

SHRADHA AI TECHNOLOGIES LIMITED

(Formerly known as Shradha Industries Limited)

CIN: L51227MH1990PLC054825

Registered Office: 1st floor, 345, Shradha House, Kingsway Road, Nagpur — 440001, Maharashtra, India

Email id: shradhaindustriestlimited1@gmail.com,

Website: <https://shradhaitechnologies.com/>, Phone No.: 0712-6617181/82

Through Online Filing

Wednesday, 29th May 2024

SAITL/CS/364

To,
Listing Compliance Department,
Metropolitan Stock Exchange of India
Limited (MSE),
Vibgyor Towers, 4th Floor, Plot No C-62,
Opp. Trident Hotel, Bandra Kurla Complex,
Bandra (E), Mumbai – 400098

To,
BSE Limited
Phiroze Jeejeebhoy
Towers, Dalal Street,
Mumbai – 400001

Symbol : SHRAAITECH

ISIN No. : INE489B01023

Scrip Code: 543976

Subject : Submission of Annual Secretarial Compliance Report for the Financial Year
2023-2024 ended on 31st March, 2024

Dear Sir/Madam,

With reference to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019, please find enclosed Annual Secretarial Compliance Report of the Company for the Financial Year 2023-2024 ended on 31st March, 2024, issued by CS Riddhita Agrawal, Practising Company Secretary, Mumbai, the Secretarial Auditor of the Company.

You are requested to take the above information on your records.

Thanking you.

Yours faithfully,

SHRADHA AI TECHNOLOGIES LIMITED
(Formerly known as Shradha Industries Limited)

Harsha Bandhekar
Company Secretary & Compliance Officer
ICSI Membership No. A54849



**ANNUAL SECRETARIAL COMPLIANCE REPORT
OF
SHRADHA AI TECHNOLOGIES LIMITED
(FORMERLY KNOWN AS SHRADHA INDUSTRIES LIMITED)
FOR THE YEAR ENDED 31ST MARCH, 2024
(Pursuant to SEBI- CIR/CFD/CMD/1/27/2019 Dated February 08, 2019)**

To,
**The Board of Directors
Shradha AI Technologies Limited
(Formerly known as Shradha Industries Limited)**
CIN: L51227MH1990PLC054825
Address: 1st floor, 345, Shradha House,
Kingsway Road, Nagpur - 440001,
Maharashtra, India

I CS Riddhita Agrawal, Practicing Company Secretary (FCS No. 10054, Certificate of Practice No. 12917 and Peer Review Certificate No.12917) have examined:

- all the documents and records made available to us and explanation provided by M/s **SHRADHA AI TECHNOLOGIES LIMITED [Formerly known as Shradha Industries Limited]** ("the listed entity"),
- the filings / submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2024 ("Review Period") in respect of compliance with the provisions of :

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;





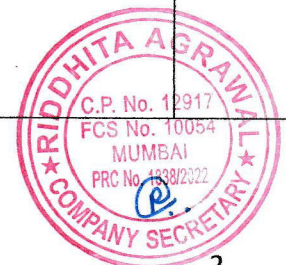
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable during the period under review;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **Not Applicable during the period under review;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 ; **Not Applicable during the period under review;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) 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 to the extent of securities issued;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

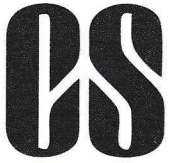
and circulars/ guidelines issued thereunder;

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 thereunder, except in respect of matters specified below:-

S r. N o.	Compli ance Requir ement (Regula tions/ circular s/ guideli nes includi ng specific clause (i)	Reg ulat ion/ Circ ular No. (ii)	Deviat ion (iii)	Act - ion tak -en by (iv)	Ty pe of Act - ion (v)	Details of Violat ion (vi)	Fine Amo- unt (vii)	Observat ion/ Remark of the Practicing Company Secretary (viii)	Manage ment Response (ix)	Rema rks (x)
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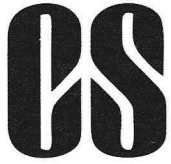




