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Rajkot-360005, Gujarat, INDIA. Ph. +91 281 2581152

Fact : Survey No. 54 P, N.H. 8 B, Nr. Pan Agri Exports At. Bhunava, Ta. Gondal,
Dist. Rajkot - 360311, Gujarat (INDIA) Ph.: +91 2825 280634 / 35 | Fax. +91 7878036500
E-mail: shree_ramcolton@yahoo.com, info@shreeramproteins.com
web: www.shreeramproteins.com

Corporate Identity Number (CIN)
L01405GJ2008PLC054913



Date: May 30, 2023

To,
Listing Compliance Department
National Stock Exchange of India Limited
Exchange Plaza,
BandraKurla Complex,
Bandra (East), Mumbai – 400051

Subject: Secretarial Compliance Report of the Company for the year ended March 31, 2023.

Ref: Shree Ram Proteins Limited (Symbol: SRPL, ISIN: INE008Z01020)

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations & Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed herewith Secretarial Compliance Report issued by M/s. Payal Dhamecha & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2023.

Please take on your record and oblige us.

Thanking You,

Yours faithfully,

For, Shree Ram Proteins Limited

Lalitkumar Chandulal Vasoya
Chairman and Managing Director
DIN: 02296254

Encl :- A/a

**SECRETARIAL COMPLIANCE REPORT OF
SHREE RAM PROTEINS LIMITED
For the Financial Year ended on March 31, 2023**

To,
The Board of Directors,
Shree Ram Proteins Limited
CIN: - L01405GJ2008PLC054913
Imperial Heights Tower-B, Second Floor,
Office No. B-206, 150 Ft Ring Road,
Opp. Big Bazar, Rajkot 360005, Gujarat

Dear Sir/Madam,

SECRETARIAL COMPLIANCE REPORT FOR THE YEAR ENDED MARCH 31, 2023

We have been engaged by **Shree Ram Proteins Limited** (hereinafter referred to as 'the Company' bearing CIN: L01405GJ2008PLC054913 whose Equity Shares are Listed on National Stock Exchange of India Limited to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No CIR/CFD/CMD/1/27/2019 dated 8th February, 2019, and NSE Circular Ref. No: NSE/CML/2023/30 dated April 10, 2023, to issue the Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/guidelines issued thereunder. Our responsibility is to verify compliance by the Company with the provisions of all applicable SEBI Regulations and Circulars/Guidelines issued from time to time and issue a report thereon.

Our Audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Secretarial Compliance Report is enclosed herewith.

For, Payal Dhamecha & Associates
Practicing Company Secretary
Firm Registration Number: S2020GJ735800
Peer Review Number: 2115/2022





Payal Dhamecha
Proprietor
M. No.: 47303, COP: 20411
UDIN: - A047303E000425197

Date: - May 30, 2023
Place: - Ahmedabad

SECRETARIAL COMPLIANCE REPORT OF SHREE RAM PROTEINS LIMITED
(CIN: L01405GJ2008PLC054913)

For the Financial Year ended on March 31, 2023
[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We, have examined:

- All the documents and records made available to us and explanation provided by Shree Ram Proteins Limited ("the Company" or "the listed entity" or "SRPL"),
- the filings/ submissions made by the listed entity to the stock exchange,
- website of the listed entity and
- any other document/ filing, as may be relevant, which has been relied upon to make this certification.

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

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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;

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 (to the extent applicable);

