

STURDY INDUSTRIES LIMITED

CIN: L25209HP1989PLC009557; Email Id: legalsturdy@gmail.com

Registered Office: Plot Number 57, First Floor, Sector-1, Parwanoo, Solan Himachal Pradesh- 173220

Date: 30.05.2024

To

The Manager
Department of Corporate Services
Bombay Stock Exchange Limited
PJ Tower, Dalal Street,
Mumbai, Maharashtra-400001.

COMPANY CODE: 530611.

Subject: Submission of Secretarial Audit Compliance Report for the financial year ended 31st March, 2023 pursuant to Regulation 24(A) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Dear Sir/Madam,

Pursuant to Regulation 24(A) of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Secretarial Audit Compliance Report for the financial year ended 31st March, 2024 issued by the Practicing Company Secretary.

Kindly take on record the same and oblige.

Thanking You.

Yours Faithfully,

FOR STURDY INDUSTRIES LIMITED

RAMESH

KUMAR

GUPTA

RAMESH GUPTA

WHOLE TIME DIRECTOR

(DIN: 00161363).

Digitally signed by RAMESH KUMAR GUPTA
DN: cn=RAMESH KUMAR GUPTA, o=STURDY INDUSTRIES LIMITED, email=legalsturdy@gmail.com, c=IN, postalCode=173220, st=Himachal Pradesh, serialNumber=30984646235740e77626915c056de6801d
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Riya Garg & Associates

COMPANY SECRETARIES

(A Peer Reviewed Firm)

Registered office: 45/2, Near Anardana Chowk, Patiala Punjab 147001
Mobile Number: +91 90411-96150; Email Id: riyagarg1511@gmail.com

SECRETARIAL COMPLIANCE REPORT OF M/S. STURDY INDUSTRIES LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2024

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by M/s. **Sturdy Industries Limited** (CIN: L25209HP1989PLC009557) (hereinafter referred as 'the listed entity'), having its registered office at Plot Number 57, First Floor, Sector-1, Parwanoo, Solan Himachal Pradesh- 173220 and Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our 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, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

I, Riya Garg, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Sturdy Industries Limited ("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 report,

For the financial year ended 31st 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





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- (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, 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

Based on the above examination, I/We 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:
Details are enclosed as Annexure- 1
- (b) The listed entity has taken the following actions to comply with the observations made in previous reports:
Details are enclosed as Annexure- 2.





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II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

S. No.	Particulars	Compliance Status (Yes/No/ NA)	Observations/ Remarks by PCS*
1.	Compliances with the following conditions while appointing/reappointing an auditor:		
	<p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	Not Applicable.	The statutory auditors has not resigned during the financial year.
2.	Other conditions relating to resignation of statutory auditor		
	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p>	Not Applicable.	The statutory auditors has not resigned during the financial year.





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	<p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information/ explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in</p>		
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	accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.	Not Applicable.	The statutory auditors has not resigned during the financial year.

*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

III. I/we hereby report that, during the review period the compliance status of the listed entity is appended as below :

S. 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	No	The company is not complying with some of the secretarial standards as there is no Company Secretary in the company since 28 th May, 2022.
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.	No	The company has adopted the requisite policies. However, the same have not been updated from time to time.





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3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">• The Listed entity is maintaining a functional website.• Timely dissemination of the documents/information under a separate section on the website.• 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.	No	The company is maintaining a website, However, the same have not been adequately updated.
4.	Disqualification of Director: <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>	Yes	-
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: <ul style="list-style-type: none">(a) Identification of material subsidiary companies.(b) Disclosure requirement of material as well as other subsidiaries.	Not Applicable	The company has no material subsidiary.
6.	Preservation of Documents: <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	As per the representation letter received from the management is complying with the regulations of preserving and maintaining of documents.





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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	-
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	-
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.	No	The management has not made all the requisite disclosures under Schedule III, within the prescribed time limits.
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	The management could not produce the requisite record required to be maintained in Structural Digital Database.





Riya Garg & Associates

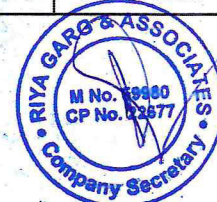
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11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).	Yes	The actions taken by SEBI or Stock Exchange(s) against the company are provided in separate paragraph 1(a) of this report as annexed to this report.
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	No	i. The company has not placed in a meeting of Board of Directors: 1. The non-compliances identified by the SEBI or Stock Exchange(s); 2. Subsequent action taken by the SEBI or Stock Exchange(s) in this regards. Hence, no comments/ action taken by the Board on the non-compliances were informed to the Stock Exchange for dissemination. ii. The company has not paid Annual Custodian fees to





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			<p>NSDL resulting the listing into -</p> <p>a) Suspended from trading on BSE Limited.</p> <p>b) Non Receipt of BENPOS for year ending 31st March, 2024 and hence not able to file the following:-</p> <ol style="list-style-type: none">1. Reconciliation of Share Capital Audit Report pursuant to Regulation 76 of SEBI (Depositories and Participants) Regulations, 1996;2. Certificate from Practicing Company Secretary for issuance of share certificates pursuant to Regulation 40(9) of the SEBI (LODR) Regulations, 2015;3. Shareholding pattern pursuant to Regulation 31 of the SEBI (LODR) Regulations, 2015; <p>iii. The company has</p>
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			not completed ERP process and update the KYC of their clients as prescribed under Rule 9(1a) of PML Rule (Maintenance of Records), 2005.
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Assumptions and 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.



