



# 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: - 17.05.2025

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

## SHARDA ISPAT LIMITED

**SUB: Annual Secretarial Compliance Report – Financial Year 2024-25**  
**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 read with SEBI Master Circular dated 11<sup>th</sup> November, 2024, please find enclosed herewith the Annual Secretarial Compliance Report for the Year ended on March 31, 2025, 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 Bankatlal**  
**Mundada**

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Bankatlal Mundada

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Amit B.Mundada  
Company Secretary &  
Compliance officer

Encl:- As above



**SUNIL KUMAR SHARMA & ASSOCIATES**

**Sunil Kumar Sharma**

**(Practicing Company Secretaries)**

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

**Email:cssunsharma7@gmail.com**

**Off Add-2<sup>nd</sup> 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, 2025

[Pursuant to Regulation 24A (2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,  
The Board of Directors,  
SHARDA ISPAT LIMITED,

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 31<sup>st</sup> March, 2025 ("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 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) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements), Regulations, 2018; **(Not Applicable to the listed entity during the Review Period);**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to the listed entity during the Review Period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period);**

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# SUNIL KUMAR SHARMA & ASSOCIATES

**Sunil Kumar Sharma**

**(Practicing Company Secretaries)**

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

**Email: cssunsharma7@gmail.com**

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- f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the listed entity during the Review Period);**
- g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) Other Regulation/s [as applicable]
- a) Securities and Exchange Board of India (Depositories and Participants) Regulations 2018;
- b) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- c) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021 **(Not Applicable to the listed entity during the Review Period);**

and Circular/s or Guideline/s issued thereunder, which includes: – Securities and Exchange Board of India [SEBI] Circular No.CIR/CFD/CMD1/114/2019 Dated 18 October 2019 –Para 6(A) and 6(B) regarding Appointment or Resignation of Statutory Auditors of the Listed Entity – **Not Applicable to the Listed Entity for the Review Period.**

and based on the above examination, we hereby report that, during the Review Period:

1. The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of matters specified below: - Not Applicable.

Compliance Requirements (Regulations/circulars/guidelines including specific clause)	<b>NOT APPLICABLE</b>
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	

2. The listed entity has taken the following actions to comply with the observations made in previous reports

Compliance Requirements (Regulations/circulars/guidelines including specific clause)	The Listed Company has been submitted Financial Results for the Year/period ended 31 <sup>st</sup> March, 2023 on 29/05/2023 i.e. date of Board Meeting, However, the
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**SUNIL KUMAR SHARMA & ASSOCIATES****Sunil Kumar Sharma****(Practicing Company Secretaries)****Phone No:-+91-7709885236,+91-9309702402****Email:cssunsharma7@gmail.com****Off Add-2<sup>nd</sup> Floor Samarth Building Sona Restaurant Square C.A. Road Gandhibagh Nagpur-02MH**

	Company has not submitted the Related Party Transaction in XBRL Mode for the Year/period ended 31 <sup>st</sup> March, 2023.
Regulation/ Circular No.	Regulation 23 (9) Listing Obligations and Disclosure Requirements) Regulations, 2015.
Deviations	Delay in furnishing the Related Party Transaction for the period half year ended 31 <sup>st</sup> March, 2023 on the date of publication of financial results.
Action Taken by	BSE Limited ("BSE")
Type of Action	Fine
Details of Violation	BSE Limited (BSE), vide Notice through e-Mail Communication, Ref. No. SOP-Review- June 2023 of Friday, the 30 <sup>th</sup> June 2023, referring to SEBI SOP Circular No. SEBI/HO/CFD/CMD/CIR/P/2020/12 Dated 22 January 2020 ('SEBI SOP Circular'), with respect to penal actions prescribed for non-compliance of certain provisions of the SEBI (LODR) Regulations, 2015 and Standard Operating Procedure to initiate action related to freezing of the entire shareholding of the promoter in this entity as well as all other securities held in the demat account of the promoter, has observed that the Listed Entity is a Noncompliant / Late-compliant in respect of Regulation 23(9) of the SEBI (LODR) Regulations, 2015 – Delay in disclosure of related party transactions on consolidated basis.
Fine Amount	Fine of 15,000/- (Fifteen Thousand) Plus GST @18%, 2,700/- (Two Thousand Seven Hundred), Total Fine Payable is 17,700/- (Seventeen Thousand Seven Hundred).
Observations/Remarks of the Practicing Company Secretary	The Company has filed the Disclosure of Related Party Transactions in XBRL mode on 01 <sup>st</sup> June, 2023. There was a delay of three days in filing the disclosure. Further, on 15 <sup>th</sup> July, 2023 The Company has made payment of fine amounting Rs. 17,700/-.
Management Response	The Listed Entity and its Management had acknowledged the Notice through e-Mail Communication, Ref. No. SOP-Review- June 2023 of Friday, the 30 <sup>th</sup> June 2023 and remitted a Total Fine Payable 17,700/- (Seventeen Thousand Seven Hundred) [Fine of 15,000/- (Fifteen Thousand) Plus GST @18%, 2,700/- (Two Thousand Seven Hundred)] vide RTGS UTR No. NGSBQ23196681657 Dated 15 <sup>th</sup> July 2023. The said compliance information has been duly intimated to BSE Limited through e-mail Dated 15 <sup>th</sup> July, 2023.

