as per the regulation of SEBI (LODR) Regulation, 2015.</p> <p>7. Regulation 31(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 - The shareholding of promoter(s) and Promoters group are not 100% in dematerialized form as required under Regulation 31(2) of SEBI (Listing Obligation and Disclosure Requirements)</p> |
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			Regulation, 2015.
			8. Regulation 14 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 - The company has delay in payment of listing fees for the FY 2023-2024 as company has paid the same with due interest on September, 01 <sup>st</sup> , 2023.

Compliances related to Resignation of Statuary Auditors from Listed Entities and their material subsidiaries as per SEBI circular CIR/CFD/CMD1/114/2019 dated October 18, 2019: Not applicable to the listed entity during the Review Period.



The Additional Disclosures of Annual Secretarial Compliance Report are as below:-

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

Sr. No.	Compliance Requirement (Regulations /circulars/guidelines Including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory /Clarification/ Fine/ Show Cause Notice/ Warning , etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 19(1)/19(2) of SEBI (LODR) Regulations, 2015	SEBI (LODR) Regulations, 2015	Non Compliance with constitution of Nomination & Remuneration Committee for the Quarter ended June 2023.	BSE INDIA LIMITED	Fine	The composition require ment of Nomination & Remuneration Committee was not	214760	The company has submitted affirmation as clarify that they complied said regulation and there was no non-compliance on their part, as	Management has applied for wavier of fine and clarify that there was no instance of said non-compliance.	By Perusal of Reports, disclosure and intimations of the company, it has found that there was no instance of non-compliance.



<p>2. Regulation 17(1A) of SEBI (LODR) Regulations, 2015</p>	<p>SEBI (LODR) Regulations, 2015</p>	<p>Non Compliance with the requirements pertaining to the composition of the Board including failure to appoint women director for the Quarter ended June 2023.</p>	<p>BSE INDIA LIMITED</p>	<p>Fine</p>	<p>Due to resignation of independent director from the company. There was Non Compliance with</p>	<p>283200</p>	<p>The company has submitted affirmation and reasoning that the company has due to resignation of independent director led vacancy and company was unable to find fit and proper</p>	<p>Management has applied for waiver of fine and take responsibility of non-compliance of composition of board. Further clarified</p>	<p>The company has taken major steps to ensure good corporate governance as well as ensured timely compliance of respective</p>	<p>compliance as the committee was properly constituted. The company has submitted Clarification on said levy of fine to Stock Exchange and also applied for waiver of fine and the response of said awaiting.</p>
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3.	Regulation 17(1A) of SEBI (LODR) Regulations, 2015	SEBI (LODR) Regulations, 2015	Non Compliance with the requirements pertaining to the composition of the Board including failure to appoint women director	BSE INDIA LIMITED	Fine	Due to resignation of independent director from the company. There was Non Compliance with	389400	The company has submitted affirmation and reasoning that the company has due to resignation of independent director led vacancy and company was unable to find fit and proper person for	that the company has already appointed non-executive women director since 2016 in continuation. Also the company has given affirmation for compliance of respective regulations.	regulations; also the company has appointed non-executive women director since 2016 in continuation. The company has taken major steps to ensure good corporate governance as well as ensured timely compliance of respective
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4.	Initial & Annual disclosure as per circular issued by time to time by Securities & Exchange Board of India.	SEBI Circulars	Non Submission of Initial & Annual disclosure for large corporate framework	PCS	Clarification	The company has not submitted initial disclosure within 30 days from the beginning of financial year	The company has already appointed non-executive women director since 2016 in continuation. Also the company has given affirmation for compliance of respective regulations.	that the company has already appointed non-executive women director since 2016 in continuation. Also the company has given affirmation for compliance of respective regulations.	regulations, also the company has already appointed non-executive women director since 2016 in continuation.
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5.	Regulation 47(1) of SEBI (LODR) Regulations, 2015.	SEBI (LODR) Regulations, 2015.	The company has not published the standalone & Consolidated financial results for the quarter and year ended March 31, 2023 in the English Newspaper & Vernacular Newspaper.	PCS	Clarification	The Company has not published the standalone and consolidated financial results for the quarter and year ended	year & Annual Disclosure within 45 days of the end of financial year for large corporate Framework as per requirement of SEBI circular.	ended 31.03.2023 for large corporate Framework.	--	Management has taken responsibility of said non-compliance and taken necessary steps to ensure such compliance for future course of action.	The company has not published the standalone and consolidated financial results for the quarter and year ended March 31, 2023 in the English news paper and vernacular newspaper.	--							
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<p>March 31, 2023 in the English newspa per having nationw ide circulati on and vernacul ar newspa per having wide circular in the state where the registre d office of the compan y is situated i.e. Maharas htra, as required under sub regulati on (1) of</p>			





