



# M/S Nagreeka EXPORTS LIMITED

(STAR TRADING HOUSE RECOGNISED BY GOVT. OF INDIA)

REGD. OFFICE : 18, R. N. MUKHERJEE ROAD, KOLKATA - 700 001, INDIA  
Ph. : 2210-8828, 2248-4922/4943, Fax : 91-33-22481693, E-mail : sushil@nagreeka.com



7167

NEL/SE/2023-24

Date: 09-12-2023

To The Deputy General Manager Corporate Relationship Dept. <b>Bombay Stock Exchange Limited</b> 1 <sup>st</sup> Floor, New Trading Ring Rotunda Building, P.J. Towers Dalal Street Fort Mumbai 400 001 <b>Scrip Code - 521109</b>	To The Deputy General Manager Corporate Relationship Dept. <b>National Stock Exchange of India Limited</b> Exchange Plaza Bandra Kurla Complex Bandra (E) Mumbai 400 051 <b>Scrip Name - NAGREEKEXP</b>
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**ISIN: INE123B01028**

Dear Sir/Madam,

**Subject: Disclosure under Regulation 30 read with Point 20 (b) of Para A of Part A of Schedule III of Securities and Exchange Board of India ("SEBI") (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations") - Fine imposed by BSE Limited and National Stock Exchange of India Limited on the Company**

In terms of Regulation 30 read with Point 20 (b) of Para A of Part A of Schedule III of the Listing Regulations, this is to hereby inform that fines as enumerated hereunder have been imposed on the Company:

- I. Name of the authority: BSE Limited (BSE) and National Stock Exchange of India Limited (NSE).
- II. Nature and details of the action(s) taken, initiated or order(s) passed: Fines of Rs. 75,520/- and Rs. 75,520/- by BSE & NSE respectively imposed on the Company vide emails dated 8<sup>th</sup> December, 2023 for non-compliance of Regulation 17(1A) of the SEBI (LODR) Regulation 2015.
- III. Date of receipt of direction or order, including any ad-interim or interim orders, or any other communication from the authority: ***The entity has not received any mail from both the Exchanges till date which may have not been received due to some technical issue.*** However, Mr. Sushil Patwari, Promoter of the Company has received the mails on 7<sup>th</sup> December 2023 at 09.27 PM and 09.36 PM respectively. Thereafter, he has forwarded the mail to the entity on 8<sup>th</sup> December, 2023 at 06.33 P.M. for which we are also enclosing herewith copies of mails received from him dated 8<sup>th</sup> December, 2023.
- IV. Details of the violation(s)/contravention(s) committed or alleged to be committed: The Exchanges are of the view that the appointment of Mr. Amitava Mazumder, Independent





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7167

## **EXPLANATION FOR DELAY IN SUBMISSION OF DISCLOSURE UNDER REGULATION 30**

The copies of notices for levy of fines under Regulation 17(1A) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 have not been received by the Company from both the Exchanges till date due to some technical error in the mail delivery system. However, Mr. Sushil Patwari, Promoter of the Company have received the mail on 7th December 2023 at 09.27 PM and 09.36 PM which has been forwarded to us on 8th December, 2023 at 06.33 P.M. As the Company has received the notices on 8th December, 2023, so the disclosures as per Regulation 30 of the listing Regulations is being given on 9th December, 2023 to both the Exchanges.

We regret the delay caused in furnishing this disclosure due to technical issue and will make sure that this won't be repeated again.

**compsect.nel@nagreeka.com**

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**From:** Manoj Agarwal <m.agarwal@nagreeka.com>  
**Sent:** Friday, December 8, 2023 6:33 PM  
**To:** compsect.nel@nagreeka.com  
**Subject:** FW: Reminder for freezing of promoters' demat account (SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance)

Thanks & Regards,

Manoj Agarwal  
Chief Financial Officer  
Nagreeka Exports Limited  
Kolkata -700001  
Phone : +91-33-2210-8828, 2248-4922/4943

**From:** Sushil Patwari [mailto:sushil@nagreeka.com]  
**Sent:** 08 December 2023 18:25  
**To:** Manoj Agarwal <m.agarwal@nagreeka.com>; Sunil Patwari <sunil@nagreeka.com>  
**Subject:** Fwd: Reminder for freezing of promoters' demat account (SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance)

----- Forwarded message -----

**From:** Sonali Kurhade <[Sonali.Kurhade@bseindia.com](mailto:Sonali.Kurhade@bseindia.com)>  
**Date:** Thu, Dec 7, 2023 at 9:36 PM  
**Subject:** Reminder for freezing of promoters' demat account (SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance)  
**To:** [sushil@nagreeka.com](mailto:sushil@nagreeka.com) <[sushil@nagreeka.com](mailto:sushil@nagreeka.com)>  
**Cc:** bse.soplodr <[bse.soplodr@bseindia.com](mailto:bse.soplodr@bseindia.com)>