And circulars/ guidelines/Amendments issued thereunder, and based on the above examination and explanation/clarification given by the Company and its officers/KMP's and pursuant to NSE Circular Ref. No: NSE/CML/2023/30 dated April 10, 2023 following is the additional affirmation:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS
1.	Secretarial Standard: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable	Yes	-
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. 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 Yes	- -
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> The Listed entity is maintaining a functional website Timely dissemination of the documents/ information under a separate section on the website 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 Yes Yes	- - -
4.	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	-
5.	To examine details related to Subsidiaries of listed entities: <ol style="list-style-type: none"> Identification of material subsidiary companies Requirements with respect to disclosure of material as well as other subsidiaries 	NA NA	The Company does not have any material subsidiary Companies hence requirement with respect to disclosure of material as well as other subsidiaries is not applicable during the year under review.
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 as prescribed in SEBI Regulations	Yes	As per SEBI LODR and Companies Act, the Board Evaluation is required to be done once in a year. Formal process of Performance Evaluation was carried out in the Month of March 2023 for FY 22-23.
8.	Related Party Transactions <ol style="list-style-type: none"> The listed entity has obtained prior approval of Audit Committee for all Related party transactions In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee 	Yes NA	Since, all Related party transactions were entered after obtaining prior approval of audit committee point (b) is not applicable
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 listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	Company has maintained internally structured digital database in Digital Software for FY 2022-23 with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. <i>However, majority of UPSI Sharing Entries have been entered delayed in the software.</i>
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ 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	National Stock Exchange of India Limited has vide its Letter dated August 01, 2022 fined Company for delayed compliance of Regulation 23(9) of SEBI LODR Regulations 2015. Fine amounting to Rs. 32,400 (Inclusive of Taxes) was imposed for delay of 6 days in Filing of Related Party Transactions. Company paid penalty to exchange on August 04, 2022.
12.	Additional Non-compliances, if any Any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	Yes	Mentioned as Below

We hereby report that, during the review period;

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder to the extent applicable and in the manner prescribed, except in respect of matters specified below;

306, Yash Aqua, Vijay Cross Road, Navrangpura, Ahmedabad – 380009
M: +91 – 8238328985, Email: cspayald1314@gmail.com

The professional firm where Corporate Governance & Customer Satisfaction Matters.