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Remarks

No Specific Observation/s or Remark/s.

I hereby report that, during the Review Period, the compliance status of the Listed Entity with the following requirements: –

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<b><u>Secretarial Standards:</u></b>  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.	<b><u>Adoption and timely updation of the Policies:</u></b>  a. All applicable policies under SEBI Regulations are adopted with the approval of board of directors of Listed Entity.  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.	<b><u>Maintenance and disclosures on Website:</u></b>  a. The Listed Entity 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 27 (2) are accurate and specific which redirects to the relevant document(s)/ section of the website.	Yes	--
4.	<b><u>Disqualification of Director:</u></b>  None of the Director(s) of the Company are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	--
5.	<b><u>Details related to Subsidiaries of listed entities have been examined with respect to:</u></b> (a) Identification of material subsidiary companies  (b) Disclosure requirement of material as well as other subsidiaries	N.A.	During the Review Period, The Listed Entity do not have any Material Subsidiary.

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6.	<b><u>Preservation of Documents:</u></b>  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.	<b><u>Performance Evaluation:</u></b>  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.	<b><u>Related Party Transactions:</u></b> (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions;	Yes	--
	(b) In case, no prior approval obtained, the Listed Entity shall provide detailed reason/s along with confirmation whether the transaction/s were subsequently approved, ratified or rejected by the Audit committee	N.A.	There were no such transactions during the review period
9.	<b><u>Disclosure of events or information:</u></b>  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.	<b><u>Prohibition of Insider Trading:</u></b>  The Company is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	--
11.	<b><u>Actions taken by SEBI or Stock Exchange, if any:</u></b>  No Action/s taken against the Listed Entity, It's Promoters, Director/s or Subsidiaries either by the SEBI or by Stock Exchange [including under the Standard Operating Procedures issued by SEBI through various Circular/s] under SEBI Regulations and Circular/s or Guideline/s issued thereunder	Yes	No action were taken by SEBI or Stock Exchanges during the review period
12.	<b><u>Resignation of Statutory Auditors from the Listed Entity or its Material Subsidiaries</u></b>  In case of resignation of Statutory Auditors from the Listed Entity or any of its Material Subsidiaries during the financial year, the Listed Entity and/or its Material Subsidiary(ies) has / have complied with Paragraph 6.1 and 6.2 of Section V-D of	NA	There were no such transactions during the





# SUNIL KUMAR SHARMA & ASSOCIATES

**Sunil Kumar Sharma**

**(Practicing Company Secretaries)**

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	Chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by Listed Entities		review period
13.	<b><u>Additional Non-compliances, if any:</u></b>  No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	NA	There were no such transactions during the review period

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Sunil Kumar Sharma & Associates  
Company Secretaries

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Sunil Kumar Sharma  
FCS: 10043 C.P. No. 12708  
UDIN: F010043G000367433  
P.R.No.: 2547/2022  
Place: Nagpur  
Date: 17/05/2025