

**Secretarial compliance report of Shreyans Industries  
Limited for the year ended 31<sup>st</sup> March, 2021**

I, Parminder Singh Bathla, Practicing Company Secretary, in the name of P S BATHLA & ASSOCIATES (FCS NO. 4391, Certificate of Practice No. 2585) have examined:

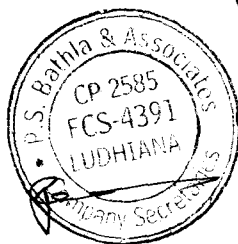
- (a) all the documents and records made available to us and explanation provided by Shreyans Industries Limited (“the listed entity”),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,.

for the year ended 31<sup>st</sup> 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”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

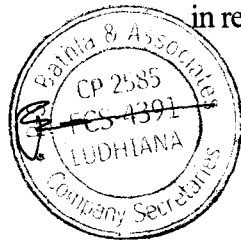
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015; (as applicable)
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (No such event occurred during the Review Period and thus not applicable)



- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (as applicable)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (No such event occurred during the Review Period and thus not applicable)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (No such event occurred during the Review Period, and thus not applicable)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (No such event occurred during the Review Period and thus not applicable)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (No such event occurred during the Review Period and thus not applicable)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; (as applicable)

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 as specified below:



# P.S. Bathla & Associates

COMPANY SECRETARIES

S.C.O.-6, 3rd Floor,  
Feroze Gandhi Market, Ludhiana - 141 001.

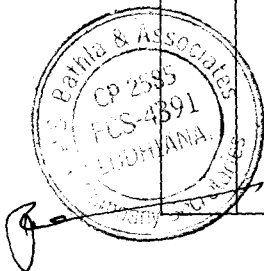
Ph.: (O) 4416791

Mobile : 9814117434, 9216502700

E-mail : { bathla7@gmail.com  
bathlaps@rediffmail.com

Website : www.psbathla.com

Sr. No.	Compliance Requirement (Regulations / Circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1	<p>As per Regulation 17(1) of SEBI (LODR) Regulations, 2015, if chairperson of the Board of Directors is non-executive Directors then at least 1/3rd of the Board members shall comprise of Independent Directors and if the listed entity does not have regular non-executive chairperson than half of the Board shall comprise of Independent Directors. Further, if the regular non executive chairperson is a promoter or related to promoters than half of the Board shall comprise of Independent Directors.</p>	<p>On account untimely and sudden death of Independent Director on 15<sup>th</sup> July 2019, the casual vacancy arised and then fulfilled by the Board in their next meeting on 13th November 2019.</p> <p>This caused a delay of 29 days to fill the vacancy.</p>	<p>As explained to us, the Company, due to sudden death of Independent Director, the Board Members made an extensive search to finalise a suitable person. This was completed on November 13, 2019 (in very next Board Meeting).</p> <p>The NSE &amp; BSE each had levied fine of Rs. 145,000 (plus 18% GST), on which the Company also filed waiver application with both exchanges. The NSE not approved the waiver application on 22nd June, 2020 and thereafter Company paid the fine amount on 7th July, 2020. The BSE has not intimated its decision on the subject yet.</p>



# *P.S. Bathla & Associates*

COMPANY SECRETARIES

S.C.O.-6, 3rd Floor,  
Feroze Gandhi Market, Ludhiana - 141 001.

Ph.: (O) 4416791

Mobile : 9814117434, 9216502700

E-mail : { bathla7@gmail.com  
bathlaps@rediffmail.com

Website : www.psbathla.com

- (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/our examination of those records.
- (c) There was no action 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.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not applicable as there were no observations which require action.

**Dated: 11<sup>th</sup> May, 2021**  
**Place : Ludhiana**  
**UDIN: F004391C000272219**

**For P. S. Bathla & Associates**  
**Company Secretaries**



**P.S. Bathla**  
**CP No-2585**  
**M. No. 4391**  
**Proprietor**

**NOTE:**

The Secretarial Compliance is the responsibility of Management. My responsibility is to express an opinion on such compliance. This Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.