

Date: 30.05.2024

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

Dear Sir/Madam,

**Scrip Code: 503696**

**Sub: Furnishing Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2024 as required under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as provided by M/s. Pramod S. Shah & Associates, Practicing Company Secretaries, Mumbai**

Pursuant to the Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, BSE Notice No. 20230316-14 dated March 16, 2023 we hereby submit the Annual Secretarial Compliance Report received from M/ s Pramod S. Shah & Associates, Practicing Company Secretaries for the Financial Year ended 31<sup>st</sup> March, 2024.

Kindly take the same on your record and oblige.

Thanking you,

Yours faithfully,

**For Shreenath Investment Company Limited**

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**Jatin Ramanlal Jain**  
**Managing Director**  
**DIN: 08521872**  
**Place: Mumbai**

# 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.  
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## ANNUAL SECRETARIAL COMPLIANCE REPORT OF SHREENATH INVESTMENT COMPANY LIMITED FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2024

I Pramod S. Shah, Partner of Pramod S. Shah & Associates, a firm of Practising Company Secretaries, 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, 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 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;**
- 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;
- j) Any other regulations and circulars / guidelines issued thereunder; as may be applicable to the Company.

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 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 in so far 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:

<u>Sr.no.</u>	<u>PARTICULARS</u>	<u>COMPLIANCE STATUS (YES/NO/NA)</u>	<u>OBSERVATIONS/REMARKS BY PRACTICING COMPANY SECRETARY</u>
1.	<p><b><u>Secretarial Standards:</u></b></p> <p>The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)</p>	Yes	-
2.	<p><b><u>Adoption and timely updation of the Policies:</u></b></p> <p>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company</p> <p>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</p>	Yes	-
3.	<p><b><u>Maintenance and disclosures on Website:</u></b></p>	Yes	-

	<p>The Company is maintaining a functional website.</p> <p>Timely dissemination of the documents/ information under a separate section on the website.</p> <p>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</p>		
4.	<p><b><u>Disqualification of Director:</u></b></p> <p>None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013</p>	Yes	
5.	<p><b><u>To examine details related to Subsidiaries of listed entities:</u></b></p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries</p>	NA	

6.	<p><b><u>Preservation of Documents:</u></b></p> <p>The Company 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.</p>	Yes	-
7.	<p><b><u>Performance Evaluation:</u></b></p> <p>The Company has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations</p>	Yes	-
8.	<p><b><u>Related Party Transactions:</u></b></p> <p>(a) The Company has obtained prior approval of Audit Committee for all Related party transactions</p> <p>(b) In case no prior approval obtained, the Company shall provide</p>	Yes	-

	detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee		
9.	<p><b><u>Disclosure of events or information:</u></b></p> <p>The Company 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.</p>	Yes	-
10.	<p><b><u>Prohibition of Insider Trading:</u></b></p> <p>The Company is in compliance with Regulation 3(5) &amp; 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015</p>	Yes	-
11.	<p><b><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></b></p> <p>No Actions taken against the Company / its promoters/ directors/ subsidiaries either by</p>	NA	-

	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		
12.	<b><u>Additional Non-compliances, if any:</u></b>  No any additional non-compliance observed for all SEBI regulation/ circular/guidance note etc	NA	-

and based on the above examination, we 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 the matters specified below:

<u>SR</u>	<u>COMPLIANCE REQUIREMENTS (REGULATIONS/ CIRCULARS/ GUIDELINES INCLUDING SPECIFIC CLAUSE)</u>	<u>REGULATION/ CIRCULAR</u>	<u>DEVIATION/ CIRCULARS</u>	<u>ACTION TAKEN BY</u>	<u>TYPE OF ACTION (ADVISORY/ CLARIFICATION/ FINE/ SHOW CAUSE NOTICE/ WARNING. ETC.)</u>	<u>DETAILS OF VIOLATION</u>	<u>FINE ANNO UNCED</u>	<u>OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY</u>	<u>MANAGEMENT RESPONSE</u>	<u>REMARKS</u>
Not Applicable										

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

# Pramod S. Shah & Associates

Practising Company Secretaries

<u>SR</u>	<u>COMPLIANCE</u> <u>REQUIREMENTS</u> <u>(REGULATIONS/</u> <u>CIRCULARS/</u> <u>GUIDELINES</u> <u>INCLUDING</u> <u>SPECIFIC CLAUSE)</u>	<u>REGULA</u> <u>TION/CI</u> <u>RCULAR</u>	<u>DEVI</u> <u>ATIO</u> <u>NS</u>	<u>ACTION</u> <u>TAKEN</u> <u>BY</u>	<u>TYPE</u> <u>OF</u> <u>ACTION</u> <u>(ADVISORY/CL</u> <u>ARIFICATION/F</u> <u>INE/SHOW</u> <u>CAUSE NOTICE/</u> <u>WARNING,</u> <u>ETC.)</u>	<u>DETAILS</u> <u>OF</u> <u>VIOLATIO</u> <u>N</u>	<u>FINE</u> <u>ANNO</u> <u>UNCED</u>	<u>OBSERVATIO</u> <u>NS/REMARK</u> <u>S OF THE</u> <u>PRACTICING</u> <u>COMPANY</u> <u>SECRETARY</u>	<u>MANAGEM</u> <u>ENT</u> <u>RESPONS</u> <u>E</u>	<u>REMAR</u> <u>KS</u>
Not Applicable										

For Pramod S. Shah & Associates

PRAMOD  
SHANTILAL SHAH

Digitally signed by  
PRAMOD SHANTILAL SHAH  
Date: 2024.05.30 18:38:34  
+05'30'

**Pramod S. Shah - Partner**  
**Membership No. 334 (FCS)**

**C. P. No.: 3804**

**UDIN:**

**Date: 30th May 2024**

**Place: Mumbai**