



S.R. Industries Limited

CIN: L29246PB1989PLC009531
Regd. Off.: E-217, Industrial Area, Phase 8B
Mohali, Punjab - 160071
Website: www.srfootwears.com
Email: info@srfootwears.com
Tel: +91 172 4602888

01.07.2020

Dept. of Corporate Services
The Bombay Stock Exchange Ltd,
Floor 25, Pheroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI – 400 001

Ref: Scrip code: 513515 Scrip ID: SRIND

Sub: Annual Secretarial Compliance Report for the financial year ended on 31st March, 2020

Dear Sir,

In terms of the SEBI circular No: CIR/CFD/CMD1/27/2019 dated February 8th, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued to the Company by Mr. RPS Khurana, Company Secretary in Practice for the financial year ended March 31st, 2020.

This is for your information and necessary records please.

Thanking you.

Yours faithfully,
For S.R. Industries Limited

(Amit Mahajan)
Chief Financial Officer

SECRETARIAL COMPLIANCE REPORT

of

S R INDUSTRIES LIMITED

(CIN: L29246PB1989PLC009531)

(for the year ended 31st March 2020)

I have examined:

- (a) all the documents and records made available to us and explanation provided by S R INDUSTRIES 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 31st 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; **Complied**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Complied**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Complied**
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; - **Not applicable**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not applicable**



- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Complied**
- (i) Securitization and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002.

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: -

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	State Bank of India vs S R Industries Limited in Debt Recovery Tribunal	NA	Last date of hearing was 19 th June, 2020 and matter is adjourned.
2	UCO Bank vs S R Industries Limited in Debt Recovery Tribunal	NA	Due for hearing on 23 rd October, 2020

- (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 my/our examination of those records.


- (c) There are no 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
NA				

- (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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	SERFASI Notice under sec 13-2 Form State Bank of India for Default in repayment to SBI and UCO Bank to the tune of Rs. 34,13,36,192.89	For the year ended 31 st March 2019	The Company has entered in to One-time settlement with State Bank of India against the credit facilities availed by the company.	State Bank of India vs S R Industries Limited in Debt Recovery Tribunal is pending for hearing.
2	SERFASI Notice under sec 13-2 Form State Bank of India for Default in repayment to SBI and UCO Bank to the tune of Rs. 34,13,36,192.89			UCO Bank vs S R Ind is due for hearing.


 (R.P.S. Khurana)
 For R.P.S. Khurana & Associates
 UDIN : A012383B000405321
 Membership No.: 12333
 CP. No.: 5013

Place: Chandigarh
 Date: 01/07/20