

# SVARAJ TRADING & AGENCIES LIMITED

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Registered office: Office No. 30, 380/82 Amruteshwar Co-operative Housing Soc. Ltd. 2nd floor, Jagannath Sunkersett Road, Mumbai, Maharashtra-400002. Ph.: 022-22053575  
[CIN: L51100MH1980PLC022315]

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**May 25, 2023**

The Manager (Listing)  
BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort  
Mumbai 400 023  
Fax No. 2272 5092/3030

Scrip code: **503624**

**Subject: Annual Secretarial Compliance Report for the financial year ended on March 31, 2023**  
**Ref.: SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019**

Dear Sir,

Pursuant to aforesaid SEBI circular and in compliance with regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, please find attached herewith Annual Secretarial Compliance Report issued by the practicing Company Secretary for the financial year ended on March 31, 2023.

Please take the same on your record.

Thanking you,

Yours faithfully,

**For Svaraj Trading and Agencies Limited**

HAREN  
DRA  
GUPTA

Digitally signed by  
HARENDRA GUPTA  
DN: cn=HARENDRA  
GUPTA, o=IN  
co=Personal  
Reason: I am the author  
of this document  
Location:  
Date: 2023.05.25  
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**Harendra Gupta**  
**Managing Director**  
**DIN: 05335662**  
**Email Id: svarajtradingagencies@gmail.com**

# R M MIMANI & ASSOCIATES LLP

## COMPANY SECRETARIES

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### The Board of Directors

#### Svaraj Trading and Agencies Limited

[CIN: L51100MH1980PLC022315]

office No. 30, 2nd floor 380/82 Amruteshwar,

CHSL Jagannath Sunkersett Road,

Mumbai 400002

We have been engaged by **Svaraj Trading and Agencies Limited** (hereinafter referred to as 'the Company') whose equity shares are listed on BSE Limited (Security Code: 503624) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance of the provisions of Securities and Exchange Board of India Act, 1992 ("SEBI Act"), the Securities Contracts (Regulation) Act, 1956 ("SCRA"), and all applicable Rules, Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all SEBI Act, SCRA and all applicable Rules, Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon. This is neither an audit nor an expression of opinion.

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 as considered necessary and adequate for the said purpose.

We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.

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.

Annual Secretarial Compliance Report in the format prescribed is enclosed herewith.

For **R M Mimani & Associates LLP**

[**Company Secretaries**]

[**Firm Registration No.: L2015MH008300**]

MANOJ  
KUMAR  
MIMANI

**Manoj Mimani**  
(Partner)

ACS: 17083

CP No: 11601

PR No.:1065/2022

UDIN: A017083E000375419

Place:Mumbai

Dated: May 25, 2023

# R M MIMANI & ASSOCIATES LLP

## COMPANY SECRETARIES

### Secretarial Compliance Report of

Svaraj Trading and Agencies Limited for the year ended March 31, 2023

[Under regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Svaraj Trading and Agencies 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 on March 31, 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 there-under; and
  - b. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there-under and the Regulations, circulars, guidelines issued there-under 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; **[Not applicable as there was no reportable event during the review period]**
- (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 as there was no reportable event during the review period]**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **[Not applicable as there was no reportable event during the review period]**
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **[Not applicable as there was no reportable event during the review period]**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

and circulars/ guidelines issued there-under;

Based on the above examination, we hereby report that;

- (a) During the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status(Yes/ No/NA)	Observations /Remarks by PCS*
1.	<b>Secretarial Standards:</b> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118 (10) of the Companies Act, 2013 and mandatorily applicable.	Yes	Nil

**R M MIMANI & ASSOCIATES LLP**  
**COMPANY SECRETARIES**

2.	<b>Adoption and timely updating of the Policies:</b> <ul style="list-style-type: none"> <li>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li> <li>• All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/circulars/guidelines issued by SEBI</li> </ul>	Yes	Nil
3.	<b>Maintenance and disclosures on Website:</b> <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	Nil
4.	<b>Disqualification of Director:</b> None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	Nil
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t. :</b> <ul style="list-style-type: none"> <li>(a) Identification of material subsidiary companies</li> <li>(b) Disclosure requirement of material as well as other subsidiaries</li> </ul>	N.A.	Nil
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	Nil
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/during the financial year as prescribed in SEBI Regulations.	Yes	Nil
8.	<b>Related Party Transactions:</b> <ul style="list-style-type: none"> <li>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</li> <li>(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.</li> </ul>	N.A. N.A.	Nil Nil
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.	Yes	Nil
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	No	<i>The Company maintained the data base as required under</i>

**R M MIMANI & ASSOCIATES LLP**  
**COMPANY SECRETARIES**

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			<i>regulation 3(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015, in excel format.</i>
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> 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.	N.A.	Nil
12.	<b>Additional Non-compliances, if any:</b> Nil	NA	Nil

- (b) Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019- **[Not applicable, as there was no observation made in previous report.]**
- (c) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports **[Not applicable, as there was no observation made in previous report.]**

For **R M Mimani & Associates LLP**  
**[Company Secretaries]**  
**[Firm Registration No.: L2015MH008300]**

MANOJ  
KUMAR  
MIMANI

**Manoj Mimani**  
**(Partner)**  
ACS: 17083  
CP No: 11601  
PR No.:1065/2022

UDIN: A017083E000375419

Place: Mumbai  
Dated: May 25, 2023