



To,
The SHUKRA JEWELLERY LIMITED
Ahmedabad

**SECRETARIAL COMPLIANCE REPORT OF SHUKRA JEWELLERY
LIMITED FOR THE YEAR ENDED ON 31.03.2021**

I/We have examined:

- (a) all the documents and records made available to us and explanation provided by THE SHUKRA JEWELLERY 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 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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;



(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
and circulars/ guidelines issued thereunder;

and based on the above examination, I/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: -

S. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	<i>Regulation 13(3)</i>	Grievance Redressal Mechanism	<i>*company has late filed dated 28.01.2021 for the quarter ended 31.12.2020.</i>
2	<i>Regulation 27(2)</i>	Corporate Governance Report	<i>*company has late filed dated 25.01.2021 for the quarter ended 31.12.2020.</i>
3	<i>Regulation 31</i>	Holding of specified securities and shareholding pattern	<i>*company has late filed dated the quarter ended 30.06.2020, 30.09.2020 31.12.2020.</i>
4	<i>SEBI (Prohibition of Insider Trading) Regulations, 2015,</i>	Trading window closure	<i>Late intimation for the quarter end on 30th June 2020</i>

In our opinion and to the best of our information and according to the explanations given to us the Company has complied with the conditions of SEBI (LODR) Regulations 2015 and the guidelines or directives issued by the relevant authorities and subject to what is stated above, we certify that



Company has complied with the conditions, as stipulated in the above-mentioned Listing Regulations.

(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.

(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 thereunder:

S. 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	STOCK EXCHANGE	Regulation 13(3)	*As under	BSE reply is awaited
2	STOCK EXCHANGE	Regulation 27(2)	*As under	BSE reply is awaited
3	STOCK EXCHANGE	Regulation 31	*As under	BSE reply is awaited
4	STOCK EXCHANGE	Regulation 17(1)	*As under	BSE reply is awaited
5	STOCK EXCHANGE	Regulation 18(1)	*As under	BSE reply is awaited
6	STOCK EXCHANGE	Regulation 19(1)/19(2)	*As under	BSE reply is awaited
7	STOCK EXCHANGE	Regulation 20(2)/(2A)	*As under	BSE reply is awaited

Further, pursuant to BSE email dated 05th March 2021, BSE Ltd had imposed penalty of total Rs. 12,94,460/- for quarter ended 31.12.2020 for non-compliance of SEBI (LODR) Regulations, 2015 i.e. Rs. 8,260/- for Regulation 13(3), Rs. 82,600/- for Regulation 27(2), Rs. 9,440/- for Regulation 31, Rs. 5,42,800/- for Regulation 17(1), Rs. 2,17,120/- for Regulation 18(1), Rs. 2,17,120/- for Regulation 19(1)/19(2). Rs.



2,17,120/- for Regulation 20(2)/(2A).

**Company has made communication with respect to aforementioned violations and sought exemption pursuant to Proviso of Regulation 15(2) (b) and in response to those communication company has not received any reply from BSE.*

Till date reply of BSE is awaited



Kishor S. Dudhatra
Practising Company Secretary
FCS No.: F7236
C P No.: 3959

UDIN: F007236C000553298

Place: Ahmedabad
Date: 30.06.2021