

SHASHIJIT INFRAPROJECTS LIMITED

Construction Engineers
ISO 9001:2015 Certified



30th May, 2023

To,
The Department of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

Scrip Code : 540147
Security ID : SHASHIJIT

Dear Sir/Madam,

Sub : Secretarial Compliance Report for the year ended March 31, 2023
Ref : Regulation 24A of SEBI (LODR) Regulations, 2015

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 and SEBI Circular No. CIR/CFD/CMD1/114/2019 dated 18th October, 2019, please find attached herewith the Secretarial Compliance Report dated 30th May, 2023 for the year ended 31st March, 2023, issued by Mr. Nitesh P. Shah, Practicing Company Secretary.

We request you to take the above on record and disseminate the same on your website.

Thanking you.

Yours sincerely,

For SHASHIJIT INFRAPROJECTS LIMITED

MANTHAN

DINESHKUMAR SHAH

Digitally signed by MANTHAN
DINESHKUMAR SHAH
Date: 2023.05.30 18:09:39 +05'30'

(Manthan D. Shah)
Company Secretary and Compliance Officer
M. NO. 42509 of ICSI

Encl. as above

Nitesh P. Shah

A.C.S.

COMPANY SECRETARY

C-604, SHASHWAT SKYZ, NEAR AMBALAL PARK,
MAHAVIR NAGAR, SABARMATI, AHMEDABAD-380005.
(M) 09429213780 E-mail : niteshshah16@gmail.com

**Secretarial compliance report of SHASHIJIT INFRAPROJECTS LIMITED (CIN:
L45201GJ2007PLC052114) for the year ended 31st March, 2023**

I have examined:

(a) all the documents and records made available to me and explanation provided by SHASHIJIT INFRAPROJECTS 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 certification,

for the year ended 31st March, 2023 ("Review Period") in respect of compliance with the provisions of:

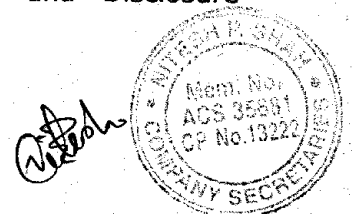
(a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

(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 there under, 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 (Buyback of Securities) Regulations, 2018;
Not Applicable to the Company during the review period

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the review period**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during the review period**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable to the Company during the review period**

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

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

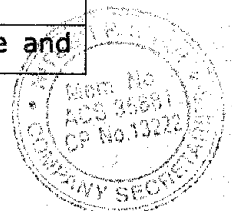
and circulars/ guidelines issued there under;

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

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

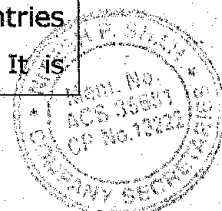
Sr No	1
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015.
Regulation/Circular No	Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015.
Deviations	The Company had shared UPSI to Audit Committee and

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	the Board of the Directors of the Company for the legitimate purpose in the months of May, 2022 but the entry was made in the Structured Digital Database in the month of August, 2022.
Action Taken by Company	The Company has made entry in the Database immediately on becoming aware of such non compliance. Thus, the Company has complied with the provisions of Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015.
Type of Action (Advisory / Clarification/ Fine /Show Cause Notice/ Warning, etc.)	Not Applicable
Details of Violation	Violation of Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015
Fine Amount	Nil
Observations/ Remarks of the Practicing Company Secretary	As the Company did not make entry in the Structured Digital Database prior to Sharing of the USPI thus, the Company has made violation of Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015
Management Response	The Management of the Company has responded that the Company had made entry in the Structured Digital Database prior to the sharing of information to the Audit Committee and the Board of Directors of the Company respectively but due to some technical issue unknown to us in the Structured Digital Database Software, the entry was not recorded and the Management of the Company was under bonafied belief that the entry has been made and recorded in the database. When the Company became aware of such violation, the Company made entry immediately in the database and made compliance of the regulation. Thus, the Company has complied with the provisions of Regulation 3(5) of the SEBI (prohibition of Insider Trading) Regulations, 2015. The management further responded that the Company has made all the entries of Sharing of UPSI in the Structured Digital Database during the year except the aforesaid two entries which were due to the reason beyond our control. It is

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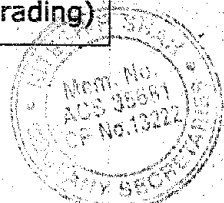


	further stated that there was no malafide intention of the Company and the Company has complied with the aforesaid regulation immediately on becoming aware of the violation.
Remarks	The Required action has been taken by the Company to rectify the violation as aforesaid made by the Company.

