



# SHALIBHADRA

## FINANCE LIMITED

CIN : L65923MH1992PLC064886

3, Kamat Industrial Estate,  
396, Veer Savarkar Marg,  
Opp. Siddhi Vinayak Temple,  
Next to Chintamani Jewellers,  
Prabhadevi, Mumbai - 400 025.  
Phone : 2432 2993 / 2432 2994  
2422 4575 / 2438 2607  
2432 3005

E-mail : shalibhadra\_mum@yahoo.co.in

26.05.2023

BSE Limited  
Corporate Relationship Department  
1st Floor, New Trading Ring,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort,  
Mumbai – 400 001.

Dear Sirs,

**Subject: : Annual Secretarial Compliance Report for the Financial Year 2022-23.**

This is with reference to the provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, please find attached Annual Secretarial Compliance Report of the Company for the financial year 2022-23 issued by P. D. PANDYA & ASSOCIATES.

This is for your information and record please.

Thanking you,

**For Shalibhadra Finance Limited**

**MINESH M. DOSHI**

**MANAGING DIRECTOR**

**Din: 01032705**

# P. D. PANDYA & ASSOCIATES

PRACTISING COMPANY SECRETARIES

201, Galaxy Arcade CO-OP HSG. SOC., 57, M G Road, Vile Parle (East), Mumbai - 400 057  
Tel.: 26100693

---

## Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2023

To,  
SHALIBHADRA FINANCE LIMITED,  
3, KAMAT IND. ESTATE, OPP.SIDHI VINAYAK TEMPLE  
VEER SAVARKAR MARG, PRABHADEVI,  
MUMBAI-400025.

We have examined:

- (a) All the documents and records made available to us and explanation provided by Shalibhadra Finance Limited (“the listed entity”),
- (b) The filings/ submissions made by the listed entity to the stock exchange,
- (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, 2023** (“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 there under; and
  - (b) The Securities Contracts (Regulation) Act, 1956 (“SCRA”), Rules made there under and the Regulations, circulars, guidelines issued there under 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-**Applicable to the Company during the Audit Period;**
- (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 -**Not Applicable to the Company during the Audit Period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity)Regulation,2021--**Not Applicable to the Company during the Audit Period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2021 **Not Applicable to the Company during the Audit Period;**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015-- **Not Applicable to the Company during the Audit Period**



- (h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008-  
**Not Applicable to the Company during the Audit Period**
- (i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client and circulars/guidelines issued there under;

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

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	<b><u>Secretarial Standard</u></b>  The compliances of listed entities are in accordance with the Auditing Standards issued by ICSI, namely CSAS-1 to CSAS-3	YES	—
2.	<b><u>Adoption and timely updating 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	—
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> <li>• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/ section of the website</li> </ul>	YES	—
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	—



5.	<p><b><u>To examine 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.</p>	NA	There is no subsidiary companies for the Audit Period
6.	<p><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</p>	YES	—
7.	<p><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</p>	YES	—
8.	<p><b><u>Related Party Transactions:</u></b>  (a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions  (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	—
9.	<p><b><u>Disclosure of events and information:</u></b>  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 there under.</p>	YES	—
10	<p><b><u>Prohibition of Insider Trading</u></b>  The listed entity is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	YES	—
11	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b>  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 there under</p>	No	—
12	<p><b><u>Additional Non-compliances, if any:</u></b></p>	No	—



--	--	--	--

(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

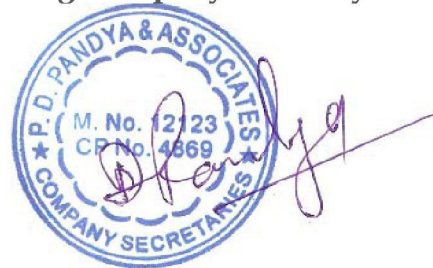
Sr. No	Compliance Requirement(Regulations/ Circulars Guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observation/Remarks of PCS	Management Remarks	Remarks
NA										

(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	Observation/Remarks of PCS	Management Remarks	Remarks
NA										

(c) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under in so far as it appears from my/our examination of those records.

**For Paresh D Pandya & Associates  
Practicing Company Secretary**



**(Paresh Pandya)  
Proprietor**

**ACS No. 12123**

**CP No.: 4869**

**UDIN Number A012123E000368512**

**Place: Mumbai  
Date: 24/05/2023**