

SHRENIK LIMITED

Reg. Office : 1009, Shivalik Shilp, Iscon Cross Road, Ahmedabad, 380015 (Gujarat)
Website: www.shrenikltd.com **CIN No.:**L51396GJ2012PLC073061
Email Id: info@shrenik.co.in, **Ph. No.:** 7600074695

Date: 23.05.2024

To,
The Manager,
The National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051,
Maharashtra, India

**Sub: Submission of Annual Secretarial Compliance Report for the year ended
31st March, 2024**

COMPANY SYMBOL: SHRENIK

Dear Sir,

With respect to the captioned subject please find Annual Secretarial Compliance Report for the year ended 31st March, 2024 under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Please take into your records.

Thanking You,

Yours faithfully,

FOR, SHRENIK LIMITED

RISHIT VIMAWALA
WHOLE TIME DIRECTOR
DIN: 03474249



JAYMEEN TRIVEDI AND ASSOCIATES

Company Secretaries & Trademark Agent

B-1011, Sivanta One Business Park,

Nr. Paldi Cross Roads, Paldi,

Ahmedabad - 380007

(M) +91-9328222069 - (O)+91-79-27542504

email - jtrivedi86@gmail.com

Secretarial Compliance Report of SHRENIK LIMITED for the financial year ended 31st March, 2024

To,

SHRENIK LIMITED

10th Floor-1009, Shivalik Shilp, Iscon Cross Road,
Ambli-Bopal Road, S.G. Highway, Ahmedabad, 380015
Gujarat.

I Jaymeen Trivedi proprietor of M/s. Jaymeen Trivedi & Associates, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by **SHRENIK LIMITED** (CIN: L51396GJ2012PLC073061) ("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, 2024 ("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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the listed entity during the Review Period)**



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- (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 listed entity during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the listed entity during the Review Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and 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 included) | 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 |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|--|---------------------|---------|
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|--|---------------------|---------|



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| | ding speci fic claus e) | | | | | | | | | |
|---|---|--|---|-----|---------------|---|-----|---|--|---|
| 1 | Regulation 31 of SEBI (LODR) Regulations, 2015 pertaining to Shareholding pattern | Regulation 31 of SEBI (LODR) Regulations, 2015 | The deviation / Difference is in the no. of shares held by Mr. Shrenik Sudhir Vimawala as compared to Depositories data in the Shareholding Pattern submitted for the quarter ended 30 th June, 2023 | NSE | Clarification | - | Nil | Company has replied to the NSE by giving clarification and submit the revised Shareholding Pattern, after that no further correspondence received from the NSE by the company | The company replied to the NSE giving clarification and also submit the revised Shareholding Pattern to that effect and the said difference is reflected due to the sale of shares by Mr. Shrenik Sudhir Vimawala. | - |



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|---|---|--|--|-----|---------------|---|-----|---|--|---|
| 2 | Regulation 31 of SEBI (LODR) Regulations, 2015 pertaining to Shareholding pattern | Regulation 31 of SEBI (LODR) Regulations, 2015 | The deviation / Difference is in the no. of shares held by Mr. Shrenik Sudhir Vimawala as compared to Depositories data in the Shareholding Pattern submitted for the quarter ended 30 th September, 2023 | NSE | Clarification | - | Nil | Company has replied to the NSE by giving clarification and submit the revised Shareholding Pattern, after that no further correspondence received from the NSE by the company | The company replied to the NSE giving clarification and also submit the revised Shareholding Pattern to that effect and the said difference is reflected due to the sale of shares by Mr. Shrenik Sudhir Vimawala. | - |
| 3 | Regulation 31 of SEBI (LODR) Regulations, 2015 | Regulation 31 of SEBI (LODR) Regulations, 2015 | The deviation regarding Table VI regarding Statement showing foreign | NSE | Clarification | - | Nil | Company has replied to the NSE by giving clarification and | The company replied to the NSE giving clarific | - |



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| | pertain ing to Shareh olding patter n | | ownership limits in the sharehold ing pattern for the quarter ended 31 st December, 2023 | | | | | submit the revised Sharehol ding Pattern, after that no further correspo dance received from the NSE by the company | ation and also submit the revised Shareh olding Pattern to that effect. | |
| 4 | Regula tion 27(2) of SEBI (LODR) Regula tions, 2015 pertain ing to Corpor ate Govern ance | Regulation 27(2) of SEBI (LODR) Regulation s, 2015 | The deviation is to send correct/co mplete details for the same for the quarter ended 31 st December, 2023 | NSE | Revision | - | Nil | Company has submitte d the revised report as suggeste d by the NSE. | The compa ny has submitte d the revised Corporate Govern ance Report as sugges ts by NSE. | - |
| 5 | Regula tion 27(2) of SEBI (LODR) Regula tions, 2015 | Regulation 17, 18, 19 of SEBI (LODR) Regulation s, 2015 pertaining to Board Compositi | Non - complianc e of Regulation 17, 18, 19 of SEBI (LODR) Regulation s, 2015 | NSE | Clarificat ion | Non- complia nce of Regulati ons 17, 18, 19 of SEBI (LODR) Regulati | Nil | The company has replied to NSE by giving clarificati on regardin | The compa ny has provid e the clarific ation regardi ng the | |