Ref.: SOP-Reminder-September 2023 Quarter

To;  
Company Secretary & compliance officer/ Promoter of the company  
**Company Name: Nagreeka Exports Ltd**  
**Scrip Code: 521109**  
**Promoter name:SUSHIL PATWARI**

Dear Sir/Madam,

**Sub: Reminder for freezing of promoters' demat account (SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance)**

SEBI vide its SEBI circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance) has inter alia prescribed certain penal actions such as levy of financial fines, freezing of promoter demat accounts, transfer to Z group (Trade for Trade) ending with suspension of trading in the securities of the listed entities which do not comply with critical regulations of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

It is observed that as per the latest shareholding pattern report submitted by the **Nagreeka Exports Ltd** , (**Scrip Code: 521109** ), your name has been included in the list of promoters of the company.

The company is non-compliant/not paid fines with the provisions of **following Regulation(s)** for the period mentioned below. As mandated in the SEBI SOP circular the company has been intimated about the pending compliance and has also been informed that **all the promoters' demat accounts would be frozen if the compliance was not completed and fines not paid.**

The details of fines levied, inter alia, pursuant to SEBI SOP Circular no. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (Chapter-VII(A)-Penal Action for Non-Compliance) are as under:

<b>Applicable Regulation of SEBI (LODR) Regulations, 2015</b>	<b>Fine amount outstanding</b>	<b>Fines levied and calculated for the quarter ended</b>	<b>Compliance status/Remarks</b>
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	(incl. GST @ 18 %) (Amount in Rs.)		
<b>Regulation 76 of SEBI (Depositories &amp; Participants) Regulation 2018</b>  Non-submission of Reconciliation of share Capital audit Report.	0	<b>September 2023</b>	
<b>Regulation 6(1)</b>  Non-compliance with requirement to appoint a qualified company secretary as the compliance officer	0	<b>September 2023</b>	-
<b>Regulation 7(1)</b>  Non-compliance with requirement to appoint share transfer agent	0	<b>September 2023</b>	-
<b>Regulation 17(1)</b>  Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	0	<b>September 2023</b>	-
<b>Regulation 17(1A)</b>  Non-compliance with the requirements pertaining to	75520	<b>September 2023</b>	-

appointment or continuation of Non-executive director who has attained the age of seventy-five years			
<b>Regulation 17(2)</b> Non-compliance with the requirements pertaining to the number of Board meetings	0	<b>September 2023</b>	-
<b>Regulation 17(2A)</b> Non-compliance with the requirements pertaining to quorum of Board meetings.	0	<b>September 2023</b>	-
<b>Regulation 18(1)</b> Non-compliance with the constitution of audit committee	0	<b>September 2023</b>	-
<b>Regulation 19(1)/ 19(2)</b> Non-compliance with the constitution of nomination and remuneration committee	0	<b>September 2023</b>	-
<b>Regulation 20(2)/(2A)</b> Non-compliance with the constitution of stakeholder relationship committee	0	<b>September 2023</b>	-
<b>Regulation 21(2)</b> Non-compliance with the constitution of risk management committee	0	<b>September 2023</b>	-
<b>Regulation 27(2)</b>		<b>September 2023</b>	

Non-submission of the Corporate governance compliance report within the period provided under this regulation			
<b>Total</b>	75520		

**Note: In case of Non-Compliance the fines will continued to be levied further till the date of compliance.**

As per Exchange records, it is observed that the company **has not yet complied/ not paid the fines**. Therefore, as in duty bound in terms of the provisions of SEBI SOP circular the Exchange would be proceeding to give instructions to the depositories to **freeze the demat accounts of all the entities mentioned in the shareholding pattern by the company, within 10 days from the date of this communication.**

*It may also be noted that presently the SEBI circular stipulates that the freeze on promoters' demat accounts should **be lifted only after the company complies and pays fines.***

***(Note: For unfreezing of promoters demat accounts, the Company is required to comply with all the pending compliances and pay all the outstanding fines levied under SEBI SOP Circular dated January 22, 2020 (Erstwhile SEBI Circulars dated May 03, 2018; November 30, 2015 and September 30, 2013).***

In case of any queries in the matter, you are advised to kindly take up the matter with the company, **M/s. Nagreeka Exports Ltd**

