



ATHARV ENTERPRISES LIMITED

Office No. 1 "Yogi Kripa C.H.S.L, D/27", Central Road, Yogi Nagar, Borivali, Mumbai, 400091
Email: atharventerprisesltd@gmail.com CIN: L66110MH1990PLC391158

30.05.2024

To
Department of Corporate Services,
BSE Limited
PJ Towers, Dalal Street,
Mumbai – 400 001

Scrip Code: 530187

Scrip Symbol: ATHARVENT

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2024

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we have enclosed herewith the Annual Secretarial Compliance Report issued by Practising Company Secretaries, Mr. Suhas Bhattbhatt for the year ended March 31, 2024.

You are requested to kindly take note of the same.

Thanking You

Yours faithfully

For Atharv Enterprises Limited

Pramod
Kumar Gadia

Digitally signed by
Pramod Kumar Gadia
Date: 2024.05.30
16:16:17 +05'30'

Pramod Kumar Gadiya
Managing Director
DIN: 02258245



Office Address : 520, Grand K 10, Opp. Honest Restaurant, Nr. Genda Circle, Vadodara - 390007.
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SECRETARIAL COMPLIANCE REPORT OF
ATHARV ENTERPRISES LIMITED
FOR THE FINANCIAL YEAR ENDED 2023-24

I, Suhas Bhattbhatt, Practicing Company Secretary and Proprietor of M/s. S Bhattbhatt & Co have examined:

- (a) all the documents and records made available to us and the explanation provided by **Atharv Enterprises 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 2023-24 ("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 there under, have been examined, includes:-

- 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; **there were no instances pursuant to these regulations, hence not applicable for the period under review.**
- 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; **there were no instances pursuant to these regulations, hence not applicable for the period under review.**
- v. Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **there were no instances pursuant to these regulations, hence not applicable for the period under review.**
- vi. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **there were no instances pursuant to these regulations, hence not applicable for the period under review.**
- vii. Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **there were no instances pursuant to these regulations, hence not applicable for the period under review.**
- viii. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- ix. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

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 in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 14 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Regulation 14 of Section 14	Non-Payment of Annual Listing Fees 2023-24	BSE Ltd	Stage 1 Notice Reminder for Payment of Annual Listing Fees by and Freezing of shareholding of promoter(s) of the Company	The company had not paid Listing Fees for the company for 2023-24	NIL	The Company has received Annual Listing Notice - Stage 1 Reminder for Payment of Annual Listing Fees for FY 2023-24 and Freezing of shareholding of promoter(s) of the Company.	The Company has paid Annual Listing Fees for the FY 2023-24.	-
2.	Regulation 34 of SEBI (LODR) Regulations, 2015	Regulation 34	Non-submission of Annual Report in XBRL Mode for the year	BSE Ltd	Warning notice	The company had not submitted Annual report in XBRL Mode	NIL	The company had received warning notice for non-submission of XBRL portal.	Due to some technical issue the company is unable to upload the same on XBRL portal.	-



		ended March 31, 2023.			of the company for the year ended March 31, 2023.	Annual Report for the year ended March 31, 2023.	The same was intimated with Stock Exchange.
3.	Regulation 33 (1) (d) of SEBI LODR Regulations, 2015	The Statutory Auditor is not holding Peer Review Certificate.	-	-	The Statutory Auditor is not holding Peer Review Certificate.	The Statutory Auditor of the company is not holding Peer Review Certificate issued by the Peer Review Board of Institute of Chartered Accountants of India.	The already applied for Peer Review Certificate.
4.	Regulation 47 of SEBI LODR Regulations, 2015- Publication of advertisement in newspaper for Financial Results, Notice given to shareholders.	Publication of advertisement in newspaper for Financial Results, Notice of AGM, Book Closure and E voting.	-	-	The company has not published advertisement in newspaper.	All the Non-Compliances under regulation 47 of LODR	The Management of the Company assure that they will comply the Requirement of SEBI Reg. 47 of LODR) Reg. 2015 for the upcoming period.



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

Sr. No.	Compliance Requirement (Regulations/circulars/guide-lines including specific clause)	Regulation/Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1.	Regulation 14 of SEBI (LODR) Regulations 2015	Regulation 14	Non-Payment of Annual Listing Fees 2022-23	BSE Ltd	Stage 3 Notice - Reminder for Payment of Annual Listing Fees by and Freezing of shareholding of promoter(s) of the Company	The company has not paid Annual Listing Fees to the Stock Exchange for the year 2022-23 as per requirement of Reg. 14 of SEBI (LODR) Regulations 2015	NIL	The Company has received Stage 3 Notice - Reminder for Payment of Annual Listing Fees for FY 2022-23 and Freezing of shareholding of promoter(s) of the Company.	-	The Company has paid Annual Listing Fees for the FY -2022-23.
2	Regulation 34 of SEBI (LODR) Regulations, 2015	Regulation 34	Non-submission of Annual Report in XBRL Mode for the year ended March 31, 2022.	BSE Ltd	Warning notice	The company had not submitted Annual report of the company for the year ended March 31, 2022.	NIL	The company had received warning notice for non-submission of Annual Report for the year ended March 31, 2022.	-	Due to some technical issue the company is unable to upload the same on XBRL portal. The same was intimated with Stock Exchange.