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																																																																								
1.	Schedule B of Securities and Exchange Board of India Prohibition of Insider Trading (PIT) Regulations, 2015	Clause 10 of Schedule B of SEBI (Prohibition Of Insider Trading) Regulations, 2015)	Promoters and Member of Promoter group had entered into Contra Trade for a period less than 6 months			<p>Details of Contra Trade executed by Promoters and member of Promoter Group, Trade for a period less than 6 months:-</p> <p>1. Mr. Lalitbhai Vasoya (PAN:- ADKPV6510F)</p> <table border="1"> <thead> <tr> <th>Date of Transaction</th> <th>Buy/Sell</th> <th>No of Shares</th> <th>Average Price per Share</th> </tr> </thead> <tbody> <tr> <td>22-11-2022</td> <td>Buy</td> <td>150000</td> <td>80.07</td> </tr> <tr> <td>26-11-22 to 28-11-2022</td> <td>Sell</td> <td>800000</td> <td>80.62</td> </tr> <tr> <td>30-11-2022 to 2-12-2022</td> <td>Buy</td> <td>50000</td> <td>77.50</td> </tr> <tr> <td>16-12-2022</td> <td>Sell</td> <td>300000</td> <td>82.20</td> </tr> <tr> <td>20-12-2022</td> <td>Buy</td> <td>12587</td> <td>74.45</td> </tr> <tr> <td>28-12-2022 to 30-12-2022</td> <td>Sell</td> <td>30415</td> <td>64.32</td> </tr> </tbody> </table> <p>2. Mrs. Geetaben Vasoya (PAN: AHSPV6469R)</p> <table border="1"> <thead> <tr> <th>Date of Transaction</th> <th>Buy/Sell</th> <th>No of Shares</th> <th>Average Price per Share</th> </tr> </thead> <tbody> <tr> <td>07-06-2022 to 08-06-2022</td> <td>Sell</td> <td>2000</td> <td>90.7</td> </tr> <tr> <td>23-11-2022 to 25-11-2022</td> <td>Buy</td> <td>374000</td> <td>80.10</td> </tr> <tr> <td>05-12-2022</td> <td>Sell</td> <td>60000</td> <td>79.80</td> </tr> <tr> <td>15-02-2023</td> <td>Buy</td> <td>45693</td> <td>58.00</td> </tr> </tbody> </table> <p>3. Mr. Piyush Vasoya (PAN: AHRPV2999P)</p> <table border="1"> <thead> <tr> <th>Date of Transaction</th> <th>Buy/Sell</th> <th>No of Shares</th> <th>Average Price per Share</th> </tr> </thead> <tbody> <tr> <td>23-11-2022 to 25-11-2022</td> <td>Sell</td> <td>245501</td> <td>80.31</td> </tr> <tr> <td>28-11-2022</td> <td>Buy</td> <td>500000</td> <td>80.70</td> </tr> <tr> <td>30-11-2022 to 02-12-2022</td> <td>Sell</td> <td>15077</td> <td>77.71</td> </tr> <tr> <td>16-12-2022</td> <td>Buy</td> <td>300000</td> <td>82.20</td> </tr> <tr> <td>16-12-2022 to 19-12-2022</td> <td>Sell</td> <td>60000</td> <td>79.47</td> </tr> </tbody> </table>	Date of Transaction	Buy/Sell	No of Shares	Average Price per Share	22-11-2022	Buy	150000	80.07	26-11-22 to 28-11-2022	Sell	800000	80.62	30-11-2022 to 2-12-2022	Buy	50000	77.50	16-12-2022	Sell	300000	82.20	20-12-2022	Buy	12587	74.45	28-12-2022 to 30-12-2022	Sell	30415	64.32	Date of Transaction	Buy/Sell	No of Shares	Average Price per Share	07-06-2022 to 08-06-2022	Sell	2000	90.7	23-11-2022 to 25-11-2022	Buy	374000	80.10	05-12-2022	Sell	60000	79.80	15-02-2023	Buy	45693	58.00	Date of Transaction	Buy/Sell	No of Shares	Average Price per Share	23-11-2022 to 25-11-2022	Sell	245501	80.31	28-11-2022	Buy	500000	80.70	30-11-2022 to 02-12-2022	Sell	15077	77.71	16-12-2022	Buy	300000	82.20	16-12-2022 to 19-12-2022	Sell	60000	79.47		Transactions of Promoter and Promoter Group as mentioned in Column - detail of Violation, tantamount to Contra Trade as per SEBI PIT Regulations, 2015.	Company has uploaded PIT Code on its website and also circulated to its Designated persons. Company will arrange sessions to update All the designated Persons with the provisions of PIT Regulations, 2015.	
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2.	Delay in submission of disclosure of trades executed by promoter & promoters group under Regulation 29(2) of Securities and Exchange Board of India Substantial Acquisition of Shares and Takeovers Regulations, 2011. (SEBI SAST Regulations)	Regulation 29(2) of SEBI SAST Regulations.	Delay in submission of disclosure by promoter and Promoter Group to Company and Exchange.			<table border="1"> <thead> <tr> <th>Name of Promoter/ Promoter Group.</th> <th>Date of Transaction</th> <th>No of Shares And BUY/ (SELL)</th> <th>Date of Disclosure</th> <th>Delay in days.