PR No.: 3666/2023

Place: Chandigarh

Date: 30/05/2024

UDIN: A059980F000500970

RIYA GARG & ASSOCIATES
COMPANY SECRETARIES


RIYA GARG, ACS
COMPANY SECRETARY IN PRACTICE
M. NO.: 59980; C.P. NO.: 22677



ANNEXURE-1

(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:

S. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/Circular Number	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Appointment of Company Secretary and Compliance Officer.	Regulation 6(1) of (SEBI (LODR) Regulations, 2015.	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the company has not appointed Company Secretary till the closure of the financial year.	Stock Exchange	Fine	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the company follows: Q1: 1,07,380/- has not appointed Company Secretary till the closure of Q3: 1,08,560/- the financial year.	The BSE has imposed a fine on the listing entity for quarters mentioned as follows: Q1: 1,07,380/- Q2: 1,08,560/- Q3: 1,08,560/-	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the said vacancy was required to be filled within six months from the date of resignation. However, the company has not appointed Company Secretary till the closure of the financial year.	Efforts are being made to appoint a wholetime Company Secretary. However, since the company is in losses, no suitable candidate accepts the offer of appointment.	Nil.
2.	Submission of disclosures related party transactions.	Regulation 23(9) of (SEBI (LODR) Regulations, 2015.	Non-submission of details of related party transactions for the half year ended 30th September, 2023.	Stock Exchange.	Fine	Non-submission of details of related party transactions for the half year ended 30th September, 2023.	The BSE has served non-compliance letter to the listing entity and imposed a fine as mentioned below: September, 2023- Rs. 1,88,800/- on December 14, 2023	The disclosure of related party transactions for the half year ended 30 th September, 2023 was required to be on the date of publication of financial results. However, said disclosure was not made by the management.	Since the company had not entered into any transaction with the related party during the half year ended 30 th September, 2023, therefore, the management was of opinion that the disclosure under specified Regulation 23 (9) of (SEBI	Nil.



(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:

					and Rs. 2,95,000/- on January, 01, 2024.		(LODR) Regulations, 2015 was not required to be submitted.	
1.	Closure of Trading Window	Clause 4(2) of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.	Delay in Closure of Trading Window.	Nil	Nil	Delay in Closure of Trading Window for the Q 3 and 4.	The management has taken note of the same so that the requisite compliance can be made.	Nil.
	Maintenance of functional website.	Regulation 46 and 62 of (SEBI (LODR) Regulations, 2015.	Non-dissemination of requisite information on the website of the company.	Nil	Nil	The company has not disseminated adequate information specified in Regulation 46 and 62 of (SEBI (LODR) Regulations, 2015 on its website.	The management is in the process of updating the requisite information on its website.	Nil.
	Disclosure of encumbered shares.	Regulation 31(4) of (SEBI (SAST) Regulations, 2011.	Non-submission of declaration of encumbrance of shares.	Nil	Nil	The promoters have not given the yearly declaration with respect to encumbrance of shares, directly or indirectly, other than those already disclosed during the financial year as specified under Regulation 31(4) of (SEBI (SAST) Regulations, 2011.	The management has taken note of the same so that the requisite compliance can be made and filed the same on 11.05.2023 during the financial year under review.	Nil.



(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:

Shareholding of promoter(s) and promoter group in dematerialized form.	Regulation 31(2) of (SEBI (LODR) Regulations, 2015.	The 100% shareholding of the promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	Nil	Not Applicable	The 100% shareholding of the promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	Nil	The 100% shareholding of the promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	The 100% shareholding of the promoters is held and maintained in demat form. However, the shareholding of some members of the promoters group is not held in demat form since these members are Initial subscribers and presently are not active, hence no communication can be made with them. The management has taken note of the same so that the requisite compliance can be made.	Nil.
Certificate confirming the payment of interest/ dividend/ principal obligations for non-convertible securities.	Regulation 57 of (SEBI (LODR) Regulations, 2015.	Non-submission of certificate with respect to payment of interest/ dividend/ principal obligations for non-convertible securities.	Nil	Not Applicable	Non-submission of certificate with respect to payment of interest/ dividend/ principal obligations for non-convertible securities.	Nil	The company has delayed in submitting the certificates with respect to payment of interest/ dividend/ principal obligations for non-convertible securities as specified under Regulation 57 of SEBI (LODR) Regulations, 2015.	The management has taken note of the same so that the requisite compliance can be made.	Nil.



