



**SHARIKA ENTERPRISES LIMITED**

An ISO 9001: 2015 certified Company

CIN No.: L51311DL1998PLC093690

B -124, Sector-67, Noida 201 301, India

Tel: +91 120 2593900 Fax: +91 120 2484620

Email: [info@sharikaindia.com](mailto:info@sharikaindia.com) • [www.sharikaindia.com](http://www.sharikaindia.com)

**SEL/SE/2023-24/MAY/06**

**May 26, 2023**

The Manager (Listing)  
Bombay Stock Exchange limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai-400 001

**Scrip Code: 540786**

**Sub: Annual Secretarial Compliance Report for the year ended March 31, 2023.**

Dear Sir(s),

Pursuant to Regulation 24A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, as amended, we are attached herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2023.

You are requested to take the same on your record.

Thanking You,  
Yours Faithfully,

For **Sharika Enterprises Limited,**

**Rajinder Kaul**  
**Managing Director**  
**DIN: 01609805**

**Place: Noida**



# Jaivindra Singh & Associates

(Company Secretaries & Trademark Agents)

(A Peer-Reviewed PCS Firm)

## Secretarial Compliance Report of M/s SHARIKA ENTERPRISES LTD for the year ended 31<sup>st</sup> March 2023

We, *Jaivindra Singh & Associates*, Company Secretaries having *FRN (Firm Unique Code): S2021UP837900* and office at *PS Tower, Second Floor, Mamura, Sector-66, Noida, Uttar Pradesh-201301 IN* and have examined:

all the documents and records made available to us and explanation provided by "*SHARIKA ENTERPRISES LIMITED*" ("the listed entity") having its Registered Office S-550-551 School Block Part-2 Welcome Plaza, Shakarpur, Delhi East, Delhi-110092 IN and books of accounts are maintained at B-124, Sector-67, Noida, Gautam Budh Nagar, UP-201301 IN,

- (a) the filings/ submissions made by the listed entity to the stock exchanges,
- (b) website of the listed entity,
- (c) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

**For the year ended on 31<sup>st</sup> 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 thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; ***(To the extent applicable on the company for the period under review)***
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; ; ***(Not applicable on the company for the period under review)***
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; ; ***(To the extent applicable on the company for the period under review)***



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Office No. 05, Block-C-7, LSC Market, Near Post Office, Sultanpuri, Delhi-110086 IN

Noida Office: PS Tower, Second Floor, Mamura, Sector-66, Noida, UP-201301 IN



- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable on the company for the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable on the company for the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable on the company for the period under review)**
- (g) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- (h) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable on the company for the period under review)**
- (i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not applicable on the company for the period under review)**
- (j) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **(To the extent applicable on the company for the period under review)**

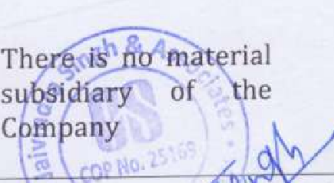
and circulars/ guidelines issued thereunder; and based on the above examination, we hereby report that, during the review period:

a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder

Further to the matter and as advised in the BSE Notice No. 20230316-14 dated 16th March 2023 as well as BSE Notice No. 20230410-41 dated 10th April 2023, following are the additional information which is the part of ongoing Annual Secretarial Audit Report -

S.NO.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1	<b>Secretarial Standards:</b> The Compliances of Listed Entity are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	Yes	NA
2	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are</li></ul>	Yes	NA



	<p>adopted with the approval of Board of Directors of the Listed Entity</p> <ul style="list-style-type: none"> <li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars /guidelines issued by SEBI</li> </ul>	Yes	NA
3	<p><b>Maintenance and disclosures on Website:</b></p> <ul style="list-style-type: none"> <li>The Listed Entity is maintaining a functional website</li> <li>Timely dissemination of the documents/information under a separate section on the website</li> <li>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.</li> </ul>	Yes  Yes  Yes	NA  NA  NA
4	<p><b>Disqualification of Director:</b></p> <p>None of the Director of the Company are disqualified under section 164 of the Companies Act, 2013</p>	Yes	NA
5	<p><b>To examine details related to subsidiaries of Listed Entity:</b></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to</p>	NA	<p>There is no material subsidiary of the Company</p> 



	disclosure of material as well as other subsidiaries	Yes	
6	<b>Preservation of Documents:</b> 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	NA
7	<b>Performance Evaluation:</b> 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 the SEBI Regulations.	Yes	NA
8	<b>Related Party Transactions:</b> (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/rejecter by the Audit Committee.	Yes          NA	NA          NA
9	<b>Disclosure of events or information:</b> 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	*Delay in filing outcome of Board Meeting dated 30.05.2022 *Delay in filing of resignation of Company Secretary Mr. Kush Mishra *No resignation filed for Mrs. Pinki Kumari



