CIN: L70101WB1982PLC121196

Reg. Office: CUBICLE NO.: 126, 3/2, 75C, PARK STREET, 3RD FLOOR KAMDHENU BUILDING, KOLKATA -700016
Email: shreeganeshbiotechindialtd@gmail.com Website: www.shreeganeshbiotech.com

Date: 01.01.2024

To, BSE Limited Floor 25, P J Towers, Dalal Street, Mumbai - 400 001

Re: Shree Ganesh Biotech (India) Ltd - Non-compliance under SEBI (LODR) Regulations, 2015

Ref.: Your letter dated 28th December 2023 vide reference no LIST/COMP/LP/2427/2023-24

Kind Att.: (a) Shri Shyam Bhagirath, Manager, (b) Shri Lalit Phatak, Assistance Manager

Respected Sir,

With reference to the captioned referred letter and in the matter of Shree Ganesh Biotech (India) Ltd (for brevity purposes, hereinafter referred to as "Company") - Non-compliance under SEBI (LODR) Regulations, 2015, our response as follows:

In the matter relating to Board Composition, wherein your good office observed that the DIN of Mr Kishan Naidu - Executive Director and Ms Chandni Solanki - Non-Executive - Independent Director are <u>deactivated by MCA</u> <u>due to non-filing of DIR-3 KYC</u>. However, they are **still holding director positions in the Company with deactivated DIN**. Further, the company has failed to submit a satisfactory reply to the query related to steps taken by the company/directors to reactivation the DIN.

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1.1. We are drawing your attention to Section 12A¹ of the Companies (Appointment and Qualification of Directors) Rule, 2014, wherein the responsibility is cast on the Director for filing of Form DIR-3 KYC or DIR-3KYC (web), not on the Company. Further, as of the date of this letter, the Director Identification Number of Mr Kishan Nityanand Naidu is approved. We are depicted herewith Exhibit - 1 for your ready reference.

DIN * 0866	32664
* Mand	latory Field
Submit	Clear All

	DIN Detail		
DIN		08662664 .	
Director Name		KISHAN NITYANAND NAIDU	
DIN Status		Approved	
Director of ACTIVE non-compliant company		No	
Date of Approval (if DIN status is active	ve)	08/01/2020	

#### Exhibit - 1

- 1.2. As far as Ms Chandni Solanki is concerned, she resigned from the Board of Directors on 11th September 2023, and the same event was communicated with Exchange on the same date. We are attaching herewith an acknowledgement copy and Communication letter along with a Resignation letter with your good office as **Annexure 1**.
- 1.3. Further, with regard to holding the posting of Director i.e. Mr Kishan Nityanand Naidu, we understand the provision of the Companies Act, 2013, relating to the vacation of office<sup>2</sup>, wherein we are unable to find any provision or

<sup>&</sup>lt;sup>1</sup> <u>every individual</u> who has been allotted a Director Identification Number (DIN) as on 31st March of a financial year as per these rules shall, submit e-form DIR-3-KYC to the Central Government on or before 30th April of immediate next financial year.

<sup>&</sup>lt;sup>2</sup> Section 167 of the Companies Act, 2013

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legality relating to vacation of office for not filing of DIR-3 KYC or DIR-3 KYC (Web). Further, we also do not find any enabling provision where the Director posting is vacated due to non-filing of DIR-3 KYC or DIR-3 KYC (Web). With these banal facts, we consider that the only remedial action the Company have is to request Mr Kishan Nityanand Naidu to file DIR 3-KYC or DIR-3 KYC (web) and consequently, Mr Kishan Nityanand Naidu has filed the same.

- 2. In the matter relating to Non-Compliance with SDD requirements, your esteemed office observed that <u>Based on the PCS certification submitted by the Company dated September 8, 2023, the exchange had scheduled a virtual inspection of the SDD Software of the company on September 13, 2023, to ascertain compliance. However, the Company's confirmation for SD software inspection is awaited, pending which the company continues to be treated as SDD non-compliant. Further company has not responded to the query raised by the exchange through the communication model.</u>
- 2.1. With this observation, we are likely to state and inform you that we already communicated the same with Exchange and as per our communication, the Exchange will confirm the date of inspection. The proof of the same is attached as **Annexure 2**.

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- In the matter relating to Wrong Corporate Governance Filling, wherein you self observed that the Company has wrongly shown the designation of Mr Kshan Naidu in the Corporate Governance Report filed from the quarter ended Sept 2022 till March 2023. The same was rectified by the Company only after the instruction of the exchange.
- 3.1. In the instance case, we are sincerely under obligation to Exchange for drawing our attention. Further, we have already uploaded a revamped version of Corporate Governance reports for the quarter ended Sept 2022 till March 2023 after your intervening. We assure you that complied with your observation in future also.
  - 4. In the matter relating to the publication of Notice of Board Meeting, Notice of AGM, quarterly results viz Regulation 47"Advertisement in Newspaper"
- 4.1. It is been noted from the Secretarial Audit regarding non-publication. We are herewith informing you that we have already initiated and complied with Regulation 47 of LODR, and we are submitting the acknowledgement copy as **Annexure 3**.
  - 5. We assure you that complied with LODR and other applicable regulations without human error and inconsistencies. Also, please note that after the observation received from your good office, the Board of Directors has taken the initiative step, including two-tier verification of compliance etc., put into effect to eliminate error and inconsistency in future compliance.