(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:

1.	Advertisement in Newspapers.	Regulation 47 of (SEBI (LODR) Regulations, 2015.	The financial results of the company (both quarterly and annual) were published in one English language local newspaper circulating in the region where the registered office of the listed entity is situated.	Nil	Not Applicable	The financial results of the company (both quarterly and annual) were published in one English language local newspaper circulating in the region where the registered office of the listed entity is situated.	Nil	The financial results, as specified in Regulation 33, alongwith the modified opinion(s) or reservation (s), if any, were required to be published in atleast one English language national and one daily newspaper circulating in the whole or substantially the whole of India. Whereas, the same has not been published in last two quarters of the financial statement.	The management has taken requisite compliance can be made.	Nil.
1.	Minimum Promoter Shareholding.	SEBI (ICDR) Regulations, 2018.	Non maintenance of minimum promoter shareholding in the company.	Nil	Not Applicable	Non-maintenance of minimum promoter shareholding in the company.	Nil	The minimum promoter shareholding of the company had fallen below the limit prescribed under SEBI (ICDR) Regulations, 2018.	The management has taken note of the same so that the requisite compliance can be made.	Nil
0	SDD Compliant Company	Non-Regulation 3(6) & SEBI (Prohibition of Insider Trading) Regulations, 2015.	The company has been declared as SDD non-compliant on the BSE Stock exchange.	Nil	Not Applicable	The company has been declared as SDD non-compliant on the BSE Stock exchange.	Nil	The company has been declared as SDD non-compliant on the website of the Bombay Stock Exchange.	The management will take necessary actions so that the requisite compliance can be made.	Nil

[Handwritten Signature]



ANNEXURE-2

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

S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/Circular Number	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Appointment of Company Secretary and Compliance Officer.	Regulation 6(1) of (SEBI (LODR) Regulations, 2015.	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the company has not appointed Company Secretary till the closure of the financial year.	Stock Exchange	Fine	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the company has not appointed Company Secretary till the closure of the financial year.	Rs. 1,06,200	The Company Secretary of the company had resigned with effect from 28 th May, 2022 and the said vacancy was required to be filled within six months from the date of resignation. However, the company has not appointed Company Secretary till the closure of the financial year.	Efforts are being made to appoint a Company Secretary. However, since the company is in losses, no suitable candidate accepts the offer of appointment.	Yet to appoint Wholetime Company Secretary.
2.	Reclassification of Promoter/Group shareholders as Public category shareholders.	Regulation 31(a) of (SEBI (LODR) Regulations, 2015.	Delay in submission of application for reclassification of Promoter/Group shareholders as Public category shareholders with the stock exchange.	Stock Exchange.	Fine.	Delay in submission of application for reclassification of Promoter/Group shareholders as Public category shareholders with the stock exchange.	Rs. 6,43,100	An application for reclassification of Promoter/Group shareholders as Public category shareholders was said application is pending to be made by the listed entity to the stock exchange within thirty days from the date of approval by shareholders in general meeting. However, the said application was not	Due to non-availability of funds, the fine imposed by the Stock Exchange could not be paid. Hence, the application for reclassification of the non-payment of the fine imposed and documents filed with Bombay Stock Exchange.	Stock Exchange has closed the application due to non-payment of the fine imposed and documents filed with Bombay Stock Exchange.



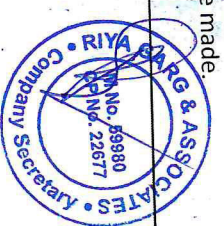
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

								submitted by the company with the stock exchange within the requisite period.		
3.	Submission of disclosures related party transactions.	off Regulation 23 of (SEBI) (LODR) Regulations, 2015.	Non-submission of details of related party transactions for the half year ended 30 th September, 2022.	Stock Exchange.	Fine.	Non-submission of details of related party transactions for the half year ended 30 th September, 2022.	Rs. 6,51,360	The disclosure of related party transactions for the half year ended 30 th September, 2022 was required to be made within 15 days from the date of publication of financial results. However, said disclosure was made on 16 th January, 2023 after receipt of notice from the stock exchange.	Since the company had not entered into any transaction with the related party during the half year ended 30 th September, 2022, the disclosure was not required to be made with the stock exchange. However, management was of opinion that the disclosure specified under Regulation 23 of (SEBI) (LODR) Regulations, 2015 was not required to be submitted. However, on advice of professionals the said disclosure was submitted by the company with the stock exchange.	The company has filed the requisite disclosure with the stock exchange.
4.	Maintenance of functional website.	off Regulation 46 and 62 of (SEBI) (LODR) Regulations, 2015.	Non-dissemination of information on the website of the company.	Nil	Not Applicable.	Non-dissemination of information on the website of the company.	No fine has been imposed.	The company has not disseminated the information specified in Regulation 46 and 62 of (SEBI) (LODR) Regulations, 2015 on its website.	The management is in the process of updating the website.	Due to financial crunches the management is unable to pay the professional fee for maintaining the website.



