

# SARTHAK INDUSTRIES LIMITED

CIN: L99999MH1982PLC136834

Regd. Office: ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (Maharashtra)  
400009, Phone: 022 23486740, Email: [sarthakindustries@yahoo.in](mailto:sarthakindustries@yahoo.in), website: [www.sarthakindustries.com](http://www.sarthakindustries.com)

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11<sup>th</sup> June, 2020

To,

**The BSE Limited**  
**25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers,**  
**Dalal Street, Fort,**  
**Mumbai-400 001**

Dear Sir/ Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year Ended 31<sup>st</sup> March, 2020**  
**under Regulation 24A of SEBI (LODR) Regulations, 2015.**

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019; please find attached herewith the "Annual Secretarial Compliance Report" for the Financial Year ended 31<sup>st</sup> March, 2020 issued by Ajit Jain & Co., Company Secretaries, Indore.

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

Thanking you,

Yours sincerely,  
**For Sarthak Industries Limited**



**Amit Jain**  
**Company Secretary**

**Secretarial compliance report of SARTHAK INDUSTRIES LIMITED for  
the year ended 31.03.2020**

(Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February, 08, 2019)

We AJIT JAIN & CO., PRACTICING COMPANY SECRETARY have examined:

- (a) all the documents and records made available to us and explanation provided by SARTHAK INDUSTRIES LIMITED (CIN: L99999MH1982PLC136834) ("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, 2020 ("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, 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 DURING REVIEW PERIOD)
  - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (NOT APPLICABLE DURING REVIEW PERIOD)
  - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (NOT APPLICABLE DURING REVIEW PERIOD)
  - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (NOT APPLICABLE DURING REVIEW PERIOD)
  - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - (i) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 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:-

Sr. No	Compliance Requirement Regulations/ guidelines /guidelines specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
NIL			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records.

- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NIL				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial compliance Report for the year ended...--	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable-- No observations were made in previous report for the year ended 31 <sup>st</sup> March, 2019				

Place: Indore  
Date: 10.06.2020

For Ajit Jain & Co., Company Secretaries



A. K. Jain

CS Ajit Jain (Proprietor)

FCS No.: 3933

C. P. No.: 2876

UDIN: F003933B000332327