</th> </tr> </thead> <tbody> <tr> <td>Lavjibhai Savaliya</td> <td>17-08-2022</td> <td>37546 - Sell</td> <td>22-08-2022</td> <td>1 Day</td> </tr> <tr> <td>Lavjibhai Savaliya</td> <td>02-11-2022</td> <td>25000 - Sell</td> <td>08-11-2022</td> <td>2 Days</td> </tr> <tr> <td>Lavjibhai Savaliya</td> <td>6-12-2022 & 7-12-2022</td> <td>161332 - Sell</td> <td>12-12-2022</td> <td>1 Day</td> </tr> <tr> <td>Lalitbhai Vasoya</td> <td>14-12-2022</td> <td>77000 - Buy</td> <td>19-12-2022</td> <td>1 Day</td> </tr> <tr> <td>Lalitbhai Vasoya</td> <td>20-12-2022</td> <td>12587 - Buy</td> <td>26-12-2022</td> <td>2 Days</td> </tr> <tr> <td>Piyush Vasoya</td> <td>14-12-2022</td> <td>50000 - Sell</td> <td>19-12-2022</td> <td>1 Day</td> </tr> <tr> <td>Piyush Vasoya</td> <td>05-12-2022</td> <td>91515 - Sell</td> <td>09-12-2022</td> <td>1 Day</td> </tr> <tr> <td>Geetaben Vasoya</td> <td>05-12-2022</td> <td>60000 - Sell</td> <td>09-12-2022</td> <td>1 Day</td> </tr> </tbody> </table>	Name of Promoter/ Promoter Group.	Date of Transaction	No of Shares And BUY/ (SELL)	Date of Disclosure	Delay in days.	Lavjibhai Savaliya	17-08-2022	37546 - Sell	22-08-2022	1 Day	Lavjibhai Savaliya	02-11-2022	25000 - Sell	08-11-2022	2 Days	Lavjibhai Savaliya	6-12-2022 & 7-12-2022	161332 - Sell	12-12-2022	1 Day	Lalitbhai Vasoya	14-12-2022	77000 - Buy	19-12-2022	1 Day	Lalitbhai Vasoya	20-12-2022	12587 - Buy	26-12-2022	2 Days	Piyush Vasoya	14-12-2022	50000 - Sell	19-12-2022	1 Day	Piyush Vasoya	05-12-2022	91515 - Sell	09-12-2022	1 Day	Geetaben Vasoya	05-12-2022	60000 - Sell	09-12-2022	1 Day		Delay in submission of disclosure by promoter and Promoter Group to Company and Exchange.	Promoter and Promoter Group will ensure that all disclosures are reported on time to company and Stock exchange																												
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3.	Regulation 23(9) of SEBI (LODR) Regulations, 2015 w.r.t Related party transactions.	Regulation 23(9) of SEBI (LODR) Regulations, 2015 as amended	As per the amended provisions of regulation 23(9) of SEBI (LODR) Regulations, 2015, the company was required to file the Related party transactions with the Stock Exchange (NSE) for Half Year ended on March 31, 2022 within 15 days from the date of publication of its standalone financial results. However, the company filed Related party transactions for half year ended on March 31, 2022 on May 16, 2022, resulting in delay of 6 days.	NSE Limited	SOP Fine		Rs. 32,400 (Inclusive of Taxes)	Company Received SOP fine letter dated August 01, 2022 by National Stock Exchange of India due to delay filing in Related party disclosure under Regulation 23 (9) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, for the half year ended on March 31, 2022.	The Management will now devise proper system for timely filing of compliances to stock exchange to avoid such penalties.
4.	Prohibition of Insider Trading Regulations, 2015.	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Delay by Company in entering majority of UPSI Sharing Entries in software (Structured Digital Database)					Company has maintained internally Structured Digital Database in Digital Software for FY 2022-23 with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. <i>However there is a Delay by Company in entering of majority of UPSI Sharing Entries in software.</i>	Management of Company will be more alert in making entries of UPSI Sharing into software the same day on which UPSI is shared to any Designated Persons. Delay was unintentional, to make all compliance within due date, UPSI sharing entries into software got delayed.
5.	Schedule III- Part A Sub Clause 16 of SEBI LODR Regulations, 2015.	Schedule III- Part A Sub Clause 16 of SEBI LODR Regulations, 2015.	(a) Company has not intimated exchange on Filing of application by financial creditor for initiation of CIRP against the Company. (b) Delay in intimation of 1 day for Admission of Company in CIRP under Section 9 of IBC, 2019.	National Company Law Tribunal (NCLT)	NCLT admitted company into CIRP Proceeding for a claim of operational creditor, M/s, Mohini Health & Hygiene Limited amounting to Rs. 4,82,95,171/- (Including Rs. 1,21,82,419 as Invoice amount and Rs.3,61,12,752/- towards Interest amount @ 18% as per invoicing structure)			Company was admitted in CIRP under Section 9 of IBC, 2019 as per NCLT order dated January 11, 2023. Company intimated the exchange on January 13, 2023. Therefore there is a delay of 1 day. Further Company did not intimated the exchange for Filing of application by financial creditor for initiation of CIRP against the Company.	Company was expecting Stay Order on the CIRP Proceeding initiated by NCLT as there was a counter claim of Individual Promoter against M/s. Mohini Health & Hygiene Limited. Stay order was pronounced on January 25, 2023 and intimated the exchange on the same day.

