

Date: 31.05.2021

To,  
BSE Limited,  
Corporate Relationship Department,  
1st Floor, New Trading Ring, PJ Tower,  
Dalal Street, Mumbai - 400 001

Scrip Code: 503696

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup>March, 2021.

Respected Sir/Madam,

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, we hereby submit the Annual Secretarial Compliance Report received from M/ s Pramod S. Shah & Associates, Practicing Company Secretary for the Financial Year ended 31<sup>st</sup>March, 2021.

Kindly take the same on your record and oblige.

Thanking you,

Yours faithfully,

For Shreenath Investment Company Limited



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Vikas Mapara  
Managing Director  
DIN: 00211580

**SECRETARIAL COMPLIANCE REPORT OF**  
**SHREENATH INVESTMENT COMPANY LIMITED**  
**FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

We have examined:

- a) All the documents and records made available to me and explanation provided by Shreenath Investment Company Limited ("the listed entity"),
- b) The filings/submission 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') and the rules made thereunder and 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018:- **Not Applicable during the period under review;**
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018:- **Not Applicable during the period under review;**

## Pramod S. Shah & Associates

Practising Company Secretaries

3rd Floor, LA-SHEWA Bldg., Next to Fedex, 233, P. D' Mello Road, Opp. St. George Hospital, Near CST, Mumbai - 400 001.  
Tel. : 91-22-2271 7700 / 91-22-2270 1040 • Email : saurabhshah@psaprofessionals.com • Website : cpsa.co.in

- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not Applicable during the period under review;**
- f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008:- **Not Applicable during the period under review;**
- g) The Securities and Exchange Board of India (Issue and Listing of NonConvertible and Redeemable Preference Shares) Regulations, 2013:- **Not Applicable during the period under review;**
- h) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/guidelines issued thereunder;

and based on the above explanation, 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 there under so far as it appears from our examination of those records.
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my examination of those records.
- c) There was no action taken against the listed entity/ its promoters/ directors 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.
- d) The listed entity has taken the following actions to comply with the observations made in previous reports:

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<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
<b>NIL</b>				

We would like to state that due to COVID – 19 pandemic, we have not been able to physically verify the records of the Company for the purpose of our current audit and have instead placed our reliance solely on the contents of electronically signed / scanned copies of the records, documents, papers, information, explanation etc. provided to us by the Company and its officers and agents in electronic form.

**For Pramod S. Shah & Associates**

**Date: 31<sup>st</sup> May 2021**  
**Place: Mumbai**

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**Pramod S. Shah - Partner**  
**Membership No. 334 (FCS)**  
**C. P. No. : 3804**  
**UDIN: F000334C000396422**