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

5.	Disclosure of encumbered shares.	Regulation 31(4) of (SEBI (SAST) Regulations, 2011.	Non-submission of declaration of encumbrance of shares.	Nil	Not Applicable	Non-submission of declaration of encumbrance of shares.	No fine has been imposed.	The promoters have not given the yearly declaration with respect to encumbrance of shares, directly or indirectly, other than those already disclosed during the financial year as specified under Regulation 31(4) of (SEBI (SAST) Regulations, 2011.	The management has taken the note of the same so that the requisite compliance can be made.	The management has filed the same on 11.05.2023 with stock exchange.
6.	Shareholding promoter(s) and of promoter group dematerialized form.	Regulation 31(2) of (SEBI (LODR) Regulations, 2015.	The shareholding of promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	100% Stock Exchange.	Notice.	The shareholding of promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	No fine has been imposed.	The 100% shareholding of promoters and promoters group in not held in dematerialized form and the same is not maintained on a continuous basis.	The 100% shareholding of promoters is held and maintained in demat form. However, the shareholding of some members of the promoters group is not held in demat form since these members are Initial subscribers and presently are not active, hence no communication can be made with them. The management has taken note of the same so that the requisite compliance can be made.	The management is still under the process to get the shares of promoter dematerialize.
7.	Certificate confirming the payment of interest/dividend/ principal	Regulation 57 of (SEBI (LODR) Regulations, 2015.	Non-submission of certificate with respect to payment of interest/dividend/ principal	Nil	Not Applicable	Non-submission of certificate with respect to payment of interest/dividend/ principal	No fine has been imposed.	The company has not submitted the certificates with respect to payment of interest/dividend/ principal for non-	The management has taken the note of the same so that the requisite compliance can be made.	The management has taken care to abide with the said



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

	obligations for non-convertible securities.		principal obligations for non-convertible securities.			obligations for non-convertible securities.		convertible securities as specified under Regulation 57 of (SEBI (LODR) Regulations, 2015.		SEBI regulations.
8.	Submission and preparation of financial results.	Regulation 33 of (SEBI (LODR) Regulations, 2015.	Non-submission of statement of audit qualification with the stock exchange along with financial results for the year ended 31 st March, 2022.	Stock Exchange.	Notice.	Non-submission of statement of impact of audit qualification with the stock exchange along with financial results for the financial year ended 31 st March, 2022.	Nil.	Non-submission of statement of impact of audit qualification with the stock exchange along with financial results for the financial year ended 31 st March, 2022.	The company had submitted the financial results for the year ended 31 st March, 2022 within the requisite time, but inadvertently the statement of impact of audit qualification could not be submitted along with the financial results. The management has ensured to be more vigilant in future.	Due to non-availability of qualified Company Secretary, the listed entity was not able to abide
9.	Advertisement in Newspapers.	Regulation 47 of (SEBI (LODR) Regulations, 2015.	The financial results of the company (both quarterly and annual) were published in one English language local newspaper circulating in the region where the registered office of the listed entity is situated.	Nil	Not Applicable	The financial results of the company (both quarterly and annual) were published in one English language local newspaper circulating in the region where the registered office of the listed entity is situated.	No fine has been imposed.	The financial results, as specified in Regulation 33, along with the modified opinion(s) or reservation(s), if any, were required to be published in at least one English language national daily newspaper circulating in the whole or substantially the whole of India. Whereas, the same has been published in one English language local daily newspaper.	The management has taken note of the same so that the requisite compliance can be made.	Due to financial crunches the management is unable to pay the fee/charges for newspaper advertisement.



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

10.	Minimum Promoter Shareholding.	SEBI (ICDR) Regulations, 2018.	Non-maintenance of minimum promoter shareholding in the company.	Nil	Not Applicable	Non-maintenance of minimum promoter shareholding in the company.	No fine has been imposed.	The minimum promoter shareholding of the company had fallen below the limit prescribed under SEBI (ICDR) Regulations, 2018.	Due to the sale of shares held under pledge by the bank the minimum promoter shareholding had fallen below the limit prescribed under SEBI (ICDR) Regulations, 2018. The management has taken note of the same so that the requisite compliance can be made.	Due to the breakdown in the company the entity is listed to comply with the minimum maintenance of promoters shareholding.
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Riya Garg