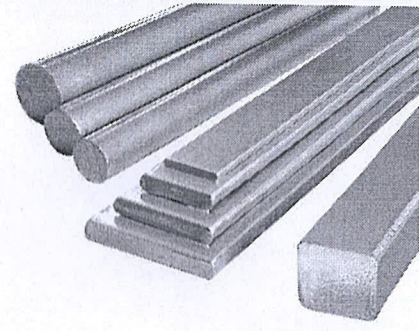


Sharda Ispat Ltd.

Regd. Off.: Kamptee Road, Nagpur - 44 00 26
Tel.: 0712 - 2245156, 2245888, | Email: shardaispat.ngp@gmail.com
Website: www.shardaispat.com | CIN No.: L74210MH1960PLC011830



Date: - 30.05.2023

To,
The Department of Corporate Services,
Bombay Stock Exchange Limited,
1st Floor, New Trading Wing,
Rotunda Building, P.J. Towers,
Dalal Street, Fort,
Mumbai -400001

SHARDA ISPAT LIMITED

SUB: Annual Secretarial Compliance Report – Financial Year 2022-23
SCRIP CODE :-513548

Sir/ Madam,

With reference to the captioned subject and in pursuance of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time, please find enclosed herewith Secretarial Compliance Report for the Year ended on March 31, 2023, issued by Sunil Kumar Sharma & Associates, Practicing Company Secretary, for your information and records.

Kindly requested you to take note of the above.

For **SHARDA ISPAT LIMITED**,

Amit B.Mundada
Company Secretary &
Compliance officer



Encl:- As above



SUNIL KUMAR SHARMA & ASSOCIATES

Sunil Kumar Sharma

(Practicing Company Secretaries)

Phone No: +91-9309702402, +91-7709885236

Email: cssunsharma7@gmail.com

Off Add-2nd Floor Samarth Building Sona Restaurant Square C.A. Road Gandhibagh Nagpur-02MH

**SECRETARIAL COMPLIANCE REPORT
OF
M/S. SHARDA ISPAT LIMITED
FOR THE YEAR ENDED MARCH 31, 2023**

[Pursuant to Circular CIR/CFD/ CMDI/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

TO,
M/S. SHARDA ISPAT LIMITED,
CIN: L74210MH1960PLC011830
KAMPTEE ROAD,
NAGPUR (MS) 440026

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Sharda Ispat Limited (hereinafter referred as 'the listed entity'), having its Registered Office at Kamptee Road, Nagpur-440026. Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and to provide my observations thereon. Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review. I hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

I have examined:

- a) all the documents and records made available to us and explanation provided by M/s Sharda Ispat Limited (hereinafter referred to as "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 report.

for the year ended 31st March, 2023 ("Review Period") in respect of compliance with the provisions of:





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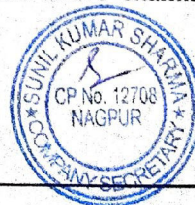
Off Add-2nd Floor Samarth Building Sona Restaurant Square C.A. Road Gandhibagh Nagpur-02MH

- (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 there under 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 to the listed entity during the audit period);**
- 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 to the listed entity during the audit period);**
- e). The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the listed entity during the audit period);**
- f). The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the audit period);**
- g). The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h). The Securities and Exchange Board of India (Depositories and Participant) Regulations 2018;
- i). The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j). The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable to the listed entity during the audit period);**

and circulars/guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:





SUNIL KUMAR SHARMA & ASSOCIATES

Sunil Kumar Sharma

(Practicing Company Secretaries)

Phone No: +91-9309702402, +91-7709885236

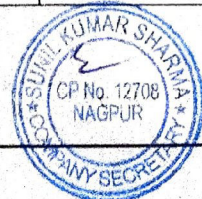
Email: essunsharma7@gmail.com

Off Add-2nd Floor Samarth Building Sona Restaurant Square C.A. Road Gandhibagh Nagpur-02MH

- a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued there under.

Based on my examination and verification of the documents and records produced to me and according to the information and explanations given to me by the Company, I report that: -

| Sr. No. | Particulars | Compliance Status (Yes/No/NA) | Observations/Remarks by PCS* |
|---------|---|-------------------------------|------------------------------|
| 1. | <u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI). | Yes | |
| 2. | <u>Adoption and timely updation of the Policies:</u> a. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company. b. All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/ guidelines issued by SEBI | Yes | |
| 3. | <u>Maintenance and disclosures on Website:</u> a. The Company is maintaining a functional website b. Timely dissemination of the documents/ information under a separate section on the website c. Web-links provided in annual corporate governance reports under Regulation | Yes | |





SUNIL KUMAR SHARMA & ASSOCIATES

Sunil Kumar Sharma

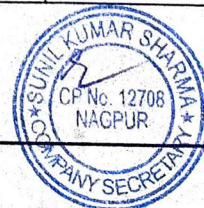
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| | | | |
|----|---|-----|--|
| | 27 (2) are accurate and specific which redirects to the relevant document(s)/ section of the Website | | |
| 4. | Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity. | Yes | |
| 5. | Details related to Subsidiaries of listed entities have been examined with respect to: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries | Yes | |
| 6. | Preservation of Documents: The listed entity 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. | Yes | |
| 7. | Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations. | Yes | |
| 8. | Related Party Transactions: The listed entity has obtained prior approval of Audit Committee for all related party transactions; or | Yes | |



**SUNIL KUMAR SHARMA & ASSOCIATES**

Sunil Kumar Sharma

(Practicing Company Secretaries)

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Email: essunsharma7@gmail.comOff Add-2nd Floor Samarth Building Soma Restaurant Square C.A. Road Gandhibagh Nagpur-42MH

| | | | |
|-----|--|-----|--|
| 9. | Disclosure of events or information: The listed entity 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. | Yes | |
| 10. | Prohibition of Insider Trading: The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015 | Yes | |
| 11. | Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the Company/ its promoters/ directors/ subsidiaries either by 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 | Yes | |
| 12. | Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc. | Yes | |

a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.

| Sr. No. | Compliance Requirement (Regulations/ circulars/ guidelines including | Regulation/ Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|
|---------|--|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|





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| | | | | | | | | | | |
|------------------|--|--|--|--|--|--|--|--|--|--|
| specific clause) | | | | | | | | | | |
| Not Applicable | | | | | | | | | | |

(b) The Company was not required to take any action with regard to compliance with the observations made in previous reports as the same was not applicable.

| Sr. No. | Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) | Regulation/ Circular No. | Deviations | Action Taken by | Type of Action | Details of Violation | Fine Amount | Observations/ Remarks of the Practicing Company Secretary | Management Response | Remarks |
|----------------|---|--------------------------|------------|-----------------|----------------|----------------------|-------------|---|---------------------|---------|
| Not Applicable | | | | | | | | | | |

Place: Nagpur
Date: 30/05/2023



SUNIL KUMAR SHARMA
Company Secretary
M.No.: 10043 C.P. No. 12708
UDIN: F010043E000426008