



# SHARAT INDUSTRIES LIMITED

CIN - L05005AP1990PLC011276

**Regd. Off.** : Feed Plant, Hatchery & Farm

Venkanna Palem Village, T.P. Gudur Mandal, Nellore - 524 002, Nellore Dist, A.P.

**Processing Plant** : Mahalakshampuram Village, T.P. Gudur Mandal, Nellore - 524 002, Nellore Dist, A.P.

E-mail : [accounts@sharatindustries.com](mailto:accounts@sharatindustries.com), Website : [www.sharatindustries.com](http://www.sharatindustries.com)

30<sup>th</sup> May 2024

BSE Limited,  
Corporate Relationship Department,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 532370.

Dear Sir / Madam,

**Sub: Annual Secretarial Compliance Report for the Year Ended 31<sup>st</sup> March 2024**

**Ref: Scrip Code: 519397**

In line with the requirements of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No: CIR/CFD/CMD1/27/2019 dated 8th February 2019; we are submitting herewith the Annual Secretarial Compliance Report for the Financial Year 2023-2024 issued by Mr. C Prabhakar, (Membership Number F11722 and CP Number: 11033) Practicing Company Secretary.

Kindly take the above information on record.

Thanking You,

**FOR SHARAT INDUSTRIES LIMITED**

**M BALAMURUGAN**  
**COMPANY SECRETARY & COMPLIANCE OFFICER**  
**Membership No: A66115**

**Corporate Off.** : Flat No. 4, 3rd Floor, Pallavi Apartments,  
No. 57/11, Old No. 29/TF4, 1st Main Road,  
HDFC Bank Compound, R.A.Puram, CHENNAI - 600 028.  
Contact No. : 044-24347867 / 24357868,  
E-mail : [chennai@sharatindustries.com](mailto:chennai@sharatindustries.com)

**Nellore Off.** : 16-6-143, Opp. Manasa Apartment,  
Srinivasa Agraharam, Nellore - 524 001.  
Tel. No. : 0861 - 2331727  
E-mail : [hrd@sharatindustries.com](mailto:hrd@sharatindustries.com)



**BP & ASSOCIATES**

Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF SHARAT INDUSTRIES LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH 2024.**

***[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]***

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Sharat Industries Limited (hereinafter referred as 'the listed entity'), having its Registered Office at Venkannapalem Village, T P Gudur Mandal, Nellore, Andhra Pradesh, 524 002. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations 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 the listed entity has, during the review period covering the financial year ended on 31<sup>st</sup> March, 2024 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- a) All the documents and records made available to us and explanations provided by **SHARAT INDUSTRIES LIMITED**
- 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 2024 ("Review Period") in respect of compliance with the provisions of:





- i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, and guidelines issued thereunder;
- ii. the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, and 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, which include:-

- i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iv. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the Company during the audit period)
- v. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the Company during the audit period)
- vi. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;





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vii. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the Company during the audit period)

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

and based on the above examination, we hereby report that, during the Review Period:

I. a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except as given in Annexure -A

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	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
Annexure -B										





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II. we hereby report that, during the review period the compliance status of the listed entity is appended as below :

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<b><u>Secretarial Standards:</u></b> 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.	<b><u>Adoption and timely updation of the Policies:</u></b> <ul style="list-style-type: none"><li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</li><li>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</li></ul>	Yes	None
3.	<b><u>Maintenance and disclosures on Website:</u></b> <ul style="list-style-type: none"><li>The Listed entity is maintaining a functional website</li><li>Timely dissemination of the documents/ information under a separate section on the website</li></ul>	Yes	None

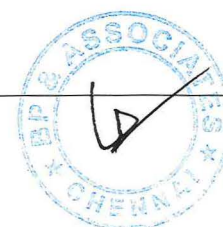




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	<ul style="list-style-type: none"><li>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</li></ul>		
4.	<b><u>Disqualification of Director:</u></b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None
5.	<b><u>Details related to Subsidiaries of listed entities:</u></b> (a) Identification of material subsidiary companies  (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	NA
6.	<b><u>Preservation of Documents:</u></b> 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.	<b><u>Performance Evaluation:</u></b> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None





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8.	<p><b><u>Related Party Transactions:</u></b></p> <p>a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.</p> <p>(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee</p>	Yes	None
9.	<p><b><u>Disclosure of events or information:</u></b></p> <p>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.</p>	Yes	None.
10.	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	None
11.	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>No Actions 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</p>	No	<p>SEBI vide its settlement order SO/AS/EFD2/2022-23/7020 (received by the Company dated 27<sup>th</sup> December 2023) have informed the Company to pay a settlement amount of Rs. 36,25,000/- (Rupees Thirty Six Lakhs and Twenty Five Thousand only) for violations of:</p> <p>i. Regulation 170(1) of SEBI (ICDR) Regulations, 2018,</p> <p>ii. Regulation 163(1) of SEBI</p>





			(ICDR) Regulations, 2018, iii. Regulation 167(6) of SEBI (ICDR) Regulations, 2018, iv. Regulation 31(1) of SEBI (LODR) Regulations, 2015, v. Regulation 6 of SEBI (LODR) Regulations, 2015.  The Company has paid the amount on 03 <sup>rd</sup> January 2024.
12.	<b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u></b>  In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	NA
13.	<b><u>Additional Non-compliances, if any:</u></b>  No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc	Yes	None







