

SPRIGHT AGRO LIMITED

(Formerly Known as Tine Agro Limited)

CIN NO. L01100GJ1994PLC117990

Reg. Office: Office No. 1216, Shilp Epitom, Rajpath - Rangoli Road, Off Sindhu Bhavan Road,
Bodakdev, Bodakdev, Ahmedabad, Ahmadabad City, Gujarat, India, 380054

E mail Id: kansalfiberltd@gmail.com, Contact No. 7600916324

Website: www.tineagro.in

Date: 27/04/2024

To
The BSE Limited
P.J. Towers,
Dalal Street,
Mumbai- 400001.

Scrip Code: 531205

Sub: Annual Secretarial Compliance Report

Dear Sir,

We refer to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8,2019, with regard to filling of Annual Secretarial Compliance Report.

Accordingly we enclose herewith Annual Secretarial Compliance Report of the Company certified by M/s. Dharti Patel & Associates, Practicing Company Secretaries for the Financial year ended March, 31, 2024.

The above said report will also be uploaded on Company's website.

Thanking You.

Yours sincerely,
Spright Agro Limited
(Formerly known as Tine Agro Limited)

Akshaykumar Nathubhai Patel
Managing Director
DIN: 08067509



Dharti Patel & Associates,

Company Secretaries

01, Suvas Bunglows,

New C.G. Road,

Chandkheda,

Ahmedabad-382424

M: 7487033350, Email: csdhartipatel@gmail.com

SECRETARIAL COMPLIANCE REPORT

SPRIGT AGRO LIMITED

(FORMERLY KNOWN AS TINE AGRO LIMITED)

FOR THE YEAR ENDED ON 31ST MARCH, 2024

[Pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February,08, 2019]

I have examined,

- (a) All the documents and records made available to us and explanation provided by the Company and its officers;
- (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, 2024 ("Review Period") in respect of compliance with the provisions of:

- (a) The Securities and Exchange Board of India Act, 1992("SEBI Act") and regulations, circulars, guidelines issued thereunder; and
- (b) The Securities Contracts (Regulations) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

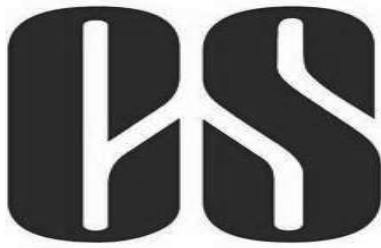
The Specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- (c) Securities and Exchange Board of India (Registrar to an issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client.

As per the representations made by the management and relied upon by me, during the period under review, provisions of the following regulations were not applicable to the Company:

- (a) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;





Dharti Patel & Associates,

Company Secretaries

01, Suvas Bunglows,

New C.G. Road,

Chandkheda,

Ahmedabad-382424

M: 7487033350, Email: csdhartipatel@gmail.com

- (b) Securities and Exchange Board of India (Buy Back of securities) Regulations, 2018;
- (c) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (d) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; and
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021;

And based on the above examinations, I hereby report that, during the Review Period:

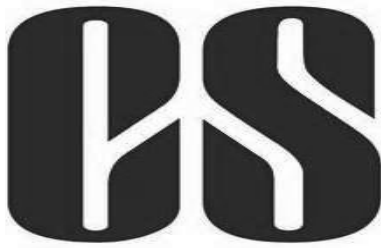
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:

| Sr. No. | Compliance Requirements (Regulations/ circulars/ guidelines including Specific Clause) | Deviations | Observations/Remarks of the Practicing Company Secretary |
|---------|--|------------|--|
| None | | | |

- (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 my 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 letters, debarment etc. | Observations/ remarks of the Practicing Company Secretary, if any |
|---------|-----------------|---|---|---|
| 1. | BSE | Regulation 6(1) Non-compliance with requirement to appoint a qualified company secretary as the compliance officer | Fine | NIL |





Dharti Patel & Associates,

Company Secretaries

01, Suvas Bunglows,

New C.G. Road,

Chandkheda,

Ahmedabad-382424

M: 7487033350, Email: csdhartipatel@gmail.com

- (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 previous year ended | Actions taken by the listed entity, if any. | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---------|--|--|---|--|
| None | | | | |

DATE: 26/04/2024

PLACE: AHMEDABAD

For M/S DHARTI PATEL & ASSOCIATES,
COMPANY SECRETARIES,



DHARTI PATEL

PROPRIETOR

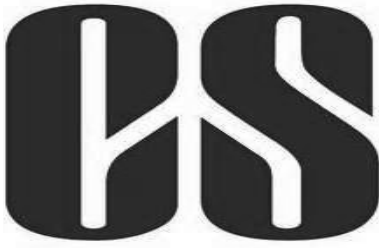
M. No.: F12801

C.P. No.:19303

UDIN: F012801F000254130

PEER REVIEW CERTIFICATE No.: 4617/2023

NOTE: THIS REPORT IS TO BE READ WITH OUR LETTER OF EVEN DATE WHICH IS ANNEXED AS ANNEXURE A AND FORMS AN INTEGRAL PART OF THIS REPORT.



Dharti Patel & Associates,

Company Secretaries

01, Suvas Bunglows,

New C.G. Road,

Chandkheda,

Ahmedabad-382424

M: 7487033350, Email: csdhartipatel@gmail.com

ANNEXURE A

SECRETARIAL COMPLIANCE REPORT

SPRIGHT AGRO LIMITED

(FORMERLY KNOWN AS TINE AGRO LIMITED)

FOR THE YEAR ENDED ON 31ST MARCH, 2024

[Pursuant to SEBI circular CIR/CFD/CMD1/27/2019 dated February,08, 2019]

My report of even date is to be read along with this letter.

1. Maintenance of secretarial record is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. Where ever required, I have obtained the Management representations about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of applicable laws, rules and regulations is the responsibility of management. My examination was limited to the verification of procedures on test basis.
5. The compliance report in neither an assurance as to the future viability of the company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Date: 26/04/2024

Place: Ahmedabad

**For M/S Dharti Patel & Associates,
Company Secretaries,**

Dharti Patel

Proprietor

M. No.: F12801

C.P. No.:19303

UDIN: F012801F000254130

PEER REVIEW CERTIFICATE No.: 4617/2023