

SHREE GLOBAL TRADEFIN LIMITED

Regd. Office: A2, 2nd Floor, Madhu Estate, Pandurang Budhkar Marg, Lower Parel, Mumbai 400013
Tel. 022- 6291 8111 email: sgtl2008@gmail.com **CIN:** L27100MH1986PLC041252 **Website:** www.sgtl.in

Date: 29th May, 2023

To,

BSE Limited

The Corporate Relationship Department

P.J. Towers, 1st Floor,

Dalal Street, Mumbai – 400 001

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

Ref: BSE Scrip Code: 512463

BSE Scrip ID: SHRGLTR

Dear Sir/Madam,

With reference to the above subject and in terms of the SEBI circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019; we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2023.

Kindly take the same on record,

Thanking you,

Yours faithfully,

For Shree Global Tradefin Limited

Kumari Rachna

Company Secretary



SECRETARIAL COMPLIANCE REPORT

of

SHREE GLOBAL TRADEFIN LIMITED

for the financial year ended 31st March 2023

To,

The Board of Directors,

Shree Global Tradefin Limited (CIN : L27100MH1986PLC041252)

A2, 2nd Floor, Madhu Estate,

Pandurang Budhkar Marg, Lower Parel,

Mumbai 400013 IN

I, Hemant Maheshwari, Company Secretary in Practice have examined:

- all the documents and records made available to us and explanation provided by **Shree Global Tradefin Limited** ("the listed entity") and its officers;
- the filings/submissions made by the listed entity to the stock exchanges viz., BSE Ltd. (Scrip Code: 512463);
- website of the listed entity viz. <http://www.sgtl.in/>; and
- other documents and reports filed with the aforesaid Stock Exchanges from time to time.

for the year ended 31st March 2023 ("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 hereinafter referred as "SEBI (LODR) Regulations 2015";
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations,





- 2018 (Not Applicable during the review period);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
 - (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 (Not Applicable during the review period);
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (i) Securities and Exchange Board of India (Depositories and Participants Regulations) 2018;
 - (j) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client;
 - (k) The Depositories Act, 1996 and the Regulations and Byelaws framed thereunder;

and based on my examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations, circulars/ guidelines issued thereunder, except in respect of matters specified below:

| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observations/ Remarks |
|--------|--|-------------------------------|-----------------------|
| 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), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable. | Yes | - |





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| 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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI | Yes | - |
| 3 | Maintenance and disclosures on Website: <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 re- directs to the relevant document(s)/ section of the website | Yes | - |
| 4 | Disqualification of Director: <p>None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p> | Yes | - |





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| 5 | Details related to Subsidiaries of listed entities have been examined w.r.t. : (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries | Yes | The subsidiary of the Company is Lloyds Steels Industries Limited which is listed on BSE & NSE |
| 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 | - |
| 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/during the financial year as prescribed in SEBI Regulations. | Yes | - |





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| 8 | Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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. | Yes | - |
| 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 Regulations, 2015 within the time limits prescribed thereunder. | Yes | - |
| 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 | - |





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| 11 | Actions taken by SEBI or Stock Exchange(s), if any: 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 except as provided under separate paragraph herein (**). | Yes | - |
| 12 | Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. | Yes | - |

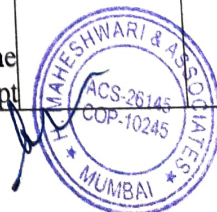
Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

| Sr. No | Particulars | Compliance Status (Yes/No/NA) | Observations/Remarks |
|--------|---|-------------------------------|----------------------|
| 1 | Compliances with the following conditions while appointing/re-appointing an auditor | | |





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| | <p>i. 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>ii. 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>iii. 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> | <p>Not Applicable for the FY 2022-23</p> | <p>-</p> |
| <p>2</p> | <p>Other conditions relating to resignation of statutory auditor</p> | | |
| | <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</p> | <p>Not Applicable for the FY 2022-23</p> | <p>-</p> |





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| | <p>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> | | |
| 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/CFD/CMD1/114/2019 dated 18th October, 2019. | Not Applicable for the FY 2022-23 | - |

(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 | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|---|-------------------------|------------|-----------------|--|----------------------|-------------|--|---------------------|---------|
| | NA | - | - | - | Advisory/ Clarification/ Fine/Show Cause Notice/ Warning, etc. | - | - | - | - | - |

(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 specific clause) | 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 |
|---------|--|--|------------|---|----------------|---|---|---|---------------------|---------|
| 1 | Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer | Regulation 6(1) SEBI (LODR) Regulations 2015 | | BSE Limited vide its emails received on 22.11.2021, 08.12.2021 & 04.04.2022 | Fine | Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer. | Imposed fine of Rs. 50740/ was for the Quarter ended September 2021 | The Company has submitted all the documents related to the same and requested to BSE for fine waiver vide letters dated 23.11.2021, 09.12.2021 and 28.02.2022, and email dated 17.02.2022, 04.04.2022. The BSE Limited has waived the fine through mail dated 20th May, 2022. | - | - |

FOR H. MAHESHWARI & ASSOCIATES
(COMPANY SECRETARIES)



CS HEMAANTT MAHESHWARI

PROPRIETOR

M. No. 26145

COP No. 10245

SIGNED GENERATING UDIN **A026145E000384107** DATED 26 MAY 2023 AT MUMBAI.