**Company is requested to transfer the fine amount in the following bank account and confirm the remittance details i.e.UTR No./NEFT Details/Cheque No., etc. on our email id: bse.soplodr@bseindia.com**



<b>Company Name</b>	<b>Nagreeka Exports Ltd</b>		
<b>Bank Name</b>	<b>Branch Name</b>	<b>Account No.</b>	<b>IFSC Code</b>
<b>ICICI Bank Limited</b>	<b>CMS Branch</b>	<b>BSER04556</b>	<b>ICIC0000104</b>

It may be noted that the Policy for exemption of fines detailing the reasons for waiver / reduction of fines levied as per the provisions of SEBI SOP circular is disseminated on the Exchange website at the following link:

[https://www.bseindia.com/downloads1/Policy\\_for\\_Exemption\\_of\\_Fines\\_SOP.pdf](https://www.bseindia.com/downloads1/Policy_for_Exemption_of_Fines_SOP.pdf)

**It may further be noted that:**

- An application for waiver of fines submitted by the company if any, will be considered **only after the applicant company has first complied with the compliances for which it is seeking full / partial waiver of fines**, as required under the Listing Regulation.
- An illustrative list of scenarios which cannot be considered to fall within the ambit of “events” entailing waiver or reduction of fine has been included in the policy disseminated on the Exchange website at aforesaid link.
- The decision of the Exchange shall be final and repeated applications for waivers that are declined earlier, would not be entertained, unless there are any mitigating fresh facts. The Exchange reserves the right to accede to or deny the request for waiver/ reduction in penalty, for reasons to be recorded in writing.

In case of any queries in the matter, you are advised to kindly take up the matter with the

**Contact detail for any queries regarding compliance of specific regulation /clarifications as under:**

<b>Regulation</b>	<b>Contact person</b>	<b>Contact Number</b>	<b>Group Email Id</b>
Reg. 17 to 21, 27	Ms. Bijal Shettigar/ Mr. Rohan Kallan	<a href="mailto:bijal.shettigar@bseindia.com">bijal.shettigar@bseindia.com</a>  <a href="mailto:Rohan.Kallan@bseindia.com">Rohan.Kallan@bseindia.com</a>  022-22728537/5856	<a href="mailto:bse.soplodr@bseindia.com">bse.soplodr@bseindia.com</a>

Reg. 6, 7 & 76	Mr. Yash Gala	022-22728148 <a href="mailto:yash.gala@bseindia.com">yash.gala@bseindia.com</a>	<a href="mailto:bse.soplodr@bseindia.com">bse.soplodr@bseindia.com</a>
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Thanks and Regards,

**Reena Raphel**

Associate Manager – Listing Compliance

**Bijal Shettigar**

Assistant Manager-Listing Compliance

BSE Limited, P J Towers, Dalal Street, Mumbai -400001, India

, [www.bseindia.com](http://www.bseindia.com)

This mail is classified as 'BSE - CONFIDENTIAL' by sonali.kurhade on December 07, 2023 at 21:49:20.

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**compsect.nel@nagreeka.com**

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**From:** Manoj Agarwal <m.agarwal@nagreeka.com>  
**Sent:** Friday, December 8, 2023 6:33 PM  
**To:** compsect.nel@nagreeka.com  
**Subject:** FW: NAGREEKEXP - Reminder before freezing  
**Attachments:** NAGREEKEXP.pdf

Thanks & Regards,

Manoj Agarwal  
Chief Financial Officer  
Nagreeka Exports Limited  
Kolkata -700001  
Phone : +91-33-2210-8828, 2248-4922/4943

**From:** Sushil Patwari [mailto:sushil@nagreeka.com]  
**Sent:** 08 December 2023 18:23  
**To:** Manoj Agarwal <m.agarwal@nagreeka.com>; Sunil Patwari <sunil@nagreeka.com>  
**Subject:** Fwd: NAGREEKEXP - Reminder before freezing

----- Forwarded message -----

**From:** KUNAL ROHRA <[cdfkrohra@vendor.nse.co.in](mailto:cdfkrohra@vendor.nse.co.in)>  
**Date:** Thu, Dec 7, 2023 at 9:27 PM  
**Subject:** NAGREEKEXP - Reminder before freezing  
**To:** [compsect.nel@nagreeka.com](mailto:compsect.nel@nagreeka.com) <[compsect.nel@nagreeka.com](mailto:compsect.nel@nagreeka.com)>, [sushil@nagreeka.com](mailto:sushil@nagreeka.com) <[sushil@nagreeka.com](mailto:sushil@nagreeka.com)>  
**Cc:** Yogesh Deshmukh (LISCO - OPS) <[ydeshmukh@nse.co.in](mailto:ydeshmukh@nse.co.in)>, Rachna Jha (LISCO - OPS) <[rjha@nse.co.in](mailto:rjha@nse.co.in)>, Mandar Desai (LISCO - OPS) <[mndesai@nse.co.in](mailto:mndesai@nse.co.in)>, Sonam Yadav (DEFSEC) <[sonamy@nse.co.in](mailto:sonamy@nse.co.in)>, Harshita Chaubal (LISCO - OPS) <[charshita@nse.co.in](mailto:charshita@nse.co.in)>, Aniket Raut (LISCO - OPS) <[araut@nse.co.in](mailto:araut@nse.co.in)>, DL-LISTINGSOP <[listingSOP@nse.co.in](mailto:listingSOP@nse.co.in)>

