

Shrikrishna

DEVCON LIMITED

www.shrikrishnadevconlimited.com

Date: 30-05-2024

To, BSE Limited

Phiroze Jeejeebhoy Towers,
Rotunda Bldg, Dalal Street,
Fort, Mumbai- 400 001

Scrip ID: SHRIKRISH, Scrip Code: 531080 & ISIN: INE997I01012

Dear Sir/ Madam,

Subject: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2024.

As per regulation 24A of the SEBI (LODR) Regulations, 2015, kindly find enclosed h/w the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2024.

This is for your information and record.

Thanking You,
Yours Faithfully

For, Shri Krishna Devcon Limited

Vikas Kumar Jain
Chief Financial Officer

Encl: a/a.

REGISTERED OFFICE: "SRI KRISHNA" Building, 8th Floor, 805/806, Opp. Laxmi Industrial Estate, New Link Road, Andheri(W), Mumbai-400053, MH, Ph.: +91 46082299, CIN No.: L67190MH1993PLC075295, Email: shrikrishnaelectra@hotmail.com, info@shrikrishnadevconlimited.com

INDORE OFFICE: MZ – 1 & 2, Starlit Tower, 29, Y N Road, Indore-452001, Madhya Pradesh, INDIA, Ph.: +91 731 4041485





B. K. Pradhan & Associates

Company Secretaries
M.Com, L.L.B, FCS

ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHRI KRISHNA DEVCON LIMITED FOR THE YEAR ENDED MARCH 31, 2024

[Under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
Shri Krishna Devcon Limited
CIN of Company: L67190MH1993PLC075295

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Shri Krishna Devcon Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at **Sri Krishna" 805/806, Opp Laxmi Industrial Estate, New Link Road, Andheri West, Mumbai - 400053** Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/ 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 **March 31, 2024** complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, Balkrishan Pradhan, proprietor of B. K. Pradhan & Associates has examined:

- all the documents and records made available to us and explanation provided by Shri Krishna Devcon Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity: <https://shrikrishnadevconlimited.com/>,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **March 31, 2024** ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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");





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

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **(Not applicable to the Listed Entity during the Review Period);**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (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 and Sweat Equity) Regulations, 2021 **(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 (Prohibition of Insider Trading) Regulations, 2015;
- (h) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder.

and based on the above examination, I hereby report that, during the Review Period:

- I. (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.	1.
Compliance Requirement (Regulations/ guidelines specific clause)	The listed company shall take special contingency insurance policy from the insurance company towards the risk arising out of the requirements relating to issuance of duplicate securities in order to safeguard and protect the interest of the listed company.
Regulation/ Circular No.	Para 5 of Circular No.: SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/70 dated May 25, 2022.
Deviations	No Policy taken.
Action Taken by	As informed, no action taken by any authority.





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Type of Action	Nil.
Details of Violation	No Policy taken.
Fine Amount	As informed, no fine levied.
Observations/ Remarks of the Practicing Company Secretary	The company is required to obtain special contingency insurance policy but the same was not taken.
Management Response	The company is under process of obtaining the same.
Remarks	-

Sr. No.	2.
Compliance Requirement (Regulations/ guidelines specific clause)	As per the provisions of Regulation 30(6) read with SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023, the listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twelve hours from the occurrence of event or information. Provided that in case the disclosure is made after twelve hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay.
Regulation/ Circular No.	Regulation 30(6) read with SEBI Circular SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023.
Deviations	The proceedings were submitted to the Stock Exchange beyond the prescribed time.
Action Taken by	As informed, no action taken by any authority.
Type of Action	Nil.
Details of Violation	The proceedings were submitted to the Stock Exchange beyond the prescribed time.
Fine Amount	As informed, no fine levied.
Observations/ Remarks of the Practicing Company Secretary	The company had made delayed submission of proceedings of the Annual General Meeting alongwith an explanation that the delay was inadvertent. Also, the Company has made a revised filing in reply to the e-mail received from BSE dated April 06, 2024.
Management Response	The has submitted the explanation for delay as required Regulation 30(6) to the stock exchanges.
Remarks	-

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	1.
Observations/ Remarks of the Practicing Company Secretary in the previous reports) (PCS)	The company is required to obtain special contingency insurance policy but the same was not taken.





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Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	March 31, 2023
Compliance Requirement (Regulations/ guidelines including specific clause)	The listed company shall take special contingency insurance policy from the insurance company towards the risk arising out of the requirements relating to issuance of duplicate securities in order to safeguard and protect the interest of the listed company as per Para 5 of Circular No.: SEBI/HO/MIRSD/MIRSD_RTAMB/P/CIR/2022/70 dated May 25, 2022.
Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	No Policy taken by the company. As informed, no action taken by any authority and no fine levied.
Remedial actions, if any, taken by the listed entity	Company has searched for the required insurance product and currently is under process of finalising the terms and conditions of the required policy with one insurance company and assured that the same will be obtained on immediate basis.
Comments of the PCS on the actions taken by the listed entity	The company has assured that the policy will be taken on immediate basis.

II. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
1.	Secretarial Standards: 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.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	None None





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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/information under a separate section on the websiteWeb-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	Yes Yes Yes	None None None
4.	Disqualification of Director: 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 w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	NA NA	Having only partnership firm as subsidiary and not company
6.	Preservation of Documents: 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.	Yes	None
7.	Performance Evaluation: 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.	Related Party Transactions: (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 NA	None Please refer point no. 8. (a)





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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS*
9.	Disclosure of events or information: 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.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11.	Actions taken by SEBI or Stock Exchange(s), if any: 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.	NA	No actions taken during the review period
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	There is no instance of resignation of auditor during the period under review





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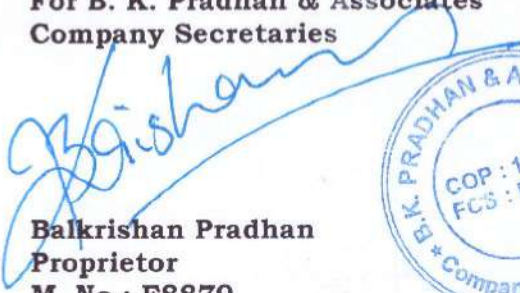
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Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
13.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/ circular/ guidance note etc.	No	During the year the company has not obtained Special Contingency Insurance Policy and the proceedings of the Annual General Meeting were submitted to the Stock Exchange beyond the prescribed time.

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 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 B. K. Pradhan & Associates
Company Secretaries


Balkrishan Pradhan
Proprietor
M. No.: F8879
C. P. No.: 10179



Firm Unique Identification No.: S2012MH172500
Peer Review Certificate No.: 2022/2022

UDIN: F008879F000500084
Date: 30/05/2024
Place: Mumbai