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

Sr. No.*	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause) *	Regulation/Circular No. *	Deviations*	Action Taken by*	Type of Action*	Fine Amount*	Observations/ Remarks of the Practicing Company Secretary*	Management Response*	Remarks*
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1	Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulation)- Closure of Trading Window	Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulation)-	Promoter and Person's falling under Promoter Group of Company traded in shares of Company during the closure of Trading Window		<p>Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and Company's Code of Internal Procedures and Conduct for Prevention of Insider Trading in Securities, Company's Trading Window for dealing in securities of the Company remained closed with effect from October 1, 2021 till 48 hours after the announcement of the financial results of the Company for the quarter ended September 30, 2021 and with effect from January 1, 2022 till 48 hours after the announcement of the financial results of the Company for the quarter ended December 31, 2021. Company Secretary uploaded Intimation to Stock Exchange on September 30, 2021 and December 31, 2021 respectively.</p> <p>Promoter and Person falling under Promoters Group traded in Shares of Company during span of Trading Window Closure for Insiders of Company:-</p> <table border="1" data-bbox="710 526 1236 694"> <thead> <tr> <th>Name of Person</th> <th>Category</th> <th>Date of Transaction</th> <th>No. of Shares sold</th> </tr> </thead> <tbody> <tr> <td>Geetaben Lalitbhai Vasoya (PAN:- AHSPV6469R)</td> <td>Promoter Group</td> <td>October 21, 2021</td> <td>(10)</td> </tr> <tr> <td></td> <td></td> <td>January 4, 2022</td> <td>(25,000)</td> </tr> <tr> <td>Lalitbhai Vasoya (PAN:- ADKPV6510F)</td> <td>Promoter</td> <td>January 10, 2022</td> <td>(50,000)</td> </tr> </tbody> </table>	Name of Person	Category	Date of Transaction	No. of Shares sold	Geetaben Lalitbhai Vasoya (PAN:- AHSPV6469R)	Promoter Group	October 21, 2021	(10)			January 4, 2022	(25,000)	Lalitbhai Vasoya (PAN:- ADKPV6510F)	Promoter	January 10, 2022	(50,000)	<p>Company has uploaded PIT Code on its website and also circulated to its Designated persons.</p> <p>Company will arrange sessions to update All the designated Persons of all the provisions of PIT Regulations, 2015.</p> <p>Promoter and Promoter Group will ensure that all disclosures are reported on time to company and Stock exchange.</p>																			
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2.	Contra Trade as per code of internal procedures and conduct for prevention of insider trading in securities as per Regulation 10 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.	Schedule B of Regulation 10 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.	Promoter had entered into Contra Trade within a period of 6 months		<p>Details of Contra Trade executed by Promoter, Mr. Lalitbhai Vasoya (PAN:- AHSPV6469R) within a period of 6 months:-</p> <table border="1" data-bbox="710 1019 1212 1153"> <thead> <tr> <th>Date of Transaction</th> <th>Buy/Sell</th> <th>No of Shares</th> <th>Average Price per Share</th> </tr> </thead> <tbody> <tr> <td>January 10, 2022</td> <td>Sell</td> <td>50000</td> <td>46</td> </tr> <tr> <td>January 28, 2022</td> <td>Buy</td> <td>58000</td> <td>48.40</td> </tr> <tr> <td>March 30, 2022</td> <td>Sell</td> <td>17000</td> <td>131.00</td> </tr> <tr> <td>March 31, 2022</td> <td>Sell</td> <td>11526</td> <td>131.50</td> </tr> </tbody> </table>	Date of Transaction	Buy/Sell	No of Shares	Average Price per Share	January 10, 2022	Sell	50000	46	January 28, 2022	Buy	58000	48.40	March 30, 2022	Sell	17000	131.00	March 31, 2022	Sell	11526	131.50	<p>Company has uploaded PIT Code on its website and also circulated to its Designated persons.</p> <p>Company will arrange sessions to update All the designated Persons of all the provisions of PIT Regulations, 2015.</p> <p>Promoter and Promoter Group will ensure that all disclosures are reported on time to company and Stock exchange.</p>															