Dear Sir/Madam,

As per the captioned subject, please find attached herewith letter issued by the Exchange.

This is for your information and necessary action in this regard.

Regards

Kunal Rohra

Disclaimer note on content of this message including enclosure(s) and attachments(s): The contents of this e-mail are the privileged and confidential material of National Stock Exchange of India Limited (NSE). The information is solely intended for the individual/entity it is addressed to. If you are not the intended recipient of this message, please be aware that you are not authorized in any which way whatsoever to read, forward, print, retain, copy or disseminate this message or any part of it. If you have received this e-mail in error, we would request you to please notify the sender immediately by return e-mail and delete it from your computer. This e-mail message including attachment(s), if any, is believed to be free of any virus and NSE is not responsible for any loss or damage arising in any way from its use.

Non-Confidential

## National Stock Exchange Of India Limited

NSE/SOP/RBF/1264

December 07, 2023

**The Promoter(s)**  
**Nagreeka Exports Limited**  
18, R.N. Mukherjee Road,  
3rd Floor, Kolkata-700001

Dear Sir/Madam,

**Subject: Reminder before freezing of Promoters Holdings for non-compliance with SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015 (“Listing Regulations”) and/or Regulation 76 of SEBI (Depository Participants) Regulations, 2018 (“Depository Regulations”)**

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/2023/120 dated July 11, 2023 (hereinafter referred as ‘Master Circular’), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of the non-compliance with Listing and/or Depository Regulations is continuing and/or repetitive. It is hereby informed that your Company has not made required submission as per Listing and/or Depository Regulations to the Exchange and/or not paid the fine amount levied for observed non-compliance till date.

In view of the identified non-compliance/delayed compliance, the total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

As per aforesaid SOP circular, if the non-compliant listed entity fails to ensure compliance with respective regulations and/or make the payment of fines within 15 days from the date of exchange notice, then the Exchange is duty bound to freeze the entire shareholding of the promoters in the Company as well as in other securities held in the demat account of the promoter till further notice.

Your Company has failed to ensure compliance and/or make the payment of fines. In view of the same, this is the final reminder to ensure compliance with identified regulation and/or payment of fines **within 10 days** from the date of this letter, failing of which the Exchange will initiate freezing of promoter holdings as per above mentioned Master circular.

Yours faithfully  
For **National Stock Exchange of India Limited**

This Document is Digitally Signed

**Rachna Jha**  
Manager



Signer: RACHNA JHA  
Date: Thu, Dec 7, 2023 21:07:35 IST  
Location: NSE

CC:

<b>Sr. No.</b>	<b>Name of Promoter(s)</b>
1.	Sushil Patwari
2.	Sunil Patwari
3.	Mahendra Patwari

This Document is Digitally Signed

Signer: RACHNA JHA  
Date: Thu, Dec 7, 2023 21:07:35 IST  
Location: NSE

**Annexure**

Regulation	Quarter	Fine amount per day (Rs.) / Fine amount per instance (Rs.)	Days of Non-compliance/ No. of instance(s)	Fine amount (Rs.)
17(1A)	30- Sep -2023	2000	32	64000
<b>Total fine</b>				<b>64000</b>
<b>GST@18%</b>				<b>11520</b>
<b>Total Fine payable (Inclusive of 18% GST)</b>				<b>75520*</b>

\* In the case Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date compliance is achieved.

**Notes:**

- If the fine amount paid before receipt of this letter, then inform the Exchange accordingly.
- Please update the payment details on below mentioned path:  
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as above will be credited to IPFT as envisaged in the circular.
- In case of any clarification, you may contact to either of the below named Exchange Officers in Regulatory Operations Department:

- Ms. Sonam Yadav
- Mr. Kunal Rohra

This Document is Digitally Signed


 Signer: RACHNA JHA  
 Date: Thu, Dec 7, 2023 21:07:35 IST  
 Location: NSE