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

Sr No	1
Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Pursuant to Clause 4 of Annexure A of SEBI Circular No: SEBI/HO/ISD/ISD/CIR/P/2020/168 dated 09 th September, 2020, every Listed Company is required to update the changes in the information of Promoter(s) including member(s) of the promoter group, designated person(s) and director with the Designated Depository on the same day.
Regulation/Circular No	SEBI/HO/ISD/ISD/CIR/P/2020/168 dated 09 th September, 2020
Deviations	The Company had not updated the changes in the information of the designated persons with the designated depository on the same day.
Action Taken by Company	The Company has updated the changes in the information of the designated persons with the designated depository.
Type of Action (Advisory / Clarification/ Fine /Show Cause Notice/ Warning, etc.)	Not Applicable
Details of Violation	The Company had not updated the changes in the information of the designated persons with the designated depository on the same day.
Fine Amount	Not Applicable
Observations/ Remarks of the Practicing Company Secretary	During the Financial Year 2021-22, there had been a change in the Designated Persons as determined pursuant to the provisions of SEBI (Prohibition of Insider Trading)

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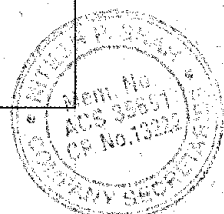
	Regulations, 2015 but the Listed Company had not updated the same with the designated depository on the same day as required pursuant to Clause 4 of Annexure A of SEBI Circular No: SEBI/HO/ISD/ISD/CIR/P/2020/168 dated 09 th September, 2020.
Management Response	The Management has responded that the aforesaid violation was made due to oversight and without any malafide intention on the part of the Company. It is further stated that the Company has complied with the aforesaid violation immediately on becoming aware of it.
Remarks	The Required action has been taken by the Company to rectify the violation as aforesaid made by the Company.

(c) The reporting of clause 6(A) and 6(B) of the circular No: CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.

Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR)

Sr No	Particulars	Compliance Status (Yes/No)	Observations/ Remarks by PCS
1.	<p><u>Secretarial Standard:</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	
2.	<p><u>Adoption and Timely updation of the Policies:</u></p> <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 has 	Yes	

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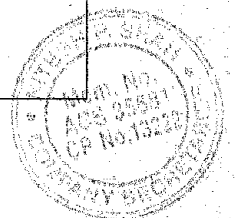
	been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI		
3.	<p><u>Maintenance and disclosures on Websites:</u></p> <ul style="list-style-type: none"> The Listed entity is maintaining a functional website. Timely dissemination of the documents/ information under a separate section on the website. Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website 	Yes	
4.	<p><u>Disqualification of Directors:</u></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	
5.	<p><u>To examine details related to Subsidiaries of listed entities:</u></p> <ul style="list-style-type: none"> a) Identification of material subsidiary companies. b) Requirements with respect to disclosure of material as well as other subsidiaries 	Not Applicable	
6.	<p><u>Preservation of Documents:</u></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</p>	Yes	

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	LODR Regulations, 2015		
	<u>Performance Evaluation:</u>		
7.	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	
	<u>Related Party Transactions:</u>		
8.	a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee	Yes	
	<u>Disclosure of events or information:</u>		
9.	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	
	<u>Prohibition of Insider Trading:</u>		
10.	The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	No	As stated in clause (a) above
	<u>Actions taken by SEBI or Stock Exchange(s), if any:</u>		
11.	No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges	Yes	


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	(including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder		
12.	<u>Additional Non-compliances, if any:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	

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.

Signature : 
Name of the Practicing
Company Secretary : Nitesh Parasmal Shah
ACS No : A35681
C. P. No : 13222
PR : 746/2020
UDIN : A035681E000423772
Place : Ahmedabad
Date : 30th May, 2023

