



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

Date: 30.05.2019

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, 2019

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, 2019

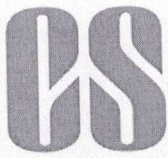
This is for your information and necessary records please.

Thanking you.

Yours faithfully,
For S.R. Industries Limited



(Samandeep Kaur),
Company Secretary



Annual Secretarial Compliance Report

S R INDUSTRIES LTD
E- 217, Industrial Area,
Phase 8B Mohali, Punjab, 160071
CIN: L29246PB1989PLC009531

I have examined:

- (a) all the documents and records made available to us and explanation provided by **S R INDUSTRIES LTD** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website (Inspection) of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

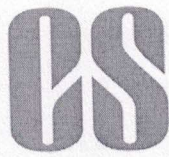
for the year ended March 31, 2019 ("Review Period") in respect of compliance with the provisions of:

- (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;





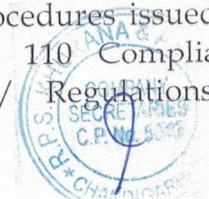
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002.

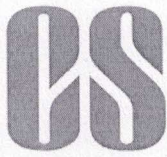
Based on the above examination, I hereby report that, during the Review Period:

- (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.	Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002.	Default in repayment to SBI and UCO Bank to the tune of Rs. 34,13,36,192.89	SERFASI Notice Under Sec 13-2 From State Bank of India

- (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 examination of those records.
- (c) The following are the details of 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 Guidance Note on Annual Secretarial 110 Compliance Report various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:
- (d)





R P SKHURANA
COMPANY SECRETARY
C.P. 5013

H No. 2407, Sector 35-C,
Chandigarh-160022
Ph:0172-4612292, MB-9815587783
Email: rpskhurana7@gmail.com

Sr. No.	Action taken by person in Charge	Details of violation	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.
			NOT APPLICABLE	

(e) 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
		NOT APPLICABLE		

Date:21/05/2019
Place: Chandigarh


R P S. Khurana
Company Secretary
ACS No. 12333
CP No. 5013