



S.R. Industries Limited

CIN: L29246PB1989PLC009531

Regd. Off.: E-217, Industrial Area, Phase 8B
Mohali, Punjab - 160071

Website: www.srfootwears.com

Email: info@srfootwears.com

Tel: +91 172 4602888

To,
The Manager (Listing)
The Bombay Stock Exchange Limited
Phiroze Jee Jeebhoy Tower
25th Floor, Dalal Street
Mumbai - 400 001

Date: 05.07.2021

Ref: Scrip Code - 513515 Symbol - SRIND

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Dear Sir/ Madam,

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8th, 2019, please find attached herewith the Annual Secretarial Compliance Report for the financial year ended March 31st, 2021 issued by Practising Company Secretary.

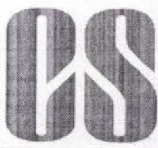
Request you to kindly acknowledge and take the same on your record.

Thanking you,

Yours Faithfully,
For **S.R. Industries Limited**

(Amit Mahajan)
Chief Financial Officer
DIN: 00038593

Encl: Annual Secretarial Audit Report



SECRETARIAL COMPLIANCE REPORT

of

S R INDUSTRIES LIMITED

(CIN: L29246PB1989PLC009531)

(for the year ended 31st March 2021)

I have examined:

- (a) all the documents and records made available to us and explanation provided by S R INDUSTRIES 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 31st March 2021 ("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; **The company has complied with the provisions of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015, required during the financial year. However, in some cases of delay, the penalty/fine has been paid by the Company.**
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Complied**
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **Complied**
- (d) Securities and Exchange Board of India (Buy-back of Securities) Regulations, 2018; - **Not applicable**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **Not applicable**



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **Not applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - **Not applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; **Complied**
- (i) Securitization and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002;

Based on the above examination, I 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: -

Sr.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	State Bank of India vs S R Industries Limited in Debt Recovery Tribunal	NA	Latest hearing held on 25/5/2021 The matter is under process. Due date for hearing on 13 th September, 2021.
2	UCO Bank vs S R Industries Limited in Debt Recovery Tribunal	NA	Latest hearing held on 21/5/2021. The matter is under process. Due date for hearing on 6 th September, 2021.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) There are no 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
NA				



(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	SARFASI Notice under Sec 13(2) From State Bank of India for Default in repayment to SBI and UCO Bank to the tune of Rs. 34,13,36,192.89	For the year ended 31 st March 2021	The Company had entered into OTS with SBI. The Company is still in process of resolving the issues and settling the dues.	State Bank of India vs S R Industries Limited in Debt Recovery Tribunal is pending for hearing.
2	SARFASI Notice under sec 13-2 Form State Bank of India for Default in repayment to SBI and UCO Bank to the tune of Rs. 34,13,36,192.89	For the year ended 31 st March 2021	The Company is still in process of resolving the issues and settling the dues.	UCO Bank vs S R Industries Limited is due for hearing.



 (R.P.S. Khurana)

For R.P.S Khurana & Associates
 UDIN: A012333C000524383
 Membership No.: 12333
 CP. No.: 5013

Place: Chandigarh
 Date: 28TH June, 2021