

SARTHAK INDUSTRIES LIMITED

CIN: L99999MH1982PLC136834

Regd. Office: ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (Maharashtra)
400009, Phone: 022 23480110, Email: sarthakindustries@yahoo.in, website: www.sarthakindustries.com

May 16, 2023

To,

BSE Limited,
25th Floor, Phiroze
Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400001

BSE Scrip Code: 531930

Dear Sir/Madam,

Subject: Intimation regarding Submission of Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR), Regulations, 2015.

With reference to the captioned subject, we are enclosing herewith Annual Secretarial Compliance Report for the year ended 31st March, 2023 issued by **M/s. Ajit Jain & Co., Practicing Company Secretary (COP NO.:2876, FCS NO.:3933)** in compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019.

You are requested to take the same on your records and confirm compliance.

Thanking You,
Yours sincerely,

For Sarthak Industries Limited

Riya

Bhandari

Digitally signed
by Riya Bhandari
Date: 2023.05.16
16:15:47 +05'30'

Riya Bhandari

Company Secretary & Compliance Officer

SECRETARIAL COMPLIANCE REPORT OF SARTHAK INDUSTRIES LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2023

(Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 and BSE Circular 20230410-41 and NSE Circular NSE/CML/ 2023/30 dated April 10, 2023)

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **SARTHAK INDUSTRIES LIMITED** (hereinafter referred as 'the listed entity'), having its Registered Office at **ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (MAHARASHTRA) 400009**, Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that in our opinion, the listed entity has, during the review period covering the financial year ended on March 31, 2023, complied with the statutory provisions listed hereunder and also that the listed entity has proper Board processes and compliance mechanism in place to the extent, in the manner and subject to the reporting made hereinafter:

I Ajit Jain, proprietor of **AJIT JAIN & CO., PRACTICING COMPANY SECRETARY** have examined:

(a) all the documents and records made available to us and explanation provided by **SARTHAK INDUSTRIES LIMITED** (CIN: L99999MH1982PLC136834) ("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, 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;

(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 review period)

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(Not applicable during review period)

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

(Not applicable during review period)

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable during review period)*

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;

(Not applicable during review period)

And circulars/guidelines issued thereunder;

We hereby report that, during the Review Period the Compliance status of the listed entity is appended below:



Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS
1.	<p><u>SECRETARIAL STANDARD</u></p> <p>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.</p>	YES	None
2.	<p><u>ADOPTION AND TIMELY UPDATION OF THE POLICIES:</u></p> <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 theregulations/circulars/guidelines issued by SEBI 	YES YES	None None
3.	<p><u>MAINTENANCE AND DISCLOSURES ON WEBSITE:</u></p> <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 YES YES	None None None
4.	<p><u>DISQUALIFICATION OF DIRECTOR:</u></p> <p>None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the Listed entity.</p>	YES	None



5.	<p><u>DETAILS RELATED TO SUBSIDIARIES OF LISTED ENTITIES W.R.T.</u></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirements of material as well as other subsidiaries</p>	<p>NA</p> <p>NA</p>	<p>The Listed Entity does not have any material or other subsidiary.</p>
6.	<p><u>PRESERVATION OF DOCUMENTS:</u></p> <p>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</p>	<p>YES</p>	<p>None</p>
7.	<p><u>PERFORMANCE EVALUATION:</u></p> <p>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</p>	<p>YES</p>	<p>None</p>
8.	<p><u>RELATED PARTY TRANSACTIONS:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions; or</p> <p>(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.</p>	<p>YES</p> <p>NA</p>	<p>Prior Approval was taken for all Related Party Transactions.</p>



9.	<u>DISCLOSURE OF EVENTS OR INFORMATION:</u> 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	None
10.	<u>PROHIBITION OF INSIDER TRADING:</u> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	YES	None
11.	<u>ACTIONS TAKEN BY SEBI OR STOCK EXCHANGE(S), IF ANY:</u> 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 excepted as provided under separate paragraph herein (*)	YES	As informed by the Management, no Actions were taken against the Company/ its promoters/ directors/ subsidiaries either by SEBI or by BSE under SEBI Regulations and circulars/ guidelines issued there under during the year under review
12.	<u>ADDITIONAL NON-COMPLIANCES, IF ANY:</u> No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	YES	No additional non compliance were observed for any SEBI regulation/ circular/guidance note etc. during the year under review.



COMPLIANCES RELATED TO RESIGNATION OF STATUORY AUDITORS FROM LISTED ENTITIES AND THEIR MATERIAL SUBSIDIARIES AS PER SEBI CIRCULAR CIR/CFD/CMD1/114/2019 DATED OCTOBER 18, 2019:

No event relating to resignation of auditor has occurred during the review period; hence, this clause is not applicable.

The Additional Disclosures of Annual Secretarial Compliance Report are as below:-

- (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	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
--- Not Applicable ---										

- (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 (Advisory /Clarification/ Fine/Show Cause Notice/ Warning, etc.)	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
--- Not Applicable ---										



ASSUMPTIONS & LIMITATION 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. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. 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.



For Ajit Jain & Co.
Company Secretaries

A. K. Jain

Ajit Jain
(Proprietor)

COP NO.:2876, FCS NO.:3933

UDIN: F003933E000303111

Peer Review Certificate No.:767/2020

PCS Unique ID NO.: S1998MP023400

Place: Indore

Dated: 13.05.2023