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| | pertain ing to Corpor ate Govern ance FOR 31 ST March, 2024 | on | | | | ons, 2015 from January 25, 2024 to Februar y 10, 2024 | | g non - complan ce and after that no further correspo dance received from the NSE by the company | same and after that no corresp ondanc e receive d from the NSE. | |
| 6 | Regula tion 23(9) of SEBI (LODR) Regula tions, 2015 | Regulation 23(9) of SEBI (LODR) Regulation s, 2015 | Non- complain ce of 23(9) of SEBI (LODR) Regulation s, 2015 for 31 st March, 2023 | NSE | Notice for non- complan ce | Delay in submissi on of Disclosu re of Related Party Transact ion by 4 days as per Regulati on 23(9) of SEBI (LODR) Regulati ons, 2015 | 23600/ - | With respect to the notice received dated 30 th June, 2023 regardin g non complan ce of Regulatio n 23(9) of SEBI (LODR) Regulatio ns, 2015, the company has applied for waiver of fine to NSE and after that no | the compa ny has applied for waiver of fine to NSE and after that no further corresp ondanc e receive d from the NSE by the compa ny and the Board will pay special | - |



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| | | | | | | | | further correspo dance received from the NSE by the company | attenti on to the compli ance. | |
|--|--|--|--|--|--|--|--|--|--|--|

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

| Sr. No. | Com- plianc e Requir e- ment (Regu- lations / circula rs/ guide- lines includi ng specifi c clause) | Regu- lation/ Circul arNo. | Deviation s | Action Take nby | Type of Action | Details of Violation | Fine Amou nt | Obser- vations / Remar ks of the Practici ng Compa ny Secreta ry | Man- age- ment Re- spons e | Re- mark s |
|---------|--|---|--|-----------------------|-------------------|--------------------------------------|--------------------|---|--|------------------|
| 1 | Regulation 27(2) of SEBI (LODR) Regulations, 2015 pertaining to | Regulation 27(2) of SEBI (LODR) Regulations, 2015 | The deviation is to send correct/complete details for the same | NSE | Revision | Company has submitted the incomplete | Nil | Company has submitted the revised report as suggested by the NSE. | The company has submitted the revised Corporate Govern | - |



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| | Corporate Governance | | | | | | | | ance Report as suggests by NSE. | |
|---|---|--|---|-----|---------------|---|-----|---|--|---|
| 2 | Regulation 31 of SEBI (LODR) Regulations, 2015 pertaining to Shareholding pattern | Regulation 31 of SEBI (LODR) Regulations, 2015 | The deviation / Difference is that there is change in number of Promoters in the Shareholding Pattern submitted for the quarter ended 31st December, 2022 | NSE | Clarification | There is Difference in the number of promoters in the Shareholding Pattern for the quarter ended 31st December, 2022 as compared to the previous quarter. | Nil | Company has replied to the NSE by giving clarification and submit the revised Shareholding Pattern, after that no further correspondence received from the NSE by the company | The company replied to the NSE giving clarification and also submit the revised Shareholding Pattern to that effect. | - |



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- I. I/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. | Secretarial Standards: 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 | |
| 2. | Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI | Yes Yes | |
| 3. | Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/information under a separate section on the websiteWeb-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to | Yes Yes Yes | |



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| | the relevant document(s)/ section of the website | | |
| 4. | Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | |
| 5. | Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries | NA | The company does not have Material Subsidiary Company |
| 6. | Preservation of Documents: 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 | |
| 7. | Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations. | Yes | |



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| 8. | Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (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. | Yes Yes | All related party transactions were entered after obtaining approval of the Audit Committee |
| 9. | Disclosure of events or information: 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. | Yes | |
| 10. | Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015. | Yes | |
| 11. | Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column. | Yes | No action has been taken |



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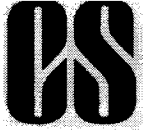
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| 12. | Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / 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 | As there is no such event of resignation of the Statutory Auditors during the period under review. |
| 13. | Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. [No other non-compliance except mentioned above in table (a)]. | Yes | |

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.



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Disclaimer: We have conducted the assignment by examining the Secretarial Records and other records etc., and the same are maintained at the Registered office of the company situated at Ahmedabad.

Place: Ahmedabad
Date: 22.05.2024

For, JAYMEEN TRIVEDI & ASSOCIATES
Company Secretaries



Jaymeen Trivedi
Proprietor
FCS No.: 9137
C P No.:10035
UDIN: F009137F000423034
PR Certificate No: 2936/2023