



SHARAT INDUSTRIES LIMITED

CIN - L05005AP1990PLC011276

Regd. Off. : Feed Plant, Hatchery & Farm

Venkanna Palem Village, T.P. Gudur Mandal, Nellore - 524 002, Nellore Dist, A.P.

Processing Plant : Mahalakshmpuram Village, T.P. Gudur Mandal, Nellore - 524 002, Nellore Dist, A.P.

E-mail : accounts@sharatindustries.com, Website : www.sharatindustries.com

30th May 2025

To
BSE Limited
Corporate Relationship Department
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Scrip Code: 519397

Dear Sir / Madam,

Sub.: Annual Secretarial Compliance Report for the Year Ended 31st March 2025.

In line with the requirements of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No: CIR/CFD/CMD1/27/2019 dated 8th February 2019; we are submitting herewith the Annual Secretarial Compliance Report issued by Mr. Prabhakar Chandrasekaran, (Membership Number F11722 and CP Number: 11033) Partner of M/s. BP & Associates, Practicing Company Secretaries dated 30th May, 2025 for the year ended 31st March, 2025.

The report is also being filed online in XBRL & PDF format for the FY2024-25.

Please take the above information on record

Thanking You,

Yours Sincerely,

For SHARAT INDUSTRIES LIMITED

GANESAN NILAKANATAN
COMPANY SECRETARY & COMPLIANCE OFFICER
M:NO: A8407

Corporate Off. : Flat No. 4, 3rd Floor, Pallavi Apartments,
No. 57/11, Old No. 29/TF4, 1st Main Road,
HDFC Bank Compound, R.A.Puram, CHENNAI - 600 028.
Contact No. : 044-24347867 / 24357868.
E-mail : chennai@sharatindustries.com

Nellore Off. : 16-6-143, Opp. Manasa Apartment,
Srinivasa Agraharam, Nellore - 524 001.
Tel. No. : 0861 - 2331727
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Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF SHARAT INDUSTRIES LIMITED FOR THE YEAR ENDED 31ST MARCH 2025.

[Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015]

We have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **Sharat Industries Limited** (hereinafter referred as 'the listed entity'), having its Registered Office at Venkannapalem Village, T P Gudur Mandal, Nellore, Andhra Pradesh, 524 002. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide our observations thereon.

Based on our verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, we hereby report that the listed entity has, during the review period covering the financial year ended on 31st March, 2025 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter :

We have examined:

- a) All the documents and records made available to us and explanations provided by **SHARAT INDUSTRIES LIMITED**
- 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 2025 ("Review Period") in respect of compliance with the provisions of:





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

- i. Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- ii. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- iii. Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- iv. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the Company during the audit period);
- v. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (Not applicable to the Company during the audit period);
- vi. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and circulars/ guidelines issued thereunder;





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- vii. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable to the Company during the audit period);
- viii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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

- i. a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except as given below:

Sr. No	Observations / Remarks of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended (the years are to be mentioned)	Compliance Requirements (Regulations / circulars/ guidelines including specific clause)	Details of violation / deviation and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
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- b) The listed entity has taken the following actions to comply with the observations made in previous reports: As given in Annexure -A





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II. we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1.	<u>Secretarial Standards:</u> The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	None
2.	<u>Adoption and timely Updation of the Policies:</u> <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities• All the policies are in conformity with SEBI Regulations and has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	None
3.	<u>Maintenance and disclosures on Website:</u> <ul style="list-style-type: none">• The Listed entity is maintaining a functional website• Timely dissemination of the documents/ information under a separate section on the website• 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.	Yes	None
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	None





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Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
5.	<u>Details related to Subsidiaries of listed entities:</u> (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	NA
6.	<u>Preservation of Documents:</u> 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.	Yes	None
7.	<u>Performance Evaluation:</u> The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations	Yes	None
8.	<u>Related Party Transactions:</u> a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. (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	Yes	None
9.	<u>Disclosure of events or information:</u> The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10.	<u>Prohibition of Insider Trading:</u> The listed entity is in compliance	Yes	None





