

# SHARP

## 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  
CIN : L36759MH1985PLC036759

To,

28.05.2021

**Corporate Relationship Dept  
Bombay Stock Exchange 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, 2021 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, 2021 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 31<sup>st</sup> March, 2021**

To,

**Sharp India Limited**

Gat No 686/4, Koregaon Bhima, Tal Shirur,

Pune-412216

We **SVD & Associates** have examined:

- a) all the documents and records made available to us by electronic mode in view of the prevailing Pandemic situation of COVID -19 and explanation provided by **Sharp India Limited** ("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, 2021** ("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 Company during the review Period);**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buy-Back of Securities) Regulations, 2018 **(not applicable to the Company during the review Period);**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(not applicable to the Company during the review Period);**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(not applicable to the Company during the review Period);**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(not applicable to the Company 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) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;  
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.	Pursuant to Regulation 17(1)(c) of SEBI (LODR), the board of directors of the top 2000 listed entities shall comprise of not less than six directors with effect from April 1, 2020.	The composition of the board from April 01, 2020 to October 01, 2020 was not as per regulation 17(1)(c) of SEBI (LODR).	The composition of the board at the beginning of the year was 4 directors, which should have been 6 Directors under respective regulation(s). Further, the Company had made necessary compliance with effect from October 02, 2020.

- (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	The composition of the board from April 01, 2020 to October 01, 2020 was not as per regulation 17(1)(c) of SEBI (LODR) which requires of not less than six directors with effect from April 1, 2020.	BSE imposed fine for non compliance of the said period. The Company had paid the necessary fine and also requested for waiver, further the Company has received communication dated May 10, 2021 from BSE vide which it was informed that the waiver application of the Company has been approved for quarter ended June 2020 and September 2020 .	The composition of the board at the beginning of the year was 4 directors, which should have been 6 Directors under respective regulation(s). Further, the Company had made necessary compliance with effect from October 02, 2020.

(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.	NA	NA	NA	NA

(e) The company 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 Company.

**For SVD & Associates**

**Company Secretaries**

**Meenakshi**

**Rahul**

**Deshmukh**

Digitally signed by Meenakshi Rahul Deshmukh  
DN: cn=Meenakshi Rahul Deshmukh,  
c=IN, o=SVD Associates, ou=Personal,  
email=meenakshi@svd.co.in,  
serialNumber=536e4e186648d3f184e1  
42d3f2d2f283f8384998415f153370e  
87801b011  
Date: 2021.05.28 10:55:15 +0530

**Meenakshi R. Deshmukh**

**Partner**

**FCS No: 7364**

**CP No: 7893**

**Place: Pune**

**Date: May 28, 2021**

**UDIN: F007364C000381221**