



# SHREE HARI CHEMICALS EXPORT LIMITED

CORPORATE OFF.: 401/402, A-Wing, Oberoi Chambers, Opposite SAB TV, New Link Road, Andheri West, Mumbai 400 053.  
Tel.: (91-22) 49634834 ● E-mail: info@shreeharichemicals.in  
Website: www.shreeharichemicals.in ● CIN No. L99999MH1987PLC044942

Date: May 20, 2023

To,  
The General Manager  
DCS-CRD  
BSE LIMITED  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400 001

**Scrip code: 524336**

**Sub: Secretarial Compliance Report for the year ended March 31, 2023**

Dear Sir,

Pursuant to the Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015, enclosed please find 'Secretarial Compliance Report' for the year ended March 31, 2023.

For **SHREE HARI CHEMICALS EXPORT LIMITED**

URVASHI  
HARSHAD  
PANDYA

Digitally signed by URVASHI HARSHAD PANDYA  
DN: c=IN, postalCode=400097, st=MAHARASHTRA,  
ou=SHREE HARI CHEMICALS EXPORT LIMITED, ou=PERSONAL,  
serialNumber=7472807450a0a0cc1d24a20652033f3c376ab008d  
302665202c530605070a  
pseudoym=4fa160a0e1342f7b23401888b77781d,  
2.5.2.20-04013038844973a778791467168617a6a186c30944  
4a2792830a05, email=CURVASHIPANDYA@GMAIL.COM,  
cn=URVASHI HARSHAD PANDYA  
Date: 2023.05.20 15:09:55 +05'30'

**URVASHI PANDYA**  
Company Secretary & Compliance Officer

Encl: As aforesaid

Secretarial Compliance Report of Shree Hari Chemicals Export Limited for the year ended March 31, 2023

To,  
**SHREE HARI CHEMICALS EXPORT LIMITED**  
A/8 MIDC Mahad Dist - Raigad Maharashtra

We Parikh & Associates have examined:

- a) all the documents and records to the extent made available to us and explanation provided by **Shree Hari Chemicals Export 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 March 31, 2023 ("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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (Not applicable to the company during the review period)
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the company during the review period)
- e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the company during the review period)
- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; ( Not applicable to the company during the review period)

- g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;  
and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, We hereby report that, during the Review Period:

We hereby report that, during the Review Period:

- a) The listed entity has generally 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) | Regulation/Circular No. | Deviations | Action Taken by | Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.) | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|---------|---|-------------------------|------------|-----------------|--|----------------------|-------------|--|---------------------|---------|
| NIL     |   |                         |            |                 |  |                      |             |  |                     |         |

- b) The listed entity has taken the following actions to comply with the observations made in previous reports:

| Sr. No.        | Compliance Requirement (Regulations/circulars/guidelines including specific clause) | Regulation/Circular No. | Deviations | Action Taken by | Type of Action (Advisory/Clarification/Fine/Show Cause Notice/Warning, etc.) | Details of Violation | Fine Amount | Observations/Remarks of the Practicing Company Secretary | Management Response | Remarks |
|----------------|---|-------------------------|------------|-----------------|--|----------------------|-------------|--|---------------------|---------|
| NOT APPLICABLE |   |                         |            |                 |  |                      |             |  |                     |         |

**Additional affirmations by Practicing Company Secretaries (PCS) in Annual Secretarial Compliance Report (ASCR):**

| Sr. No. | Particulars   | Compliance status<br>(Yes/No/NA) | Observations<br>/Remarks by PCS* |
|---------|---|----------------------------------|----------------------------------|
| 1.      | <p><u>Secretarial Standard</u></p> <p>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI).</p>  | Yes                              |                                  |
| 2.      | <p><u>Adoption and timely updation of the Policies:</u></p> <p>All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities</p> <p>All the policies are in conformity with SEBI Regulations and has been reviewed &amp; timely updated as per the regulations/circulars/guidelines issued by SEBI</p>  | Yes                              |                                  |
| 3.      | <p><u>Maintenance and disclosures on Website:</u></p> <p>The Listed entity is maintaining a functional website</p> <p>Timely dissemination of the documents/information under a separate section on the website</p> <p>Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website</p> | Yes                              |                                  |
| 4.      | <p><u>Disqualification of Director:</u></p> <p>None of the Directors of the Company are disqualified under Section 164 of Companies Act, 2013</p>   | Yes                              |                                  |

|    |   |     |   |
|----|---|-----|---|
| 5. | <p><u>To examine details related to Subsidiaries of listed entities:</u></p> <p>Identification of material subsidiary companies<br/>Requirements with respect to disclosure of material as well as other subsidiaries.</p>  | NA  | The Company does not have any subsidiary Company. |
| 6. | <p><u>Preservation of Documents:</u></p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>   | Yes |   |
| 7. | <p><u>Performance Evaluation:</u></p> <p>The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees every financial year /during the financial year as prescribed in SEBI Regulations.</p>   | Yes |   |
| 8. | <p><u>Related Party Transactions:</u></p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions.<br/>b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit committee.</p> | Yes |   |
| 9. | <p><u>Disclosure of events or information:</u></p> <p>The listed entity has provided all the required disclosure(s) under Regulation 30 alongwith Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>   | Yes |   |

|     |  |     |  |
|-----|--|-----|--|
| 10. | <u>Prohibition of Insider Trading:</u><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) of SEBI (Prohibition of Insider Trading) Regulations, 2015.   | Yes |  |
| 11. | <u>Actions taken by SEBI or Stock Exchange(s), if any:</u><br><br>No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder. | Yes |  |
| 12. | <u>Additional Non-compliances, if any:</u><br><br>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.  | Yes |  |

\*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

#### Assumptions & Limitation of scope and Review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to certify based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Mumbai  
Date: 20.05.2023

For Parikh & Associates

JAYARAM  
UMESH POOJARI

Signature:

Name of the Practicing Company Secretary: J. U. Poojari  
Partner  
FCS No: 8102 CP No: 8187  
UDIN: F008102E000342821  
PR No.: 1129/2021

Digitally signed by JAYARAM UMESH POOJARI  
DN: cn=JAYARAM UMESH POOJARI, o=Parikh & Associates, ou=Maharashtra,  
c=IN, email=jayaram.poojari@parikhassociates.com, serial=1129,  
date=2023.05.20 15:10:38 +05'30'