

General information about company	
Scrip Code*	530125
NSE Symbol*	NOTLISTED
MSEI Symbol	
ISIN	INE103E01016
Name of the listed entity	Samrat Pharmachem Limited
Date of start of financial year	01-04-2023
Date of end of financial year	31-03-2024
Date of Reporting to Exchange	30-05-2024
Whether any observations reported by the Secretarial Auditor	Yes
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.	Yes
In previous, Any actions taken against the listed entity/its promoters/directors/its material subsidiaries either by SEBI or by stock exchanges (including under the Standard operating procedures issued by SEBI through various circulars).	Yes
Is there any observation made in the previous report	Yes
Name of the Certifying Firm	A. A. Mulla & Associates
Name of the practicing Company Secretary issuing the report	Aqueel A Mulla
Membership Type	FCS
ACS/FCS No.	2973
UDIN	F002973F000495894
CP No.	3237
Place of PCS	Mumbai
PCS Report Date	30-05-2024

Regulations			
Sr No	Regulation	Applicability during the period under review (Yes/No)	Any Observation (Yes/No)
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Yes	Yes
2	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018	Yes	No
3	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	Yes	Yes
4	Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018	No	No
5	Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021	No	No
6	Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021	No	No
7	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	Yes	No

Current Report													
Sr No	Compliance requirement (regulations/circulars/guidelines including specific clauses)	Regulation Name/ SEBI Circular number	Regulation Number/ circular dated	Deviations	Action taken by	Name of Other Regulatory Body	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of other action taken	Details of violation	Fine Amount	Observations/remarks of the practising Company Secretary, if any	Management Response	Remarks
1	SEBI SAST Reg 31(4)	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	31(4)	Non-submission of declaration u/r 31(4) from the promoters of the company for the financial year ended March 31, 2023	Stock Exchange		Clarification		Late submission of Nil encumbrance u/r 31(4) as per email from BSE Limited dated May 10, 2023		Delay of 29 days for nil encumbrance u/r 31(4) of SEBI (SAST) Regulations, 2011	Since the encumbrance was nil as on 31st March, 2023, the promoters did not give any declaration. However, on receipt of clarification from BSE, the promoters provided the declaration as sought u/r 31(4) of SEBI (SAST) Regulations, 2011	The Promoters of the Company provided the declaration and clarification to the exchange - BSE Limited as required u/r 31(4) on May 10, 2023
2	SEBI (LODR) Regulations, 2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33(2)(b)	Standalone Results - Financial Results for the year ended March 2023, not signed by the chairperson or managing director or a wholetime director or in absence of all other authorised director	Stock Exchange		Clarification		Financial Results for the year ended March 2023 not signed by the authorized signatory as per email from BSE Limited dated June 7, 2023		On close scrutiny, the PDF document of financial results for the year ended March 2023 filed with the exchange - BSE Limited on the online portal bear the digital signature of Mr. Rajesh Mehta (Executive Director) of the company.	The Financial Results for the year ended March 2023 was digitally signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the digital signature of Executive Director of the Company on June 15, 2023
3	SEBI (LODR) Regulations, 2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	31(b)	Discrepancies in Shareholding Pattern for the quarter ended June 30, 2023	Stock Exchange		Clarification		Bodies corporate wrongly shown in Non Institutions (Any Others) in the shareholding pattern for the quarter ended June 30, 2023 as per email from BSE dated July 28, 2023		Bodies corporate wrongly shown in Non Institutions (Any Others), instead of respective category in the shareholding pattern for the quarter ended June 30, 2023	The company rectified the classification of Bodies Corporate & LLP in the shareholding pattern for the quarter ended June 30, 2023 and uploaded the revised shareholding pattern in XBRL through BSE Listing Portal on July 29, 2023	Revised Shareholding Pattern was uploaded on the BSE Listing Portal
4	SEBI (LODR) Regulations, 2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33(2)(b)	Standalone Results - Financial Results for the quarter ended June 2023, not signed by the chairperson or managing director or a wholetime director or in absence of all other authorised director	Stock Exchange		Clarification		Financial Results for the quarter ended June 2023 not signed by the authorized signatory as per email from BSE Limited dated August 31, 2023		On close scrutiny, the PDF document of financial results for the quarter ended June 2023 was physically signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the company.	The Financial Results for the quarter ended June 2023 was physically signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the physical signature of Executive Director of the Company on September 1, 2023

