



SHAKTI PRESS LIMITED

MULTICOLOR OFFSET PRINTERS, PACKAGER & STATIONERS



May 30, 2024

The Deputy Manager
Department of Corporate Services
BSE Limited
P. J. Towers, Dalal Street, Fort
Mumbai – 400 001

Ref: **Scrip Code BSE-526841**

Sub: **Submission of Annual Secretarial Compliance Report**

Respected Sir or Madam,

With reference to the above captioned subject matter and pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/ 2019 dated 8 February 2019; we are forwarding herewith Annual Secretarial Compliance Report for the Financial Year 2023-24.

Kindly take the same on your record & oblige.

Thanking You,

Yours Faithfully,

For **SHAKTI PRESS LIMITED**

RADHIKA KHANDELWAL
M. NO. 65301
(Company Secretary)

Regd. Off. & Works : Plot No. 49, Khasra No. 69, Kanholibara Road, Vill-Mondha,
Tah. Hingna, Dist. Nagpur - 441 110

Mob.: 9371162925 | 9130004573

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**Jain
Paranjape
& Associates**
Company Secretaries

207, 2nd Floor, Crystal Plaza, Beside KRIMS Hospital, 276, Central Bazar Road,
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To
Board of Directors
Shakti Press Limited
Nagpur

Sub.: Annual Secretarial Compliance Report for the Financial Year 2023-24

Dear Sir,

We have been engaged by M/s. Shakti Press Limited (hereinafter referred to as the "Company") bearing CIN: L22219MH1993PLC071882 whose Equity Shares are listed on BSE Limited (BSE to conduct an Audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019 including recent update by SEBI on said Circular, and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to keep records, devise proper systems to ensure Compliance with the provisions of all the applicable SEBI Regulations and Circulars/Guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify Compliance by the Company with the provisions of all applicable SEBI Regulations and Circulars/Guidelines issued from time to time and issue a Report thereon.

Our Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications considered and necessary and adequate for the said purpose. Annual Secretarial Compliance is attached herewith.

For Jain Paranjape & Associates

CS Akshay Paranjape

Partner

FCS No: 9998, CP No: 12812

PR No: 2214/2022

Date: May 30, 2024

Place: Nagpur



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**Secretarial Compliance Report of SHAKTI PRESS LIMITED for the financial year ended
2023-24**

To,
The Members of Shakti Press Limited
Plot no.49, Khasra no. 69, Kanholibara Road
Vill – Mondha, Tah. Hingna
Nagpur – 441 110

We have examined:

- (a) all the documents and records made available to us and explanation provided by Shakti Press Limited,
- (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 2023-24 (“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 SEBI;

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

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable for the period**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Not Applicable for the period**

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable for the period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable for the period**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **Not Applicable for the period**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Not Applicable for the period**
- (h) other regulations as applicable.

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

- (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:

Please Refer to Annexure A

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

The company was relisted on the exchange in the financial year 2023-2024. The company was non-compliant with the SEBI regulations and failed to update its filing with the exchange since the financial year 2020-2021. The company in the process of relisting has complies with all its pending compliances. Hence information with compliance with the observation of previous audit reports id not provided.

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

Sr. No.	Particulars	Compliance Status	Observations / Remarks
1.	<p>Secretarial Standards:</p> <p>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).</p>	Yes	
2.	<p>Adoption and timely updation of the Policies:</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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI. 	Yes	All policies were formed as per the relisting procedure conducted by the company.
3.	<p>Maintenance and disclosures on Website:</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	The company has delayed in uploading the relevant information on its website.
4.	<p>Disqualification of Director(s):</p> <p>None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	Yes	

5.	<p>Details related to subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Disclosure requirement of material as well as other subsidiaries.</p>	Not Applicable	
6.	<p>Preservation of Documents:</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	
7.	<p>Performance Evaluation:</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	
8.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of audit committee for all related party transactions;</p> <p>(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.</p>	Yes	The company does not need to form Audit committee as per SEBI LODR Regulations, 2015. The related party transactions are approved the Board of Directors
9.	<p>Disclosure of events or information:</p> <p>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.</p>	Yes	
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	

11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	Yes	<p>The company was relisted on the exchange in the financial year 2023-2024. The company was non-compliant with the SEBI regulations and failed to update its filing with the exchange since the financial year 2020-2021. The company in the process of relisting has complies with all its pending compliances.</p>
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>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.</p>	Not Applicable	
13.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	Yes	<p>The exchange has sought clarifications and additional documents regarding the following:</p> <ol style="list-style-type: none"> 1. Appointment and resignation of the company Secretary. 2. Clasification of the promoters in the shareholdng data provided by

			the company. The company is in process of submitting the clarification.
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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.

For Jain Paranjape & Associates

CS Akshay Paranjape

Partner

FCS No: 9998, CP No: 12812

PR No: 2214/2022

UDIN: F009998F000502028

Date: May 30, 2024

Place: Nagpur

Annexure A

Sr. No.	Compliance Requirement (Regulations/circulars /guidelines including specific clause)	Regulation/ Circular No.	Deviations	Type of Action (Advisory/ Clarification/Fine/ Show Cause Notice/Warning etc.)	Detail of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary(PCS)	Management Response	Remarks
1.	Disclosure of appointment of company secretary	SEBI Circular no. SEBI/HO/CFD/CFD-PoD-1/P/CIR/2023/123 dated July 13, 2023	Announcement not according to regulation 30 of LODR Regulations	Resubmission of corporate announcement with additional information	NA	NA	Not yet resolved.	Resubmission of the Corporate Announcement is in progress.	
2.	Delay in furnishing prior intimation about the meeting of the board of directors for the month of February, 2024	Regulation 29(2)/29(3)	Delay in furnishing intimation of Board meeting.	Fine levied	Delay in furnishing intimation of Board meeting.	11800	Paid	Paid	
3.	Discrepancies in shareholding pattern for the Quarter ended December , 2023	Regulation 31	Reclassification of promoter shares	Rectification sought	Classification of Promoters not as	NA	Shareholding uploaded as per the data received from the RTA	Details sought from the RTA and correct data shared	

			without approval of the exchange		per previous reporting . Change not approved by the exchange			with the RTA	
4.	SDD compliances	Regulation 3(5) of the PIT regulations, 2015	Non Compliance	Non-Compliances	Non-compliance	NA	Complied for the Quarter ended March, 2024	The company has established a proper mechanism for disclosure and monitoring of price sensitive information.	
5.	Non-submission of shareholding pattern within the period prescribed	Regulation 31	Delayed Submission	Penalty levied for delayed submission	Late submission	14160	Compliance completed	Fine paid	
6.	Non-submission of the statement on shareholder complaints within the period prescribed under this	Regulation 13(3)	Delayed Submission	Penalty levied for delayed submission	Late submission	44840	Compliance completed	Fine paid	