

Shreenath Investment Company Limited

CIN : L67120MH1979PLC022039

Date: 28th July, 2020

To,
Corporate Relationship Department,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001

Script Code: 503696

Sub: Submission of Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2020.

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 Kaushal Dalal & Associates, Practicing Company Secretary for the Financial Year ended 31st March, 2020.

Kindly take the same on your records.

Thanking You.

Yours faithfully,
For Shreenath Investment Company Limited



Vikas Harilal Mapara
Managing Director
DIN: 00211580

Encl: as above

KAUSHAL DALAL & ASSOCIATES
COMPANY SECRETARIES

308, Balaji Darshan, Tilak Road, Santacruz (W), Mumbai - 400 054. * Email : kaushaldalalcs@gmail.com

**SECRETARIAL COMPLIANCE REPORT
OF
SHREENATH INVESTMENT COMPANY LIMITED**

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2020

I 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, 2020 (“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;**

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- 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;**
 - 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 Non-Convertible 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 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
NIL			

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- 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 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.
NIL				

- 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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For Kaushal Dalal & Associates
Practicing Company Secretaries

Date: 25th July, 2020
Place: Mumbai

Kaushal Dalal
Proprietor
Membership No.: FCS 7141
CoP No.:7512
UDIN:- F007141B000504583