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3.	Regulation 7(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT)	Regulation 7(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT)	Promoters had not given Disclosures within 2 trading days of transaction or a series of transaction in a calendar quarter aggregating to a traded value of Rupees Ten Lakh Rupees under Regulation 7(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.		<p>Following Promoter and Person falling under Promoter group had not disclosed within 2 trading days of transaction or a series of transaction in a calendar quarter aggregating to a traded value of Rupees Ten Lakh Rupees under Regulation 7(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:-</p> <table border="1" data-bbox="710 1512 1340 1780"> <thead> <tr> <th>Date of Transaction</th> <th>Due date of Disclosure</th> <th>Date of Intimation to Company</th> <th>Date of Intimation by Company</th> <th>Name of Person</th> <th>Category</th> <th>No of Shares Buy/ (Sold)</th> </tr> </thead> <tbody> <tr> <td>December 24, 2021</td> <td>December 28, 2022</td> <td>January 20, 2022</td> <td>January 24, 2022</td> <td>Geetaben Lalitbhai Vasoya</td> <td>Promoter Group</td> <td>(25000)</td> </tr> <tr> <td>January 4, 2022</td> <td>January 06, 2022</td> <td>January 20, 2022</td> <td>January 20, 2022</td> <td>Geetaben Lalitbhai Vasoya</td> <td>Promoter Group</td> <td>(25000)</td> </tr> <tr> <td>January 10, 2022</td> <td>January 12, 2022</td> <td>January 20, 2022</td> <td>January 24, 2022</td> <td>Lalitbhai Vasoya</td> <td>Promoter</td> <td>(50000)</td> </tr> <tr> <td>January 28, 2022</td> <td>February 01, 2022</td> <td>April 6, 2022</td> <td>April 6, 2022</td> <td>Lalitbhai Vasoya</td> <td>Promoter</td> <td>58000</td> </tr> </tbody> </table>	Date of Transaction	Due date of Disclosure	Date of Intimation to Company	Date of Intimation by Company	Name of Person	Category	No of Shares Buy/ (Sold)	December 24, 2021	December 28, 2022	January 20, 2022	January 24, 2022	Geetaben Lalitbhai Vasoya	Promoter Group	(25000)	January 4, 2022	January 06, 2022	January 20, 2022	January 20, 2022	Geetaben Lalitbhai Vasoya	Promoter Group	(25000)	January 10, 2022	January 12, 2022	January 20, 2022	January 24, 2022	Lalitbhai Vasoya	Promoter	(50000)	January 28, 2022	February 01, 2022	April 6, 2022	April 6, 2022	Lalitbhai Vasoya	Promoter	58000	<p>Company has uploaded PIT Code on its website and also circulated to its Designated persons.</p> <p>Company will arrange sessions to update All the designated Persons of all the provisions of PIT Regulations, 2015.</p> <p>Promoter and Promoter Group will ensure that all disclosures are reported on time to company and Stock exchange.</p>
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4.	Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 - Disclosure of encumbered shares	Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Promoter of Company had not disclosed details of shares of company encumbered by him within seven working days from creation of encumbrance under Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011		<p>Detail of Delayed Disclosure by Mr. Lalitbhai Vasoya (PAN:- ADKPV6510F) under Regulation 31(1) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 for encumbrance on his shares of Company:-</p> <table border="1" data-bbox="703 376 1187 488"> <thead> <tr> <th>Date of Creation of Encumbrance</th> <th>Due Date of Disclosures</th> <th>No of Shares Encumbered</th> <th>Date of Disclosure to Company</th> <th>Date of Disclosure by Company</th> </tr> </thead> <tbody> <tr> <td>January 27, 2022</td> <td>February 07 2022</td> <td>600000</td> <td>April 11, 2022</td> <td>April 11, 2022</td> </tr> </tbody> </table>	Date of Creation of Encumbrance	Due Date of Disclosures	No of Shares Encumbered	Date of Disclosure to Company	Date of Disclosure by Company	January 27, 2022	February 07 2022	600000	April 11, 2022	April 11, 2022	Promoter and Promoter Group will ensure that all disclosures are reported on time to company and Stock exchange.
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We further report that, during the review period, following regulations issued by the Securities and Exchange Board of India were not applicable to the Company, since there were no such instances occurred during the review period that requires the compliance under the said regulations;

- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 and amendment thereof;;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;
- The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries";

For, Payal Dhamecha & Associates
Practicing Company Secretary
Firm Registration Number: S2020GJ735800
Peer Review Number: 2115/2022





Payal Dhamecha
Proprietor
M. No.: 47303, COP: 20411
UDIN: - A047303E000425197

Date: - May 30, 2023
Place: - Ahmedabad