



**SIR SHADILAL ENTERPRISES LIMITED**

A **Triveni** Company

To,  
The Department of Corporate Affairs  
The BSE Limited  
25Th Floor P J Towers,  
Dalal Street, Mumbai -400001, India

Date: 30.05.2025

Sir Shadi Lal Enterprises Limited – Scrip Code- 532879

Subject: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2025

Ref: Regulation 24A of SEBI (LODR) Regulations 2015

Respected Sir,

In terms of Regulation 24A of SEBI (LODR) Regulations, 2015, we enclose herewith Annual Secretarial Compliance Report of the Company for the financial year ended 31<sup>st</sup> March, 2025 issued by M/s Rahul Saini & Co. , Company Secretaries, Secretarial Auditor of the Company.

This is for your information and records.

Thanking You,

Yours Faithfully

For Sir Shadi Lal Enterprises Limited

(Ajay Kumar Jain)  
Company Secretary  
FCS 5826

# Rahul Saini & Co COMPANY SECRETARIES

II Floor, Maharaja Arcade, Near Nandan Cinema  
Garh Road, Meerut Uttar Pradesh 250002

Email: rahulsainiandcompany@gmail.com



राहुल सैनी एण्ड कम्पनी  
कम्पनी सैक्रेटरीस

द्वितीय तल, महाराजा आर्केड, निकट नन्दन सिनेमा  
गढ़ रोड, मेरठ उत्तर प्रदेश २५०००२

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## SECRETARIAL COMPLIANCE REPORT of

**Sir Shadi Lal Enterprises Limited**  
**(For the year ended 31<sup>st</sup> March, 2025)**

We, Rahul Saini & Co., have examined:

- (a) all the documents and records made available to us and explanation provided by **SIR SHADI LAL ENTERPRISES 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 certification,

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 thereunder by the Securities and Exchange Board of India ("SEBI").

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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;
- \*(e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;





\*(f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021;

(f) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

\*No event took place under these Regulations during the Review Period.

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)	Regulation / Circular No.	Deviations	Action taken by	Type of Action	Detailsof Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Management Response	Remarks
BSE Limited raised a query for non-compliance with the requirements pertaining to appointment of a non-executive director who has attained the age of seventy-five years as per Regulation 17(1A) during the quarter ended June 30, 2024 and imposed a fine of Rs.22,000/- plus GST. In response, the Company replied that it has duly complied with the relevant provisions of the SEBI LODR Regulations relying on the case laws of Hon'ble Securities Appellate Tribunal in the matter of "20 Microns Limited v. BSE Limited and Ors." (Appeal No. 846 of 2023) and "Nectar Life Sciences Ltd. v. SEBI" (Appeal No. 185 of 2023), and obtained consent of the shareholders within the prescribed time of three months of the appointment of director in question in terms of Reg. 17(1A) read with Reg.17(1C) of SEBI LODR Regulations. However, in spite of due compliance, the Company paid the fine under protest. Since the Company has paid the requisite fine with BSE, we have no comment on the same.										

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

Sr.No	Observations/Remarks of the Practicing Company secretary in the previous reports (1)	Observations made in secretarial compliance report for the year ended March 31, 2024. (2)	Compliance Requirement (Regulations / circulars/ guidelines including specific clause) (3)
Not Applicable			

Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity (4)	Remedial actions, if any, taken by the listed entity (5)	Comments of the PCS in the actions taken by the listed entity (6)
Not Applicable		





(c) We hereby further report that during the Review Period the compliance status of the listed entity with the following requirements:

Sl. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<b>Secretarial Standard</b> 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	None
2.	<b>Adoption and timely updation of the Policies:</b> <ul style="list-style-type: none"> <li>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the Company</li> <li>All the policies are in conformity with SEBI Regulations and have been reviewed &amp; updated on time, as per the regulations/ circulars/ guidelines issued by SEBI.</li> </ul>	Yes  Yes	None  None
3.	<b>Maintenance and disclosures on Website:</b> <ul style="list-style-type: none"> <li>The Company is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>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</li> </ul>	Yes  Yes  Yes	None
4.	<b>Disqualification of Director:</b> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None
5.	<b>Details related to Subsidiaries of listed entities have been examined w.r.t.:</b> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	Not Applicable	The Company do not have any subsidiary





6.	<b>Preservation of Documents:</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	None
7.	<b>Performance Evaluation:</b> The Company 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	None
8.	<b>Related Party Transactions:</b> (a) The Company has obtained prior approval of Audit Committee for all Related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes	None
9.	<b>Disclosure of events or information:</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	None
10.	<b>Prohibition of Insider Trading:</b> The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	None
11.	<b>Actions taken by SEBI or Stock Exchange(s), if any:</b> No action(s) has been 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	No	BSE Limited had levied a fine of Rs.22,000/- plus GST on the Company in terms of SEBI SOP Circular dated July 11, 2023 for not obtaining prior approval of shareholders in terms of Regulation 17(1A) of SEBI LODR Regulations for appointment of a non-executive director who has attained the age of 75 years during the quarter ended June 30, 2024. The Company has paid the requisite fine with BSE under protest.





12.	<b>Resignation of statutory auditors from the listed entity or its material subsidiaries:</b> In case of resignation of statutory auditor 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 chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	The Company do not have any subsidiary
13.	<b>No Additional Non-compliances observed:</b> No additional non-compliance observed for any of the SEBI regulation / circular / guidance note etc.	Yes	None

#### 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 Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) 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.

Date: 30.05.2025

Place: Meerut

UDIN: A016716G000502685



For Rahul Saini & Co.

*Rahul Saini*

(CS RAHUL SAINI)

Prop.  
entity. ICSI Membership No. ACS 16716  
C.P No. 7009  
Peer Review Cert. No. 4994/2023

Rahul Saini & Co.

(CS RAHUL SAINI)

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