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**SHERVANI INDUSTRIAL SYNDICATE LIMITED**

28.05.2019

To,  
The BSE Ltd.  
Listing Department,  
Phiroz Jeejeebhoy Tower,  
25<sup>th</sup> Floor, Dalal Street,  
Mumbai- 400001

Scrip Code- 526117

**Sub:** Submission of "Annual Secretarial Compliance Report" for the period ended 31<sup>st</sup> March 2019 with reference to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup>Feb,2019


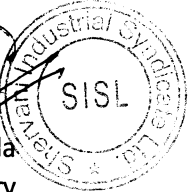
Dear Sir,

With reference to above, please find enclosed herewith the "Annual Secretarial Compliance Report" dated 20<sup>th</sup> May, 2019 for the period ended 31<sup>st</sup> March, 2019 as received from M/s Siddiqui & Associates, Practising Company Secretaries, New Delhi.

You are kindly requested to acknowledge and update the same in your records.

Thanking You,

For Shervani Industrial Syndicate Limited,

  
S. K. Shukla  
Company Secretary  


# Siddiqui & Associates

## Company Secretaries

Phone 011-41401301 Mobile: 98110-35621 Email: [info@siddiassociates.com](mailto:info@siddiassociates.com); [primekoss@hotmail.com](mailto:primekoss@hotmail.com)  
Web Site : <http://www.siddiassociates.com>

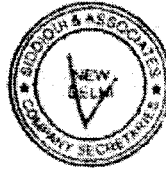
To,

The Members  
Shervani Industrial Syndicate Limited  
Shervani Nagar  
Sulem Sarai Harwara  
Prayagraj 211015 UP

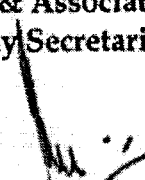
Our Report of even date is to be read along with this letter.

1. Maintenance of record is the responsibility of the Management of the Company. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices we followed provide a reasonable basis for our opinion
3. Where ever required, we have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
4. The Compliance of the provisions of SEBI Laws, rules, regulations, standards is the responsibility of Management. Our examination was limited to the verification of procedures on test basis.
5. As regards the books, papers, forms, reports and returns filed by the Company under these regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of the Management. Our examination was limited to checking the execution and timeliness of the filed of various forms, reports, returns and documents that need not to be filed by the Company under said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

for Siddiqui & Associates  
Company Secretaries



Place New Delhi  
Dated 20<sup>th</sup> May 2019

  
K. O. Siddiqui  
FCS 2229; CP 1284

K.O. SIDDQUI  
FCS 2229, CP 1284  
SIDDQUI & ASSOCIATES  
COMPANY SECRETARIES  
D-19, SARITA VIHAR  
NEW DELHI - 110 076

# Siddiqui & Associates

## Company Secretaries

Phone 011-41401301 Mobile: 98110-35621 Email: [info@siddiassociates.com](mailto:info@siddiassociates.com); [primekoss@hotmail.com](mailto:primekoss@hotmail.com)  
Web Site : <http://www.siddiassociates.com>

### Annual Secretarial Compliance Report of Shervani Industrial Syndicate Limited for the year ended 31<sup>st</sup> March 2019

I, K. O. Siddiqui, Practicing Company Secretary have examined:

- all the documents and records made available to us and explanation provided by Shervani Industrial Syndicate Limited CIN No. L45202UP1948PLC001891
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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 2019 in respect of compliance with the provisions of:

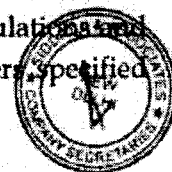
- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange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

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; Not Applicable for the year ended 31<sup>st</sup> March, 2019
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable for the year ended 31<sup>st</sup> March, 2019
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable for the year ended 31<sup>st</sup> March, 2019
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable for the year ended 31<sup>st</sup> March, 2019
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on the above examination, I hereby report that, during the Review Period:

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



D 49 Sarita Vihar, New Delhi 110 076, India.

Sr. No	Compliance Requirement (Regulations circulars guidelines including specific clause)	Deviations	Observations Remarks of the Practicing Company Secretary
	NIL	NIL	NIL

ii. 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/our examination of those records.

iii. 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.
	NIL	NIL	NIL	NIL

iv. 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 earlier year ended NA	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable as this is the first year of Reporting				

Place New Delhi  
Date: 20.05.2019



for Siddiqui & Associates  
Company Secretaries

**K. O. SIDDIQUI**  
FCS 2229; CP 1284

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D-49, SARITA VIHAR  
NEW DELHI - 110 076

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