10	<p><b>Prohibition of Insider Trading</b></p> <p>The Listed Entity is in compliance with Regulation 3(5) and 3(6) SEBI (Prohibition and Insider Trading) Regulations, 2015.</p>	Yes	Company has set Up the SDD software in the month of March, 2023 and filed SDD compliance Certificate only for the Quarter ended 30.06.2022
11	<p><b>Actions taken by SEBI or Stock Exchange(s), if any:</b></p> <p>No Actions 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)</p>	Yes	Fine impose on the listed entity by the Stock Exchange details given in the below mentioned table.
11	<p><b>Additional Non-Compliances, if any:</b></p> <p>No any additional non-compliance observed for all SEBI regulatory/circular/guidance note etc.</p>	Yes	<p>*Non filing of statement of Related Party Transaction in XBRL mode for quarter ended March, 2022</p> <p>*Delay in filing Shareholding Pattern for the Quarter ended 30.06.2022</p> <p>*Non filing of intimation of Trading window closure for the Quarter ended September, 2022, December, 2022,</p> <p>*Delay in Filing Compliance Certificate on Demat/Remat, Corporate Governance Report, Investor Compliant, Shareholding Pattern for the quarter ended September, 2022</p> <p>*Non filing of statement of Related Party Transaction in XBRL mode for quarter ended September, 2022</p>





**Compliances related to resignation of Statutory Auditors from Listed Entity and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October, 2019:**

S. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<b>Compliances with the following conditions while appointing/re-appointing an auditor</b>		
	<p><b>i.</b> 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><b>ii.</b> 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><b>iii.</b> 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>	NA	No Event has been occurred for resignation of the Auditor and hence, the existing Auditor has duly signed the Limited Review Report(LLR)/Audit Report for all four quarters as well as reporting F.Y.
2.	<b>Other Conditions relating to resignation of Statutory Auditor</b>		





	<p>i. Reporting of concerns by Auditor with respect to the listed entity/ its material subsidiary to the Audit Committee:</p> <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:</p> <p>The Auditor has provided an appropriate disclaimer in its audit report, which is in 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.</p>	<p>NA</p> <p>NA</p> <p>NA</p> <p>NA</p> <p>NA</p>	<p>NA</p> <p>No Event has been occurred for resignation of the Auditor</p> <p>As there was no event for resignation of Auditor, no information was required to be received and communicated.</p> <p>NA</p>
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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/CFR/CMD1/114/2019 dated 18 <sup>th</sup> October, 2019.	NA	NA
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(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/ circulars/ guidelines including specific clause)	Regulation /Circular No.	Deviations	Action Taken by	Type of Action (Advisory/Clarification/ Fine/Show Cause Notice/ Warning, etc.	Details of Violation	Fine Amount (in Rs.)	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	The listed entity shall submit to the stock exchanges disclosures of related party transactions in the format as specified by the Board from time to time, within fifteen days from the date of publication of its standalone and consolidated financial results	Reg 23(9) of SEBI (LODR) Regulations, 2015	Non Submission	BSE LTD	Fine Imposed	Non Submission	259600	Company subsequently filed the same in PDF only and has submitted an application for waiver of fine.	We have submitted an application for waiver of fine.	---
2	The composition of board of directors of the listed entity	Reg 17(1) of SEBI (LODR) Regulations, 2015	Non Compliance	BSE LTD	Fine Imposed	Non Compliance	542800/-	As on 31.03.2023 company maintain the composition and an application for waiver of fine has been filed by the Company.	We have submitted an application for waiver of fine.	

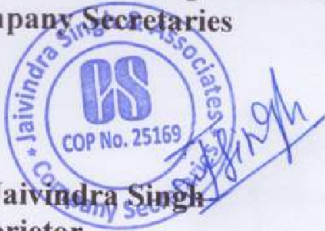
(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks



	specific clause)									
1.	NIL									

**For Jaivindra Singh and Associates  
Company Secretaries**



**CS Jaivindra Singh  
Proprietor**

**M. NO.: 67462**

**COP NO.: 25169**

**Peer review No: 2806/2022**

**UDIN: A067462E000369137**

Date: 24.05.2023

Place: Noida