1	Stakeholders Relationship Committee	Regulation 20 (2)/(2A)	Absence of a Chair person for the Stakeholders Relationship Committee as per Regulation 20(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Quarter ended 31st December, 2023.	BSE and MSEI	Fine/Penalty	Non-Compliance with the requirements pertaining to composition of Stakeholders Relationship Committee (absence of a Chairperson for the Stakeholders Relationship Committee for the Quarter ended 31st December, 2023.)	i) BSE-Rs. 1,29,800/- including taxes ii) MSEI-Rs. 1,29,800/- including taxes	As per details given in column (vi) of Table (a), the Company has paid the fine/penalty imposed on 26 th February 2024 to BSE & MSEI respectively.	The Company has paid the fine and requested to the Stock Exchanges (BSE and MSEI) vide letter dated 06 th march 2024 for Waiver of Fine.	Waiver case is under process with Listing Operating team
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(b) The listed entity has taken the following actions to comply with the observations made in previous reports:





Sr. No.	Observation/ Remark of the Practicing Company Secretary in the previous reports) (PCS)	Observations Made in the secretarial compliance Report for the year ended 31.03. 2022 (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Pursuant to SEBI LODR Regulations, 2015, the listed entity shall give at least 7 working days advance notice to Stock Exchange for the record date and specifying purpose the of record date	Nil- No non Compliance was observed for a period prior to period ended on 31.03.2023	Pursuant to SEBI LODR Regulations, 2015, the listed entity shall give at least 7 working days advance notice to Stock Exchange for the record date and specifying purpose the of record date	Non Compliance of Regulation 42- of SEBI LODR Regulations, 2015 a Fine amounting to Rs. Rs. 10,000/- (Excluding Taxes) was levied by the MSEI.	The Company has complied with the said regulation by payment of the requisite fine/ penalty on 15/02/2023.	The Company has complied with the said regulation and paid the fine/ penalties levied by the Exchange and no further action is required to be taken by the Company.

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

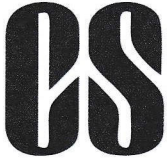
Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/ Remarks by PCS
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)	Yes	None





2.	Adoption and timely updation of the Policies: <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 been reviewed & timely updated as per the regulations/ circulars/ guidelines issued by SEBI	Yes Yes	None
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">• The Listed entity is maintaining a functional website i.e. https://shradhaatechnologies.com/• 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 re-directs to the relevant document(s)/ section of the website	Yes Yes Yes	None
4.	Disqualification of Director: <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	None
5.	To examine details related to Subsidiaries of listed entities: <p>a. Identification of material subsidiary companies</p>	NA	The Company had identified that there were no material subsidiary Company of the listed entity during the review period.





	b. Requirements with respect to disclosure of material as well as other subsidiaries	NA	The Company does not have any listed or unlisted/ material or non-material subsidiary.
6.	Preservation of Documents: 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	None
7.	Performance Evaluation: 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	None
8.	Related Party Transactions: 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 Not Applicable	None No such situation arose
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR	Yes	None





	Regulations, 2015 within the time limits prescribed thereunder.		
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	Actions taken by SEBI or Stock Exchange(s) if any: Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	Yes	The Stock Exchanges (BSE & MSEI) has taken action for the non-compliance of Regulation 20 (2) of the SEBI (LODR) 2015 and the same has been detailed in Table (a) of this Report.
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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.	Not Applicable	No such situation arose
13.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.	Yes	None





The Additional disclosures of Annual Secretarial Compliance Report as below:-

Assumptions and Limitations 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. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I 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.

Signature:



Name: CS RIDDHITA AGRAWAL

Practicing Company Secretary

FCS No.: 10054

CP No.: 12917

Peer Review Certificate No.: 1838/2022

UDIN: F010054F000404943

Date: 26/05/2024

Place: Mumbai