6.	Schedule B of sub regulation (1) of Regulation 9 of SEBI (Prohibition of insider trading) Regulation, 2015	SEBI (Prohibition of insider trading) Regulation, 2015	The Company has not given intimation for restriction of trading period for the quarter and year ended March, 31 2023 within the timeline as mentioned under schedule B of sub regulation (1) of Regulation 9 of SEBI (Prohibition of insider trading) Regulation, 2015	PCS	Clarification	The Company has not given intimation for restriction of trading period for the quarter and year ended March, 31 2023 within the timeline as mentioned under schedule B of sub regulation (1) of Regulation 9 of SEBI (Prohibition of insider trading) Regulation, 2015.	The company has not given intimation for restriction of trading period for the quarter and year ended March, 31 2023 within the timeline as mentioned under schedule B of sub regulation (1) of Regulation 9 of SEBI (Prohibition of insider trading) Regulation, 2015.	Management has taken responsibility of said non-compliance and taken necessary steps to ensure such compliance for future course of action.	
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<p>on 9 of SEBI (Prohibition of insider trading) Regulation, 2015 as the intimation regarding the trading restriction on has given to exchange e simultaneously with the intimation of notice of board meeting proposed to approve financial results for the said period.</p>				



7.	As per notices issued by BSE Limited time to time the company has not submitted intimation of board meeting proposed to approve financial results in XBRL mode.	Notice issued by BSE Limited time to time	The company has not submitted intimation of board meeting proposes to consider & approve financial results for the quarter and year ended March 31, 2023 in XBRL mode with the stock exchange.	PCS	Clarification	The Company has not submitted Intimation for Board Meeting for consideration of Standalone & Consolidated financial Results for quarter and year ended March 31, 2023 in XBRL Mode with the Stock Exchange.	--	The Company has not submitted Intimation for Board Meeting for consideration of Standalone & Consolidated financial Results for quarter and year ended March 31, 2023 in XBRL Mode.	Management has taken responsibility of said non-compliance and taken necessary steps to ensure such compliance for future course of action.	--
8.	Regulation 30 of SEBI (LODR) Regulation, 2015	SEBI (LODR) Regulation, 2015	The Company has not disseminated the outcome of board meeting	PCS	Clarification	The Company has not disseminated the outcome of board meeting	--	The Company has not disseminated the outcome of board meeting	Management has taken responsibility of said non-compliance	--



		<p>considering and approving quarterly &amp; financial result for March 31, 2023 within the period of Thirty (30) minutes from the conclusion of Board meeting as board meeting.</p>		<p>nated the outcome of board meeting consider ing and approving quarterl y &amp; financial result for March 31, 2023 within the period of Thirty (30) minutes from the conclusi on of Board meeting as board meeting was conclud ed at 06.00 P.M. and outcome</p>		<p>meeting considering and approving quarterly &amp; financial result for March 31, 2023 within the period of Thirty (30) minutes from the conclusion of Board meeting as board meeting was concluded at 06.00 P.M. and outcome of board meeting has disseminated at 06.35 P.M.</p>	<p>compliance and taken necessary steps to ensure such compliance for future course of action.</p>
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9.	Regulation 6(1) of SEBI (LODR) Regulation, 2015	SEBI (LODR) Regulation, 2015	There was no Company Secretary/Compliance Officer during the period starting from 16th January, 2024 to	PCS	Clarification	There was no Company Secretary/Compliance Officer	of board meeting has disseminated at 06.35 P.M., however the disclosure regarding the same required to be given till 06.30 P.M. as per requirements of regulatory on 30 of SEBI (LODR) Regulation, 2015	The Company has not appointed Company Secretary/Compliance Officer during the	The Management has clarified that as per Regulation 6 (1A) of SEBI Listing	--
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10.	Regulation 31(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure	The Shareholding of Promoter (s) and Promoters group are not 100% in dematerialized form as required under SEBI (Listing Obligation and Disclosure



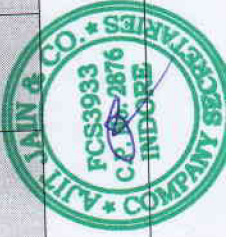
11.	Regulation 14 of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015	The company has delay in payment of listing fees as applicable, to the recognized stock within due timeline.	PCs	Clarification	The company has delay in payment of listing fees as require to be paid till April, 30,2023 for the financial year 2023-2024 as per Regulation on 14 of SEBI	The company has delay in payment of listing fees for the FY 2023-2024 as company has paid the same with due interest on September, 01 <sup>st</sup> ,2023.	Management has complied the same and paid the amount of listing fees with applicable rate of interest.	Regulation 31(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015.	to get their holding dematerialized.		



							(Listing Obligation and Disclosure Requirements) Regulation, 2015. However the company has paid the same with due interest on September, 01 <sup>st</sup> , 2023.					
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(b) The listed entity has taken the following action to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations /Circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory /Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks



--- Not Applicable ---



**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 certify 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.



**For Ajit Jain & Co.  
Company Secretaries**

*A. K. Jain*

**Ajit Jain  
(Proprietor)**

**COP NO.:2876, FCS NO.:3933**

**UDIN: F003933F000414631**

**Peer Review Certificate No.:767/2020**

**PCS Unique ID NO.: S1998MP023400**

**Place: Indore**

**Date: 21-05-2024**