



30th May, 2022

**BSE LIMITED**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400001  
**Scrip Code: 540738**

**Sub: Annual Secretarial Compliance Report for the Financial Year ended 31st March, 2022.**

Dear Sir/ Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we are enclosing herewith a copy of Annual Secretarial Compliance Report for the financial year ended 31st March, 2022 issued by M/s. Sanjay Sangani & Co., Practicing Company Secretaries.

Kindly take the same on records.

Yours Faithfully

**For Shreeji Translogistics Limited**

D.B. Badiyani



**Divyesh Badiyani**

**Company Secretary & Compliance Officer**



**Sanjay H. Sangani**

B.Com., F.C.S., A.C.A.

Unit No. 86, Third Floor,  
Ratna Jyot Indl. Estate, Irla Lane,  
Vile Parle (W), Mumbai - 400 056.  
Telephone : 022 - 2628 2604  
E-mail : sanjay.sangani@gmail.com**SECRETARIAL COMPLIANCE REPORT OF  
SHREEJI TRANSLOGISTICS LIMITED  
FOR THE YEAR ENDED 31ST MARCH, 2022**

We have examined:

- (a) all the documents and records made available to us and explanation provided by Shreeji Translogistics 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 31st March, 2022 ("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) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(Note: Since the listed entity was listed on SME Platform of BSE Limited during part of the period under review, some requirements of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 including the corporate governance provisions i.e. Regulations 17 to 27 and clauses (b) to (i) and (t) of Regulation 46 (2) and para C, D and E of Schedule V were not applicable to the listed entity prior to 17th January, 2022.)

- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;





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- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buy-back 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) Regulations, 2014 (upto August 12, 2021) / The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (w.e.f. August 13, 2021); **(Not Applicable to the Company during the Review Period)**
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (upto August 15, 2021) / The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (w.e.f. August 16, 2021); **(Not Applicable to the Company during the Review Period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Redeemable Preference Shares) Regulations, 2013 (upto August 15, 2021) / The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (w.e.f. August 16, 2021); **(Not Applicable to the Company during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;

and based on the above examination, we 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 Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 33 of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 - The financial results for the half year ended 30th September, 2021 were required to be submitted to the Stock Exchange on or before 14th November, 2021 i.e. within 45 days from the end of half year.	The financial results for the half year ended 30th September, 2021 were submitted to the Stock Exchange on 1st December, 2021 i.e. with a delay of 16 days	There was a delay in submission of financial results for the half year ended 30th September, 2021, by 16 days due to a medical exigency. The Company submitted Disclosure of reasons for delay in submission of Financial Results and also paid the fine of Rs. 94,400/- (Basic Fine of Rs. 80,000/- plus GST Rs. 14,400/-) levied by BSE Limited. The Company shall take adequate measures to comply with the same in the future.



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- (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 our examination of those records.
- (c) (i) The following are the details of actions taken against the listed entity/ its promoters/ directors 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
1.	BSE Limited	The financial results for the half year ended 30th September, 2021 were submitted on 1st December, 2021 i.e. with a delay of 16 days.	BSE Limited levied a fine of Rs. 94,400/- (Basic Fine of Rs. 80,000/- plus GST Rs. 14,400/-)	The Company has paid the fine levied by the Stock Exchange.

- (ii) The listed entity does not have any material subsidiary.
- (d) The listed entity has taken the following actions to comply with the observations made in the 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...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

(Note: Since the listed entity was listed on SME Platform of BSE Limited during the preceding financial year 2020-21, it was not required to submit Secretarial Compliance Report as the corporate governance provisions, including Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015, were not applicable to the listed entity during the preceding financial year.)



# **SANJAY SANGANI & CO.**

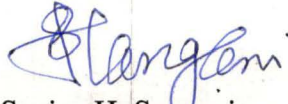
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- (e) The listed entity has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in the terms of appointment of Statutory Auditor of the listed entity.

For Sanjay Sangani & Co.

Company Secretaries

Peer Review Certificate No. : 1689/2022



Sanjay H. Sangani

Proprietor

M. No. : FCS 4090

C.P. No. : 3847



UDIN : F004090D000412872

Mumbai, 27th May, 2022