

SHREE GANESH BIO-TECH (INDIA) LIMITED

CIN:L70101WB1982PLC121196

Reg. Office: 6TH FLOOR, PREMISES 602, MAHAVIR APARTMENT 2, ASHUTOSH MUKHERJEE ROAD KOLKATA-700020

Email: shreeganeshbiotechindiaLtd@gmail.com

Date: 23.06.2021

To,
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

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the Financial Year 2020-21

In compliance with **SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019**, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2021 issued by secretarial auditor Mr. Haresh Kapuriya Practicing Company Secretaries. You are requested to take the same on your record.

Thanking you,

Yours faithfully,

FOR, SHREE GANESH BIOTECH (INDIA) LTD



Director/Authorised Signatory



ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial compliance report of Shree Ganesh Biotech (India) Ltd. for the year ended 31st March 2021.

We have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. SHREE GANESH BIOTECH (INDIA) LTD** ("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 on **March 31, 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

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

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not Applicable to during the review period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the Review Period)**

Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable 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 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 Participants) Regulations, 1996 up to October 2, 2018 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 w.e.f. October 3, 2018;

and circulars/ guidelines/Amendments issued there under,

and based on the above examination, 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 there under to the extent applicable and in the manner prescribed, 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	Non-compliance with provisions of Regulation 17(1) of SEBI (LODR) Regulations, 2015, for the quarter ended June 30, 2020".	Non-compliance with the Requirements pertaining to the composition of the Board.	The Company has complied in due course and appointed 2 directors on the board of the company on board meeting held on 21 st March,2020. It is pertinent to note that due to Covid-19 relaxation granted by MCA by their circular the company have filed the said form on 24 th August, 2020.Thus company has requested exchange to the review penalty and waive it off.
2	Non-compliance with provisions of Regulation 27(2) of SEBI (LODR) Regulations, 2015, for the quarter ended June 30, 2020".	Non-compliance with the Requirements pertaining to the composition of the Board.	The Company has complied in due course and appointed 2 directors on the board of the company on board meeting held on 21 st March,2020. It is pertinent to note that due to Covid-19 relaxation granted by MCA by their circular the company have filed the said form on 24 th August, 2020.Thus company requested exchange to the review penalty and waive it off.





3	Reminders for freezing of promoter demat account for Non-compliance/non-payment of fines for Regulation 17(1) of SEBI (LODR) Regulations, 2015, for the quarter ended June 30, 2020".	Non-compliance with the Requirements pertaining to the composition of the Board.	The company has complied in due course and requested exchange to review penalty and waive it off.
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- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under 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 there under:

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	Non-compliance with provisions of Regulation 17(1) of SEBI (LODR) Regulations, 2015, for the quarter ended June 30, 2020".	Levied monetary fines	Company has complied in due course and requested exchange to review penalty and waive it off.
2	MSEI LIMITED	Non-compliance with provisions of Regulation 17(1) of SEBI (LODR) Regulations, 2015, for the quarter ended June 30, 2020".	Levied monetary fines	Company has complied in due course and requested exchange to review penalty and waive it off.
3	MSEI LIMITED	Listing of shares issued on a preferential basis on MSEI	Levied Penalty with Interest	Company has paid the penalty with interest. The Company has received the Listing Letter from MSEI for listing of securities as per preferential basis on MSEI.

K. R. B. S.
Practicing Company Secretary



KH & ASSOCIATES

Practicing Company Secretaries

(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 31 st March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Place: Vadodara

Date: 23-06-2021

UNDIN: A026109C000502508

For, KH & Associates

Practicing Company Secretary



Kapuriya

CS Hareesh Kapuriya
Partner

C. P. No.: 16749

Membership No. 26109