5	SEBI (LODR) Regulations, 2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33(2)(b)	Standalone Results - Financial Results for the quarter ended September 2023, not signed by the chairperson or managing director or a wholetime director or in absence of all other authorised director. If signed by authorised director, Certified copy of resolution passed by BOD to be furnished as per email from BSE Limited Dated December 20, 2023	Stock Exchange		Clarification		Financial Results for the quarter ended September 2023 not signed by the authorized signatory as per email from BSE Limited dated December 20, 2023	On close scrutiny, the PDF document of financial results for the quarter ended September 2023 filed with the exchange - BSE Limited on the online portal bear the physical signature of Mr. Rajesh Mehta (Executive Director) of the company.	The Financial Results for the quarter ended September 2023 was physically signed by the authorised signatory - Mr. Rajesh Mehta (Executive Director) of the Company	The Company provided the relevant proof of document bearing the physical signature of Executive Director of the Company who is the whole-time director of the the company and designated as (Executive Director) on December 21, 2023
6	SEBI (LODR) Regulations, 2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	27(2)	Corporate Governance for the quarter ended September 30, 2023, the Company's Board must have an MD and/or CEO. Clarification on the appointment of key managerial personnel viz. MD/ CEO/ Manager as per the Section 203 (1)(f) of the Companies Act, 2013 required as per communication dated January 23, 2023.	Stock Exchange		Clarification		The category of the Chairperson / MD of the company not mentioned on the Corporate Governance Report for the quarter ended September 2023	The category of the Chairperson who is also the MD of the company was missed out during online filing of the Corporate Governance for the quarter ended 30-September-2023	Due to inadvertence, the category of the Chairperson who is also the MD of the company was missed out during online filing of the Corporate Governance for the quarter ended 30-September-2023 & 31-December-2023. Details of MD were mentioned correctly on the corporate governance for the quarter ended 30-June-2023.	Informed BSE Limited on Jan 23, 2024 on the online portal

Previous Report																
Sr No	Compliance requirement (regulations/circulars/ guidelines including specific clauses)	Regulation Name/ SEBI Circular number*	Regulation Number/ circular dated	Deviations	Actions taken by	Name of Other Regulatory Body	Type of Action (Advisory/Clarification/Fine/Show Cause Notice/ Warning, etc.)	Details of other action taken	Details of violation	Fine Amount	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)	Comments of the practicing company secretary on the actions taken by the listed entity.	Remedial actions, if any, taken by the listed entity	Management Response	Remarks
1	SEBI (LODR)Regulations,2015	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015	34	Nonsubmissionof Annual Report in XBRL modefor the yearended March31, 2022	Stock Exchange		Fine		Late filing of Annual Report in XBRL mode for the year ended March 31, 2022	4720	4 days of delay under Regulation 34 of SEBI (LODR) Regulations, 2015	Observations made for the financial year ended March, 2023	The Company paid the fine imposed by BSE and the Annual Report in XBRL mode was filed on the listing centre.	The Company paid the fine imposed by BSE and the Annual Report in XBRL mode was filed on the listing centre.	The Company paid the fine imposed by BSE and the Annual Report in XBRL mode was filed on the listing centre.	-

Affirmation			
Sr No	Regulation	Compliance status (Yes/No/NA)	Observations /Remarks by PCS*
1	Secretarial Standards: 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	Adoption and timely updation of the Policies		
(a)	All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities	Yes	
(b)	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	
3	Maintenance and disclosures on Website		
(a)	The Listed entity is maintaining a functional website	Yes	
(b)	Timely dissemination of the documents/ information under a separate section on the website	Yes	
(c)	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	
4	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	
5	Details related to Subsidiaries of listed entities: (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as well as other subsidiaries	NA	The company has no material subsidiaries
6	Preservation of Documents: 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	Yes	
7	Performance Evaluation: 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	Related Party Transactions		
(a)	The listed entity has obtained prior approval of Audit Committee for all Related party transactions	NA	No such event occurred
(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	NA	No such event occurred
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations within the time limits prescribed thereunder	Yes	
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015	Yes	
11	Actions taken by SEBI or Stock Exchange(s), if any: 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) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column	Yes	
12	Resignation of statutory auditors from the listed entity or its material subsidiaries: 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(s) 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	NA	No such event occurred