3.	Regulation 9(1) and (2) of SEBI (PIT) Regulations, 2015	Regulation 9(1) and (2) of SEBI (PIT) Regulations, 2015	Notice received for contra trades	BSE Ltd	Seeking Clarification on the same	It was observed that company's Director Vandana Pramod Gadiya has indulged in contra trades during February 1, 2023 to February 28, 2023.	NIL	The company had received notice for contra trades that was observed by BSE. One Director of the company Vandana Pramod Gadiya has indulged in contra trades during February 1, 2023 to February 28, 2023.	The Company was unaware about the trade as the same was not intimated by the Director to the company. The company will take necessary step after investigation of this matter and will do the need in compliance with SEBI Regulations.
4.	Regulation (1) (d) of SEBI LODR Regulations, 2015	Regulation 33 (1) (d) of SEBI LODR Regulations, 2015	The Statutory Auditor is not holding Peer Review Certificate.	-	-	The Statutory Auditor is not holding Peer Review Certificate.	NIL	The Statutory Auditor of the company is not holding Peer Review Certificate issued by the Peer Review Board of Institute of Chartered Accountants of India.	The Company has requested to the Statutory Auditor to do Peer Review Audit for the Firm and submit the Valid Peer Review Certificate for Verification.
5.	Regulation 47 of SEBI Regulations, 2015- Publication of advertisement in newspaper for Financial Results, Notice	Regulation 47 of SEBI Regulations, 2015- Publication of advertisement in newspaper for Financial Results, Notice	Publication of advertisement in newspaper for Financial Results, Notice of AGM, Book Closure and E voting.	-	-	The company has not published advertisement in newspaper.	NIL	All the Non-Compliances under this regulation 47 under SEBI LODR Regulations are time bound.	The Company will issue financial Results in Newspaper in compliance of Requirement of Reg. 47 of SEBI (LODR) Reg. 2015.



given	to						
shareholders.							

II. Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations/Remarks by PCS*
1.	<p>Compliances with the following conditions while appointing/re-appointing an auditor</p> <p>i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or</p> <p>ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or</p> <p>iii. If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.</p>	Not Applicable	During the review period, there was no event of appointment/re-appointment /resignation of statutory auditors of the listed entity.



2. Other conditions relating to resignation of statutory auditor

	<p>i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non- cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>b. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information/ explanation sought and not provided by the management, as applicable.</p> <p>c. The Audit Committee / Board of Directors, as the case may be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.</p> <p>ii. Disclaimer in case of non-receipt of information: The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.</p>	<p>Not Applicable</p>	<p>During the review period, there was no event of appointment/ resignation of statutory auditors of the listed entity.</p>
		<p>Not Applicable</p>	<p>During the review period, there was no event of appointment/ resignation of statutory auditors of the listed entity.</p>
<p>3.</p>	<p>The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019.</p>	<p>Not Applicable</p>	<p>During the review period, there was no event of appointment/ resignation of statutory auditors of the listed entity.</p>



*Observations/Remarks by PCS are mandatory if the Compliance status is provided as 'No' or 'NA'

III. We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/N/A)	Observations/Remarks by PCS*
1.	<p>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).</p>	Yes	Complied
2.	<p>Adoption and timely updation of the Policies:</p> <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 have been reviewed & updated on time, as per the regulations/circulars/guidelines issued by SEBI 	Yes Yes	Complied
3.	<p>Maintenance and disclosures on Website:</p> <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 Yes Yes	Complied
4.	<p>Disqualification of Director: None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	Yes	None of the Directors are disqualified during the year.



5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries.</p>	Not Applicable	Listed Entity does not have any subsidiary.
6.	<p>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, 2015.</p>	Yes	Complied
7.	<p>Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	Complied
8.	<p>Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.</p>	Yes Not Applicable	Complied
9.	<p>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, 2015 within the time limits prescribed thereunder.</p>	Yes	Complied
10.	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	Yes	Complied
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been 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 except as provided under</p>	NA	



	separate paragraph herein (**).	
12.	Additional Non-compliances, if any:	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 certify 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.

**For S Bhattbhatt & Co
Practicing Company Secretaries**


**Suhas Bhattbhatt
Proprietor**

A.C.S.: 11975 C.P.: 10427

UDIN: A011975F000461050

Peer Review No: 1660/2022

Date: 27.05.2024

Place: Vadodara

