

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 20, 2024

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, 2024 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
Company Secretary & Compliance Officer

**SECRETARIAL COMPLIANCE REPORT OF SARTHAK INDUSTRIES LIMITED
FOR THE YEAR ENDED 31st MARCH, 2024**

{Pursuant to regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015}

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, 2024** ("*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, including:-

(a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("*SEBI (LODR) 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; (*To the extent of applicability to the Company*)

(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*Not applicable to the listed entity during the Review Period*)



(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable to the listed entity during the Review Period)*

(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *(Not applicable to the listed entity during the Review Period)*

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013; *(Not applicable to the listed entity 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 (Delisting of Equity Shares) Regulations, 2009; *(Not applicable to the listed entity during the 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:

Pursuant to BSE Notice No. 20230316-14 dated March 16, 2023 and BSE Notice No. 20230410-41 dated April 10, 2023;

Sr. No.	Particulars	Compliance status(Yes/No/NA)	Observations /Remarks by PCS
1.	<u>SECRETARIAL STANDARD</u> 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	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 entity. • All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI. 	<p>Yes</p> <p>Yes</p>	<p>None</p>
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. 	<p>Yes</p> <p>Yes</p> <p>Yes</p>	<p>None</p>
4.	<p><u>DISQUALIFICATION OF DIRECTOR:</u></p> <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>	<p>Yes</p>	<p>None</p>
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>Yes</p> <p>Yes</p>	<p>None</p>



6.	<u>PRESERVATION OF DOCUMENTS:</u> 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.	<u>PERFORMANCE EVALUATION:</u> 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	None
8.	<u>RELATED PARTY TRANSACTIONS:</u> (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 N.A.	None The Company has taken prior approval of Audit committee for all Related party transactions.
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.	Yes	None
12.	<u>ADDITIONAL NON-COMPLIANCES, IF ANY:</u> No any additional non-compliance observed for all SEBI regulation/circular/ guidance note etc.	NA	None

Compliances related to Resignation of Statutory Auditors from Listed Entities and their material subsidiaries as per SEBI circular CIR/CFD/CMD1/114/2019 dated October 18, 2019: *Not applicable to the listed entity during the Review Period*

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	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.)	Details of Violation	Fine Amount	Observations/Remarks of the Practising Company Secretary	Management Response	Remarks
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--- 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: F003933F000366108

Peer Review Certificate No.:767/2020

PCS Unique ID NO.: S1998MP023400

Place: Indore

Date: 14.05.2024