

**SHARP INDIA LIMITED**

Registered Office & Factory  
Gat no. 686/4, Koregaon Bhima, Tal. Shirur,  
Dist.: Pune : Pin : 412 216  
Phones : (02137) 252417 / 252418  
Fax : (02137) 252453  
Website : [www.sharpindialimited.com](http://www.sharpindialimited.com)  
CIN : L36759MH1985PLC036759

To,

25.05.2022

**Corporate Relationship Dept  
BSE Limited  
25 Floor, P J Towers, Dalal Street,  
Mumbai 400001**

**Company Script Code No. : 523449**

**Subject: Submission of Annual Secretarial Compliance report for the year ended  
March 31, 2022 as per regulation 24A of SEBI (Listing Obligation and  
Disclosure Requirement) Regulation, 2015.**

Dear Madam/Sir,

Pursuant regulation 24A of SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015 read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended March 31, 2022 issued by SVD & Associates, Practicing Company Secretaries.

Kindly requested to take submission on record.

**For Sharp India Limited**

**Chandranil Belvalkar  
Company Secretary  
Encl : a/a.**



**Secretarial compliance report of Sharp India Limited  
for the year ended March 31, 2022**

To,

**Sharp India Limited,**

Gat No 686/4, Koregaon Bhima, Tal Shirur,  
Pune-412216.

We **SVD & Associates, Company Secretaries** have examined:

- a) all the documents and records made available to us through electronic mode and explanations provided by **Sharp India Limited** ("the listed entity"),
- b) the filings/ submissions made by the listed entity to the stock exchange,
- 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 **March 31, 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 ("LODR");
- 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 (Buy-Back 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) Regulations, 2014 upto August 12, 2021. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 with effect from August 13, 2021 **(not applicable to the listed entity during the Review Period)**;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 upto August 15, 2021. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations 2021 with effect from August 16, 2021 **(not applicable to the listed entity during the Review Period)**;
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 upto August 15, 2021. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations 2021 with effect from August 16, 2021 **(not applicable to the listed entity during the Review Period)**;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018;
- j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 upto June 10, 2021. The Securities and Exchange Board of India (Delisting of Equity Shares) Regulation 2021, with effect from June 11, 2021;

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:-

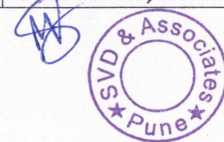
Sr. No.	Compliance Requirement (Regulations / circulars /guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 33(3)(d) of LODR requires the listed entity to submit Annual audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report and Statement on Impact of Audit Qualifications applicable only for audit report with modified opinion.  SEBI circular no.	The Annual Financial Statements for quarter and year ended on March 31, 2021 were approved in the Board Meeting held on August 16, 2021 and the same have been submitted to the Stock Exchange on August 16, 2021 with a delay of 47 days.	The listed entity shall ensure necessary compliance to the extent of deviation reported in the compliance with Regulation 33(3)(d) of LODR and timely submission of yearly financial results.



	SEBI/HO/CFD/CMD1/P/CIR/2021/556 dated April 29, 2021 provides for extension for submission of Annual Financial Statements upto June 30, 2021		
2.	Regulation 33(3)(a) of LODR requires the listed entity to submit quarterly/year to date standalone financial results to the stock exchange within forty-five days of end of each quarter other than the last quarter.	The quarterly financial results for quarter ended on June 30, 2021 approved in the Board Meeting held on October 25, 2021 have been submitted to the Stock Exchange on October 25, 2021 with a delay of 70 days.	The listed entity shall ensure necessary compliance to the extent of deviation reported in the Regulation 33(3)(a) of LODR for timely submission of Quarterly financial results.
3.	Regulation 33(3)(a) of LODR requires the listed entity to submit quarterly/year to date standalone financial results to the stock exchange within forty-five days of end of each quarter other than the last quarter.	The quarterly financial results for quarter ended on September 30, 2021 approved in the Board Meeting held on December 03, 2021 have been submitted to the Stock Exchange on December 03, 2021 with a delay of 18 days.	The listed entity shall ensure necessary compliance to the extent of deviation reported in the Regulation 33(3)(a) of LODR for timely submission of Quarterly financial results.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- (c) The following are the details of 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:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any
1.	BSE Limited	Regulation 33(3)(d) of LODR-  The Annual Financial Statements for quarter and year ended on March 31, 2021 approved in the Board	Fine Imposed of Rs. 277300/- (Inclusive of GST @ 18%) as per SEBI circular SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22,	The listed entity had paid fine and applied for waiver to BSE Ltd and the same has been granted vide email dated October 25, 2021.





		Meeting held on August 16, 2021 and the same has been submitted to the Stock Exchange on August 16, 2021 with a delay of 47 days.	2020.	
2.	BSE Limited	Regulation 33(3)(a) of LODR-  The Annual Financial Results for quarter ended on June 30, 2021 approved in the Board Meeting held on October 25, 2021 and the same has been submitted to the Stock Exchange on October 25, 2021 with a delay of 70 days.	Fine Imposed of Rs. 413000/- (Inclusive of GST @ 18%) as per SEBI circular SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22, 2020.	The listed entity had paid fine applied for waiver to BSE Ltd and the same has been granted vide email dated March 07, 2021.
3.	BSE Limited	Regulation 33(3)(a) of LODR-  The Annual Financial Results for quarter ended on September 30, 2021 approved in the Board Meeting held on December 03, 2021 and the same have been submitted to the Stock Exchange on December 03, 2021 with a delay of 18 days.	Fine Imposed on the basis of communication made by the listed entity on December 08, 2021 of Rs. 106200/- (Inclusive of GST @ 18%) as per SEBI circular SEBI/HO/CFD/CM D/CIR/P/2020/12 dated January 22, 2020.	The listed entity had paid fine applied for waiver to BSE Ltd and the same is awaited.

(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(The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The composition of the board at the beginning of the year was 4 directors, which should have been 6	March 31, 2021	The listed entity had made necessary compliance with	The action taken by the listed entity is self explanatory.

	Directors as per Regulation 17(1)(c) of LODR. Further, the listed entity had made necessary compliance under the said regulation with effect from October 02, 2020.		effect from October 02, 2020 and the application for waiver of fine imposed has been accepted by BSE.	
--	---	--	---	--

- (e) The listed entity has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment/re-appointment of statutory auditor of the listed entity.

**For SVD & Associates  
Company Secretaries**

*Meenakshi R. Deshmukh*



**Meenakshi R. Deshmukh**

Partner

FCS No: 7364

CP No: 7893

**Place:** Pune

**Date:** May 24, 2022

**Peer Review Number:** P2013MH075200

**UDIN:** F007364D000373631