

SWOJAS ENERGY FOODS LIMITED

Registered Office - 6L, 10 Floor, 3, Navjeevan Society, Dr. Dadasaheb Bhadkamkar Marg, Mumbai
Central, Mumbai - 400008

Email: swojasenergyfoodsltd@gmail.com, website: www.sefl.co.in

CIN: L15201MH1993PLC358584

Date: 30-05-2023

To
The Manager
Department of Corporate Services
BSE Ltd.
Dalal Street, Fort
Mumbai – 400 001

Sub. - : Submission of Annual Secretarial Compliance Report under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 for the year ended 31st March, 2023

Ref. - : Scrip Code - 530217

Sir / Madam,

Please find enclosed herewith the, Annual Secretarial Compliance Report for the year ended 31st March, 2023 received from **PAYAL TACHAK & ASSOCIATES**, Practicing Company Secretary, pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and amendments thereof.

Kindly take the same on your records and acknowledge the receipt.

Thanking you,

Yours faithfully,

FOR SWOJAS ENERGY FOODS LIMITED

**VISHAL DEDHIA
DIRECTOR
DIN: 00728370**

Encl: as above



PAYAL TACHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

E-mail Id: payaltachakandassociates@gmail.com

Mob: 8169069288

SECRETARIAL COMPLIANCE REPORT OF SWOJAS ENERGY FOODS LIMITED FOR THE FINANCIAL YEAR ENDED 31-03-2023

I have conducted the review of the Compliance of the applicable statutory provisions and the adherence to good corporate practices by **SWOJAS ENERGY FOODS LIMITED** (hereinafter referred as "the listed entity"/"the Company"), having its Registered Office at **6L,10 Floor, 3, Navjeevan Society, Dr. Dadasaheb Bhadkamkar Marg, Mumbai Central Mumbai City 400008**. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my/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, I hereby report that the listed entity has, during the review period covering the financial year ended on 31-03-2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I, CS Payal Tachak have examined:

- a) All the documents and records made available to us and explanation provided by the Company,
- 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 report,

For the financial year ended 31.03.2023 ("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 thereunder; and



PAYAL TACHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

E-mail Id: payaltachakandassociates@gmail.com

Mob: 8169069288

- 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during review 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 review period)**
- e) Securities and Exchange Board of India (Share based employee Benefits and Sweat Equity) Regulations, 2021 **(Not Applicable to the Company during review period)**
- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the Company during review period)**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

And based on the above examination, I 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 in respect of matters specified below:

S N	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Re-marks of the Practicing Company Secretary	Management response	Remark
1	The listed entity shall publish information in the newspaper: financial	Regulations 47 of SEBI (Listing Obligation and Disclosure Requirement	Non-Compliance with Regulation 47 of SEBI (LODR) Reg. 2015	None	Advisory	News Paper Advertise ment for Quarter ended 31-03-2022	NA	Lapse in Compliance with Regulation 47 of the SEBI (LODR)	Company is making sure to be in compliance with the SEBI (LODR)	NA

ADD: 505/D, SAI ABHYUDAY COMPLEX, ZERO ROAD, MORYA NAGAR, NEAR FUN FIESTA, NALLASOPARA WEST, PALGHAR 401203



PAYAL TACHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

E-mail Id: payaltachakandassociates@gmail.com

Mob: 8169069288

S N	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Re-remarks of the Practising Company Secretary	Management response	Remark
	results, as specified in regulation 33, along-with the modified opinion(s) or reservation(s), if any, expressed by the auditor:	ts) Regulations, 2015				not published		Regulations. 2015	Regulation, 2015	

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

S N	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Re-remarks of the Practising Company Secretary	Management response	Remark
1	Annual Listing fees	Regulation 14 of SEBI (LODR) Regulation, 2015	Listing fees was not paid as per Regulation 14	BSE Limited	Clarifications and Show cause notices	Non-Compliance of Regulation 14	14,16,000	Annual Listing fees Paid under Protest on 15/03/2021.	In compliance with the order of Hon'ble Supreme Court, the Company deposited an amount of Rs. 14,16,000 under protest with BSE which was demanded by BSE towards "Compensation for unpaid Listing fess" and a bill dated 26-12-2019 was available for it. However, there is no	Case is resolved and the suspension at BSE Limited is revoked by the exchange as on the date of this report



PAYAL TACHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

E-mail Id: payaltachakandassociates@gmail.com

Mob: 8169069288

S N	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Regulation/circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Re-marks of the Practicing Company Secretary	Management response	Remark
									provisions under LODR to pay such Compensation and despite repeated requests by Company to BSE, BSE did not provide copies of yearly ALF invoices raised by BSE from FY 2015-2016 onwards to Company.	

- II. Compliances related to resignation of Statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019: - **Not applicable as there was no resignation of Statutory Auditors**

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



PAYAL TACHAK & ASSOCIATES

PRACTISING COMPANY SECRETARIES

E-mail Id: payaltachakandassociates@gmail.com

Mob: 8169069288

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 PAYAL TACHAK & ASSOCIATES,
PRACTICING COMPANY SECRETARY**

**CS PAYAL TACHAK
PRACTICING COMPANY SECRETARY
M. NO.: A38016
C.P.: 15010
PLACE: PALGHAR
DATE: 30/05/2023
UDIN: A038016E000427064**