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- 6. Furthermore, we are treating your letter professionally and ensuring that this letter of complaint adheres to the requirements outlined in the SEBI (LODR) Regulations, 2015.
- 7. Furthermore, we have already taken corrective action and can assure that no disciplinary action will be necessary.
- 8. Moreover, we already submitted your captioned letter to exchange as per your instructions and also submitting herewith an acknowledgement copy as **Annexure 4** for your ready reference.
- 9. Please note that this letter, along with your captioned submitted letter which was presented to the Board of Directors in the meeting held on January 1st, 2023, was noted by the Board.

Thanking You,

For Shree Canesh Biotech (India) Ltd

(Wholetime Director)

DIN: 08483544

#### Encl.:

Annexure 1	Acknowledgement copy and Communication letter along
with a Resignation of Ms Chandni Solanki	

#### CIN: L70101WB1982PLC121196

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Annexure 2	Mail for Inspection of SDD Compliance	
Annexure 3	Submission of Proof of Advertisement for your ready reference	
Annexure 4	Submission of Proof of dissemination of your letter	

### Date & Time of Download: 11/09/2023 18:28:45

### **BSE ACKNOWLEDGEMENT**

Acknowledgement Number	6142134	
Date and Time of Submission	9/11/2023 6:28:23 PM.	
Scripcode and Company Name	539470 - Shree Ganesh Biotech (India) Ltd	
Subject / Compliance Regulation	Announcement under Regulation 30 (LODR)-Resignation of Director	
Submitted By	NAMITA AACHARYA	
Designation	Company Secretary & Compliance Officer	

**Disclaimer**: - Contents of filings has not been verified at the time of submission.

CIN: L70101WB1982PLC121196

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Email: shreeganeshbiotechindialtd@gmail.com Website: www.shreeganeshbiotech.club

Date: 11.09.2023

Listing Department,
BSE Limited,

P J Tower, Dalal Street Mumbai-400001 To,

The Secretary, The Calcutta Stock Exchange

Ltd,

7, Lyons Range, Kolkata - 700001 To,

Head - Listing

Metropolitan Stock Exchange of India

Limited

Vibgyor Towers, 4th floor, Plot No C 62, Opp. Trident Hotel Bandra Kurla Complex,

Bandra (E), Mumbai – 400098

Scrip Code: 539470

Scrip Code: 29221

Scrip Code: SHREEGANES

Sub: Regulation 30(6) read with Part A of Schedule III, SEBI LODR 2015

Pursuant to Regulation 30(6) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we would like to inform you that herewith we have attached the resignation letter from Ms Chandani Solanki dated 11.09.2023 along with disclosures as under

(i)Names of listed entities in which the resigning director holds directorships, indicating the category of directorship and membership of board committees-

SR NO	Name of Company	CIN	Category	Membership of board committees
1	COLAB CLOUD PLATFORMS LIMITED	L65993DL1989PLC038194	Independent Director	NA .

(ii) The independent director shall, along with the detailed reasons, also provide a confirmation that there is no other material reasons other than those provided.

Sr No	Particulars	Details
1	Reason for change viz. appointment, resignation, removal, death or otherwise;	Reason: Resignation due to pre-occupation in other works. Other than reason mentioned in the
	has the first of t	resignation letter, there was no other material reasons.
2	Date of Resignation	11.09.2023

Thanking You.

Yours Faithfully,

For SHREEF GANESH BIO-TECH (INDIA) LIMITED

Patel Patel

#### CHANDNI SOLANKI

Address: A-2,SHAIVAL SHOHAM PARK.,VASTRAPUR LAKE,AHMEDABAD,GUJRAT-380054

Date: 11.09.2023

To
The Board of Directors,
LUCENT INDUSTRIES LIMITED
INDORE

Sub: Resignation from the position of Director

Dear Sir/Madam,

I hereby tender my resignation as a Director of the Company due to preoccupation with other work and request you to put up the same before the meeting of the Board of Directors of the Company. I also request you to give a notice of my resignation to the Registrar of Companies, West Bengal.

CHILDARAS SUCELLO

I thank the other members on the Board for giving me the co-operation and assistance to discharge my duties during my tenure as a Director of the Company.

Thanking You

Yours sincerely,

(CHANDNI SOLANKI)

DIN: 08705082



### Virtual Inspection of SDD Software - Shree Ganesh Biotech (India) Ltd.

Shree Ganesh Bio- Tech <shreeganeshbiotechindialtd@gmail.com> To: Yash Gala <yash.gala@bseindia.com>

Mon, Jan 1, 2024 at 12:27 PM

Respected Sir,

Kindly schedule the virtual inspection for SDD compliance.

Please provide the list of documents which you need for the same.

[Quoted text hidden]

### Date & Time of Download: 09/11/2023 17:52:40

### **BSE ACKNOWLEDGEMENT**

Acknowledgement Number	6434218
Date and Time of Submission	11/9/2023 5:52:32 PM
Scripcode and Company Name	539470 - Shree Ganesh Biotech (India) Ltd
Subject / Compliance Regulation	Announcement under Regulation 30 (LODR)-Newspaper Publication
Submitted By	NAMITA AACHARYA
Designation	Company Secretary & Compliance Officer

**Disclaimer**: - Contents of filings has not been verified at the time of submission.

### Date & Time of Download: 01/01/2024 14:39:02

### **BSE ACKNOWLEDGEMENT**

Acknowledgement Number	6618394	
Date and Time of Submission	12/28/2023 5:15:56 PM	
Scripcode and Company Name	539470 - Shree Ganesh Biotech (India) Ltd	
Subject / Compliance Regulation	Advisory Letter Received From BSE Limited Dated 28.12.2023	
Submitted By	NAMITA AACHARYA	
Designation	Company Secretary & Compliance Officer	

Disclaimer: - Contents of filings has not been verified at the time of submission.