July 30, 2020

To,

Bombay Stock Exchange Ltd.
Phiroze Jeejeebhoy Towers,
Exchange Plaza, Dalal Street
Mumbai - 400 001

National Stock Exchange of India Ltd.
5th Floor, Plot No. C/1, G Block,
Bandra - Kurla Complex, Bandra
Mumbai - 400 051

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the financial year ended 31st March, 2020

With reference to the captioned subject and in compliance with the provisions of Regulation 24A of SEBI (LODR) Amendment Regulations, 2018, read with SEBI Circular bearing reference'CIR/CFD/CMDl/27 /2019' dated February 08, 2019, please find enclosed Annual Secretarial Compliance Report of the Company issued by M/s. Kotak & Associates for the financial year ended 31st March, 2019.

Kindly take the same on your records.

Thanking You,

For Sharon Bio- Medicine Limited

Sd/-

Authorised Signatory

Encl: As above

KOTAK & ASSOCIATES
PRACTISING COMPANY SECRETARIES
Office Add :- Office No. 2, First Floor, Vrindavan Valley, Opposite to Vanashree Building, Khadakpada, Kalyan (W) 421301.
(M) : +91-8530544341 / 8668444071
: cskinjalkotak@outlook.com / info@kotakassociates.com
: www.kotakassociates.com

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(g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; (Not applicable for the period under review)

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

[redacted]

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are not able to proceed with the e-voting process and the Annual General Meeting (AGM) could not be conducted within the specified time.

In light of the above and based on information provided, submission made and documents provided, 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 REQUIREMENT (REGULATIONS/ CIRCULARS / GUIDELINES INCLUDING SPECIFIC CLAUSE)	DEVIATIONS	OBSERVATIONS/ REMARKS OF THE PRACTICING COMPANY SECRETARY
1.	*Regulation 17,18,19,20,24A,25,29,34,36,38, 44,46 of SEBI (LODR)Regulations, 2015*	*The present Board though incapacitated in terms of IBC Regulations does not even have minimum prescribed no. of Directors. Accordingly all the committees of the Board are also short of required no. of members and further due to absence of Directors, the Company is not able to comply with many other provisions of the said Regulation.*	*As per the Note given above- the Company was under CIRP and now the Company is in the process of implementing the Resolution Plan and new Board of Directors shall be formed subsequently*
2.	*Regulation 34 of SEBI (LODR)Regulations, 2015*	*The company has not conducted Annual General Meeting (AGM) and is noncompliant with respect to the provisions of submission of annual report for the year ended March 31, 2019.*	*As per the Note given above- the Company was under CIRP and now the Company is in the process of implementing the Resolution Plan.*
3.	*Regulation 78(6) of SEBI (LODR)*	*Interest and principal of, AGM of Regulation 2015 of SEBI*	*There is a non compliance*

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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 my/our examination of those records.

Due to the COVID - 19 Pandemic and the restrictions imposed due to the same, physical verification of documents and records have been impacted and hence reliance has been placed on the scanned soft copies of various documents/records which were provided

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Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended. *(The years are to be mentioned)*	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non—compliance of Regulation 31, 33 and Regulation 34 of SEBI (LODR) Regulations		The Company and its Directors have	Actions taken by the listed

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It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all pplicable SEBI Regulations and circulars/ guidelines issued thereunder from time to time and issue a report thereon.

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