

June 29, 2021

To,
BSE Ltd.
Dept. of Corporate Services
25th Floor, P.J. Towers, Dalal Street,
Mumbai - 400 001

Sub: Annual Secretarial Compliance Report for the financial year ended on 31.03.2021.

Dear Sir,

Pursuant to the SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith Secretarial Compliance Report of the Company for the year ended 31st March, 2021 issued by Shri Bhairav H. Shukla, Practicing Company Secretary, Surat.

Kindly take the same on your record.

Thanking You.

Yours faithfully,
For Shahlon Silk Industries Limited



Hitesh Garmora
Company Secretary

Encl.: As above

SECRETARIAL COMPLIANCE REPORT OF SHAHLON SILK INDUSTRIES LIMITED**FOR THE FINANCIAL YEAR ENDED 31.03.2021**

To,
SHAHLON SILK INDUSTRIES LIMITED
CIN: L17120GJ2008PLC053464
91, G.I.D.C., KHATODARA,
BEHIND - SUB-JAIL,
RING ROAD, SURAT - 395002, GUJARAT, INDIA

I, **BHAIRAV H. SHUKLA**, Practising Company Secretary (CP - 5820) having office at 105-106 Jolly Plaza, Besides G P College, Athwagate, Surat - 395001, Gujarat, India have examined:-

- (a) all the documents and records made available to us and explanation provided by **SHAHLON SILK INDUSTRIES 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 **31/03/2021** ("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 thereunder; 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 THE COMPANY DURING THE AUDIT REVIEW PERIOD)**



105-106, JOLLY PLAZA, BESIDE G. P. COLLEGE,
ATHWAGATE, SURAT - 395 001. (GUJARAT.)
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SECRETARIAL COMPLIANCE REPORT OF SHAHLON SILK INDUSTRIES LIMITED - 31/03/2021 mail.com

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(NOT APPLICABLE TO THE COMPANY DURING THE REVIEW PERIOD)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(NOT APPLICABLE TO THE COMPANY 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 TO THE COMPANY DURING THE AUDIT PERIOD)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) and circulars/ guidelines 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, **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
None			

- (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/our 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.	Obeservation(s) / Remarks of the Practicing Company Secretary, if any
None				



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

01.	Observations of the Practicing Company Secretary in the previous reports	<p>It was observed and reported that Security and Exchange Board of India (SEBI) has taken action and issued warning letter No. CFD / DILII / OW / 27159 / 2019 dated 15.10.2019 for the violation of the Circular, the details of which mentioned here-in-under.</p> <p><i>The company has not completed the formalities for commencing trading within 60 days of receipt of Hon'ble NCLT order, thereby, leading to non-compliance with SEBI Circular dated November 30, 2015 read with Circular No. CFD / DIL3 / CIR / 2018 / 2 dated January 03, 2018.</i></p> <p><i>It was mentioned in the letter that the above-mentioned has been viewed seriously and the company was warned and advised to be careful in future.</i></p> <p><i>It was also advised to place the matter before the Board of Directors of the Company and also to bring to the notice of shareholders.</i></p>
02.	Observations made in the secretarial compliance report for the year ended0	Observations made in the secretarial compliance report for the year ended 31.03.2020.
03.	Actions taken by the listed entity, if any	<p>As directed by the SEBI, the company has taken following steps to comply with the direction of the SEBI -</p> <ol style="list-style-type: none"> 1. The letter was placed before the Board of Directors of the Company at their Board Meeting held on 24th October, 2019 for their perusal. 2. The company has also placed the letter on its web-site www.shahlon.com (Investor Desk / Scheme of Arrangement) for bringing the notice to the shareholders of the Company.



04.	Comments of the Practicing Company Secretary on the actions taken by the listed entity	The company has taken the steps to comply with the direction of the SEBI; the details of which mentioned here-above.
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Place: Surat
Date: 26th June, 2021



A handwritten signature in black ink, appearing to be "Bhairav H. Shukla".

Bhairav H. Shukla
Practising Company Secretary
FCS No. 6212
CP No. 5820
UDIN: F006212C000521531