

SARTHAK INDUSTRIES LIMITED

CIN: L99999MH1982PLC136834

Regd. Office: ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (Maharashtra)
400009, Phone: 022 23486740, Email: sarthakindustries@yahoo.in, website: www.sarthakindustries.com

07th May, 2022

To,

The BSE Limited
25th Floor, Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400 001

Dear Sir/ Madam,

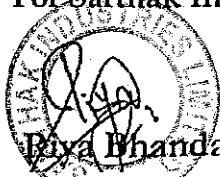
Sub: Annual Secretarial Compliance Report for the Financial Year Ended 31st March, 2022
under Regulation 24A of SEBI (LODR) Regulations, 2015.

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08th February, 2019; please find attached herewith the "Annual Secretarial Compliance Report" for the Financial Year ended 31st March, 2022 issued by Ajit Jain & Co., Company Secretaries, Indore.

You are requested to take the same on your records and oblige.

Thanking you,

Yours sincerely,
For Sarthak Industries Limited



Priya Bhandari
Company Secretary

**SECRETARIAL COMPLIANCE REPORT OF SARTHAK INDUSTRIES
LIMITED for the year ended 31.03.2022**

We **AJIT JAIN & CO., PRACTICING COMPANY SECRETARY** have examined:

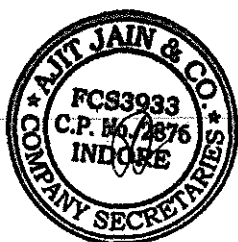
- (a) all the documents and records made available to us and explanation provided by **SARTHAK INDUSTRIES LIMITED (CIN: L99999MH1982PLC136834)** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31ST MARCH, 2022 ("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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 DURING REVIEW PERIOD)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (NOT APPLICABLE DURING REVIEW PERIOD)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (NOT APPLICABLE DURING REVIEW PERIOD)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (NOT APPLICABLE DURING REVIEW PERIOD)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993. as applicable and circulars/ guidelines



issued thereunder; and based on the above examination. We hereby report that, during the Review Period:

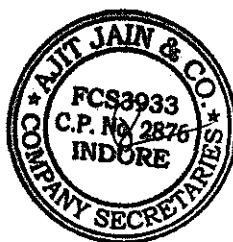
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Intimation regarding violation of Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015	One of the Promoters of the Company sold the shares while trading window was closed.	Company intimated to Stock Exchanges for violation.

- (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 our examination of those records.
- (c) There were no actions 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:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial compliance Report for the year ended....--	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable-- No observations were made in previous report for the year ended 31 st March, 2021				

Place: Indore
Date: 04/05/2022



For Ajit Jain & Co.,
Company Secretaries

A. K. Jain

CS Ajit Jain
Proprietor
FCS No.: 3933
C. P. No.: 2876

UDIN: F003933D000268549

Peer Review Certificate No. 767/2020
PCS Unique ID No.: S1998MP023400