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Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
	with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015		
11.	<p><u>Actions taken by SEBI or Stock Exchange(s), if any:</u></p> <p>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 (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	Yes	None
12.	<p><u>Resignation of statutory auditors from the listed entity or its material subsidiaries</u></p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	NA	NA
13.	<p><u>Additional Non-compliances, if any:</u></p> <p>No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc</p>	Yes	None

We further, report that the listed entity is in compliance/ not in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulation 46(2) (za) of the LODR Regulations - 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 report 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.

Date: 30th May, 2025
Place: Chennai



FOR BP & ASSOCIATES
COMPANY SECRETARIES
PEER REVIEW NO: P2015TN040200

PRABHAKAR CHANDRASEKARAN
PARTNER
M NO: F11722 | CP NO: 11033
UDIN: F011722G000497218

Annexure - A

Sr. No	Observations/ Remarks of the Practicing Company Secretary in the previous reports) (PCS)	Observations made in the secretarial compliance report for the year ended.... (the years are to be mentioned)	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
1	Due to inadvertent classification of "Public" shareholder's in "promoters" category the Company was not able to maintain 100% shareholding of the promoter's in dematerialized form	2021-2022	Regulation 31(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulation 2015 requires company to maintain 100% of shareholding of the promoters in dematerialized form	In view of the said classification which was carried out inadvertently by the Company, bringing some "Public Shareholder in the promoters category and classifying the same as "Promoters" resulting in the Company not able to maintain the 100% of shareholding of "promoters" in dematerialized form.	The Company is in the process of filing an application under Regulation 102 of SEBI (LODR) Regulations, 2015, seeking relaxation from strict compliance with Regulation 31A to rectify the misclassification of certain public shareholders as promoters.	The approach appears appropriate under the circumstances. However, filing of the application and active follow-up with SEBI are essential to effectively resolve the misclassification of public shareholders as promoters and to ensure compliance with Regulation 31A.



2	The Company was not in position to comply with the procedure for reclassification of promoters as majority of Shareholders classified as "promoters" were not traceable	2021-2022	Regulation 31 A of SEBI (Listing Obligation and Disclosure Requirement) Regulation 2015 requires to follow the procedure for reclassification of promoters	<p>At the time of Initial Public offer, some of the Shareholder belonging to the "Public" category was inadvertently classified as "promoters"</p> <p>At the time of filing shareholding pattern for the quarter ended 30th September 2020, the Company encountered difficulty for loading shareholding data in XBRL form as PAN details of all the promoters were required. Hence the Company filed the shareholding pattern with actual four promoters for whom the details of PAN were available.</p>	The Company is in the process of filing an application under Regulation 102 of SEBI (LODR) Regulations, 2015, seeking relaxation from strict compliance with Regulation 31A to rectify the misclassification of certain public shareholders as promoters.	The approach appears appropriate under the circumstances. However, filing of the application and active follow-up with SEBI are essential to effectively resolve the misclassification of public shareholders as promoters and to ensure compliance with Regulation 31A.
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3	Due to inadvertent classification of promoters the Company is not in position to transfer securities of the promoters.	2021-2022	Regulation 40 of the SEBI (Listing Obligation and Disclosure Requirement) Regulation 2015 requires the transfer and transmission of securities between the promoters of the Company.	At the time of Initial Public offer, some of the Shareholder belonging to the "Public" category was inadvertently classified as "promoters"	The Company is in the process of filing an application under Regulation 102 of SEBI (LODR) Regulations, 2015, seeking relaxation from strict compliance with Regulation 31A to rectify the misclassification of certain public shareholders as promoters.	The approach appears appropriate under the circumstances. However, filing of the application and active follow-up with SEBI are essential to effectively resolve the misclassification of public shareholders as promoters and to ensure compliance with Regulation 31A.
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