



**ANNUAL SECRETARIAL COMPLIANCE REPORT  
OF  
SHRADHA AI TECHNOLOGIES LIMITED  
(FORMERLY KNOWN AS SHRADHA INDUSTRIES LIMITED)  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2025  
(Pursuant to SEBI- CIR/CFD/CMD/1/27/2019 Dated February 08, 2019)**

To,  
**The Board of Directors  
Shradha AI Technologies Limited  
(Formerly known as Shradha Industries Limited)**  
CIN: L51227MH1990PLC054825  
Address: 1<sup>st</sup> floor, 345, Shradha House,  
Kingsway Road, Nagpur - 440001,  
Maharashtra, India

I CS Riddhita Agrawal, Practicing Company Secretary (FCS No. 10054, Certificate of Practice No. 12917 and Peer Review Certificate No.12917) have examined:

- (a) all the documents and records made available to us and explanation provided by M/s **SHRADHA AI TECHNOLOGIES LIMITED [Formerly known as Shradha 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 Report,

for the Financial year ended 31.03.2025 ("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 SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;





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**Contact:** +91-9096962064 | **Email id:** csriddhita17@gmail.com

- (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:-





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

| Sr. No. | Observation/ Remark of the Practicing Company Secretary in the previous reports) (PCS)                                                                 | Observations Made in the secretarial compliance Report (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       | <u>Financial Year ended 31/03/2024:</u><br>The Company has paid the fine/penalty imposed on 26 <sup>th</sup> February 2024 to BSE & MSEI respectively. | Non-Compliance with the requirements pertaining to composition of Stakeholders Relationship Committee (absence of a Chairperson for the Stakeholders Relationship Committee for the Quarter ended 31st December, 2023.) | Stakeholders Relationship Committee                                                   | <b>Details of violation</b> - Non-Compliance with the requirements pertaining to composition of Stakeholders Relationship Committee (absence of a Chairperson for the Stakeholders Relationship Committee for the Quarter ended 31st December, 2023.)<br><b>Penalty Imposed-</b> a fine of Rs. 1, 29, 800/- (Incl. of GST) each was | The Company has paid the fine and requested to the Stock Exchanges (BSE and MSEI) vide letter dated 06 <sup>th</sup> march 2024 for Waiver of Fine. | The Company has paid the fine/penalty imposed on 26 <sup>th</sup> February 2024 to BSE & MSEI respectively and filed a Waiver Application with Exchanges BSE and MSEI for Waiver of Fine. However the same has been rejected by the Exchanges vide their Email dated Jun 19, 2024. |





|  |  |  |  |                                                                     |  |  |
|--|--|--|--|---------------------------------------------------------------------|--|--|
|  |  |  |  | levied against<br>the Company<br>by BSE and<br>MSEI<br>respectively |  |  |
|--|--|--|--|---------------------------------------------------------------------|--|--|

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

| Sr.<br>No. | Particulars                                                                                                                                                                                                                                                                                                                                                       | Compliance<br>Status<br>(Yes/No/NA) | Observations/<br>Remarks by PCS |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|---------------------------------|
| 1.         | <b><u>Secretarial Standards:</u></b><br><br>The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI)                                                                                                                                                     | Yes                                 |                                 |
| 2.         | <b><u>Adoption and timely updation of the Policies:</u></b><br><br>• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities<br>• 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<br><br>Yes                      |                                 |
| 3.         | <b><u>Maintenance and disclosures on Website:</u></b><br><br>• The Listed entity is maintaining a functional website i.e. <a href="https://shradhaatechnologies.com/">https://shradhaatechnologies.com/</a><br>• Timely dissemination of the documents/ information under a separate section on the website                                                       | Yes<br><br>Yes                      |                                 |





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**Contact:** +91-9096962064 | **Email id:** csriddhita17@gmail.com

Control of

**RIDDHITA AGRAWAL**  
C.P. No. 12917  
FCS No. 10054  
MUMBAI  
PRC No. 1838/2022  
COMPANY SECRETARY

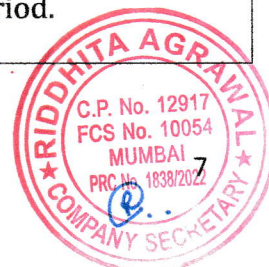


|    |                                                                                                                                                                                                                                                                                                                                                                                |                           |                                  |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|----------------------------------|
|    |                                                                                                                                                                                                                                                                                                                                                                                |                           | Moodscope AI<br>Private Limited. |
| 6. | <b><u>Preservation of Documents:</u></b><br><br>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                       |                                  |
| 7. | <b><u>Performance Evaluation:</u></b><br><br>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                       |                                  |
| 8. | <b><u>Related Party Transactions:</u></b><br><br>a. The listed entity has obtained prior approval of Audit Committee for all Related party transactions<br><br>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<br><br>Not Applicable | No such situation arose          |
| 9. | <b><u>Disclosure of events or information:</u></b><br><br>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                       |                                  |





|     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |                       |                                                           |
|-----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|-----------------------------------------------------------|
| 10. | <b><u>Prohibition of Insider Trading:</u></b><br><br>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015                                                                                                                                                                                                                                                                                                                                                                  | <b>Yes</b>            |                                                           |
| 11. | <b><u>Actions taken by SEBI or Stock Exchange(s) if any:</u></b><br><br>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)<br>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column. | <b>Not Applicable</b> | <b>No such action has taken place.</b>                    |
| 12. | <b><u>Resignation of statutory auditors from the listed entity or its material subsidiaries:</u></b><br><br>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.                                                           | <b>Not Applicable</b> | <b>No such situation arose.</b>                           |
| 13. | <b><u>Additional Non-compliances, if any:</u></b><br><br>No additional non-compliance observed for all SEBI regulation/ circular/ guidance note etc.                                                                                                                                                                                                                                                                                                                                                                                         | <b>Not Applicable</b> | There were no such transactions during the review period. |





**I further report that the listed entity is in compliance with the disclosure requirements of Employee Benefit Scheme Documents in terms of regulations 46(2) (za) of the LODR Regulations. – Not Applicable**

**Assumptions and Limitations 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. My responsibility is to report based upon my examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. I have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

**Signature:**



**Name: CS RIDDHITA AGRAWAL**

**Practicing Company Secretary**

**FCS No.: 10054**

**CP No.: 12917**

**Peer Review Certificate No.: 1838/2022**

**UDIN: F010054G000479622**

**Date: 28/05/2025**

**Place: Mumbai**