



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
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SECRETARIAL COMPLIANCE REPORT OF SHRENIK LIMITED FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2021

(Pursuant to Circular- CIR/CFD/CDM1/ 27/2019 Dated February 08,2019)

To,
SHRENIK LIMITED
505-508, TEN/11, BESIDE MARDIA PLAZA,
C.G. ROAD, AHMEDABAD-380009
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 me through electronically by way of scan copy or soft copy through email ~~or otherwise~~ 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, 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");





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Apart from the above, 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, as amended from time to time;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;
- (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) Regulations, 2014; (**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 and Redeemable Preference Shares) Regulations, 2013; (**Not Applicable to the listed entity during the Review Period**);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;
- (i) SEBI (Delisting of Equity Shares) (Amendment) Regulations, 2016 (**Not Applicable to the listed entity during the Review Period**);
- (j) Securities and Exchange Board of India (Issue and Listing of Securitised Debt Instruments and Securities Receipts) Regulations, 2008, (**Not Applicable to the listed entity during the Review Period**);





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(k) SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003 (**Not Applicable to the listed entity during the Review Period**);

(l) SEBI (Issue of Sweat Equity) Regulations, 2002, (**Not Applicable to the listed entity during the Review Period**);

(m) SEBI (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 as amended from time to time;

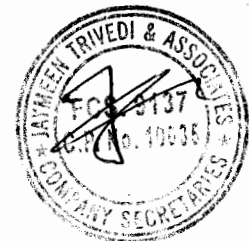
(n) SEBI (Depositories and Participants) Regulations, 2018 as amended from time to time;

(o) SEBI (Investor Protection and Education Fund) Regulations, 2009;

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 including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Violation under SEBI (PIT) Regulations, 2015 relating to code of conduct as per circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23 rd July, 2020 and NSE Circular NSE/CML/2020/44 dated 26 th August, 2020	The designated person and his immediate relative purchased the shares of the company during the period when the trading window was closed	Concern person paid the relevant amount of penalty to IPEF.





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

(c) The following are the details of 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.
1	National Stock Exchange of India Limited	Regulation 17 (1) of SEBI (LODR) Regulations, 2015	Fine: Rs. 159300/-	The fine was paid by the company. However, a request for the waiver letter of the penalty as was submitted by the company to the NSE

(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
Not Applicable				





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I, further report that the company has prima facie complied with and included the conditions as mentioned in Para 6 (A) and 6 (B) of the SEBI Circular No. CIR/ CFD/ CMD1/ 114/2019 dated October 18, 2019 in terms of appointment of Statutory auditor of the company.

Place: Ahmedabad
Date: 27.05.2021

For, JAYMEEN TRIVEDI & ASSOCIATES,
Company Secretaries



Jaymeen Trivedi
FCS No.: 9137
C P No.:10035
CINSEB09137C000378990

Note:

1. Due to COVID-19 pandemic, I have conducted the assignment by examining the Secretarial Records, as facilitated by the company by way of electronic mode for the purpose of issuing this report. The management has confirmed that the records submitted to me are true and correct.
2. Keeping Secretarial and compliance records true, correct and up to date is the responsibility of the management.