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### 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 report 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 BP & ASSOCIATES  
COMPANY SECRETARIES  
PEER REVIEW NO: P2015TN040200

Date: 28<sup>th</sup> May, 2024  
Place: Chennai



C.PRABHAKAR  
PARTNER  
M NO: F11722 | CP NO: 11033  
UDIN: F011722F000476736

## Annexure -A

Sr. No	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 31(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires company to maintain 100% of shareholding of the promoters in dematerialized form	Regulation 31(2)	Due to inadvertent classification of "Public" shareholders in "promoters" category the Company was not able to maintain 100% shareholding of the promoters in dematerialized form	PCS	Other	Due to inadvertent classification of "Public" shareholders in "promoters" category the Company was not able to maintain 100% shareholding of the promoters in dematerialized form.	-	In view of the Company classifying some "Public Shareholders in the promoter's category and classifying the same as "Promoters" inadvertently, the same has resulted in the Company not able to maintain the 100% of shareholding of "promoters" in dematerialized form.	The Company is continuously initiating appropriate steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 for rectifying the errors as soon as possible due to incorrect classification of certain public shareholders under promoter's category.	-



Sr. No	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
2.	Regulation 31 A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires to follow the procedure for reclassification of promoters	Regulation 31A	The Company was not in position to comply with the procedure for reclassification of promoters as majority of Shareholders classified as "promoters" were not traceable	PCS	Other	The Company was not able to comply with the procedure for reclassification of promoters	-	<p>At the time of Initial Public offer, some of the Shareholders belonging to the "Public" category were inadvertently classified under "promoters" category.</p> <p>At the time of filing shareholding pattern for the quarter ended 30<sup>th</sup> September 2020, the Company encountered difficulties in loading shareholding data in XBRL form since PAN details of all the promoters were required. Hence, the Company filed the shareholding pattern with the then available PAN numbers of the actual four promoters.</p>	<p>The Company is continuously initiating appropriate steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 for rectifying the errors as soon as possible due to incorrect classification of certain public shareholders under promoters category.</p>	-



Sr. No	Compliance Requirement (Regulations/ circulars/ guide-lines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
3	Regulation 40 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the transfer and transmission of securities between the promoters of the Company.	Regulation 40	Due to inadvertent classification of promoters the Company is not in position to transfer securities of the promoters	PCS	Other	Inadvertent Classification of promoters	-	At the time of Initial Public offer, some of the Shareholders belonging to the "Public" category were inadvertently classified under "promoters" category.	The Company is taking necessary steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 in the near future for rectifying the errors caused due to classification of certain public shareholders as promoters.	

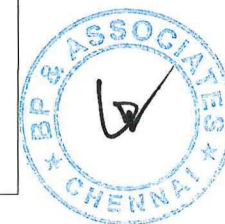


## Annexure-B

Sr. No	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended ..... (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Regulation 31(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires company to maintain 100% of shareholding of the promoters in dematerialized form	2022-23	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Due to inadvertent classification of "Public" shareholders in "promoters" category the Company	The Company is continuously initiating appropriate steps to file a fresh application under	Due to inadvertent classification of "Public" shareholders in "promoters" category the Company was not able to maintain 100% shareholding of the promoters in dematerialized form.	In view of the Company classifying some "Public Shareholders in the promoter's category and classifying the same as "Promoters" inadvertently, the same has resulted in the Company not able to maintain the	The Company is continuously initiating appropriate steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation	-



				any was not able to maintain 100% shareholding of the promoters in dematerialized form	Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015		100% of shareholding of "promoters" in dematerialized form.	of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 for rectifying the errors as soon as possible due to incorrect classification of certain public shareholders under promoter's category.	
2.	Regulation 31 A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires to	2022-23	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company was not in position to	The Company is continuously initiating	The Company was not able to comply with the procedure for reclassification	At the time of Initial Public Offer, some of the Shareholders belonging to	The Company is continuously initiating appropriate steps to file a fresh	-



<p>follow the procedure for reclassification of promoters</p>			<p>comply with the procedure for reclassification of promoters as majority of Shareholders classified as "promoters" were not traceable</p>	<p>appropriate steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015</p>	<p>of promoters</p>	<p>the "Public" category were inadvertently classified under "promoters" category.</p> <p>At the time of filing shareholding pattern for the quarter ended 30<sup>th</sup> September 2020, the Company encountered difficulties in loading shareholding data in XBRL form since PAN details of all the promoters were required. Hence, the Company filed the shareholding pattern with the then available PAN numbers of the actual four promoters.</p>	<p>application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 for rectifying the errors as soon as possible due to incorrect classification of certain public shareholders under promoters category.</p>	
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3.	Regulation 40 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires the transfer and transmission of securities between the promoters of the Company.	2022-23	SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Due to inadvertent classification of promoters the Company is not in position to transfer securities of the promoters	The Company is taking necessary steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015	Inadvertent Classification of promoters	At the time of Initial Public offer, some of the Shareholders belonging to the "Public" category were inadvertently classified under "promoters" category.	The Company is taking necessary steps to file a fresh application under Regulation 102 SEBI (LODR) Regulations, 2015 seeking dispensation or relaxation of strict compliance with respect to regulation 31A of SEBI (LODR) Regulations, 2015 in the near future for rectifying the errors caused due to classification of certain public shareholders as promoters.
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