

# Sharda Cropchem Limited

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ISO 9001: 2015 Reg. No: 702949

CIN: L51909MH2004PLC145007



June 25, 2020

To,  
BSE Limited  
The Listing Department  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai - 400 001

**Scrip Code No: 538666**

Dear Sir/Madam,

**Re: Submission of Annual Secretarial Compliance Report for the Financial Year ended March 31, 2020.**

Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby enclose Annual Secretarial Compliance Report issued by KJB & CO LLP., Practising Company Secretaries for the Financial Year ended March 31, 2020 issued on June 24, 2020.

Kindly take the same on record.

Thanking you,

Yours truly,  
For SHARDA CROP CHEM LIMITED

JETKIN GUDHKA  
COMPLIANCE OFFICER



Encl: as above

**Secretarial Compliance Report of**  
**Sharda Cropchem Limited for the year ended 31<sup>st</sup> March 2020**

We, KJB & CO. LLP, Practising Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by Sharda Cropchem 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 31<sup>st</sup> 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;
- (b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **Not applicable to the Company for the period under review;**
- (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - **Not applicable to the Company for the period under review;**
- (e) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **Not applicable to the Company for the period under review;**
- (f) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **Not applicable to the Company for the period under review;**
- (g) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **Not applicable to the Company for the period under review;**
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - **Not applicable to the Company for the period under review;**

and circulars/ guidelines issued thereunder; and based on the above examination,

We 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: -





# KJB & CO LLP

## COMPANY SECRETARIES

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<p>Regulation 20(3) of LODR Regulations:</p> <p>The Chairperson of the Stakeholders Relationship Committee shall be present at the annual general meetings to answer queries of the security holders.</p>	<p>Chairperson of Stakeholder Relationship Committee was not present at the Annual General Meeting of the Company held on August 27, 2019.</p>	<p>The Chairperson of Stakeholders Relationship Committee was not present at the Annual General Meeting of the Company held on August 27, 2019 due to his other commitments and the same was disclosed by the Company in quarterly corporate governance report filed for quarter ended September 30, 2019.</p>
2.	<p>Regulation 23(9) of LODR Regulations-</p> <p>The Company shall submit within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions on a consolidated basis in the format specified in the relevant accounting standards for annual results to the stock exchanges and publish the same on its website.</p>	<p>There was a delay of 117 days in filing of disclosure of related party transactions for the half year ended September 30, 2019, required to be filed in accordance with regulation 23(9) of LODR Regulations.</p>	<p>There was a delay of 117 days in filing of disclosure of related party transactions for the half year ended September 30, 2019, required to be filed in accordance with regulation 23(9) of LODR Regulations.</p>
3.	<p>Regulation 34(1)(a) of LODR Regulations-</p> <p>The listed entity shall submit to the stock exchange and publish on its website a copy of the annual report sent to the shareholders along with the notice of the annual general meeting not later than the day of commencement of dispatch to its shareholders.</p>	<p>There was a delay of 1 day in submission of copy of the Annual Report to the stock exchanges in accordance with regulation 34(1)(a) of LODR Regulations.</p>	<p>There was a delay of 1 day in submission of copy of the Annual Report to the stock exchanges in accordance with regulation 34(1)(a) of LODR Regulations.</p>





# KJB & CO LLP

## COMPANY SECRETARIES

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our 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 various circulars*) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

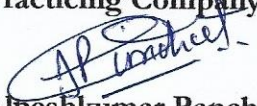
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
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- (d) The listed entity has taken the following actions to comply with 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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Note: We relied on the representation made to us by the management wherever required due to several restrictions imposed by the Central and State government on the travel, movement and transportation considering public health and safety measures, which had impact on the audit assessment due to limited access to information / documents / data as required for audit assessment.

For, KJB & CO LLP,  
Practicing Company Secretary

  
Alpeshkumar Panchal  
Partner

ACS No.: 49008

C P No.: 20120

UDIN: A049008B000374927

Date: 24th June 2020

Place: Mumbai

