

30<sup>th</sup> May, 2022

To,  
**BSE Limited**  
Department of Corporate Services  
P. J. Towers, Dalal Street,  
Mumbai-400 001,  
Maharashtra

**Sub.: Annual Secretarial Compliance Report for the Financial Year ended 31<sup>st</sup> March, 2022.**

Scrip Code: 540492

Dear Sir/Madam,

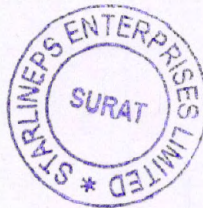
Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019; we are enclosing herewith Annual Secretarial Compliance Report of the Company for the year ended 31st March 2022, issued by Mr. Manish R. Patel, Practicing Company Secretary, Surat.

Kindly take the same on your record and oblige.

Thanking you.

Yours faithfully,  
**For STARLINEPS ENTERPRISES LIMITED**

*Swati Somani*  
**SWATI SOMANI**  
Company Secretary & Compliance Officer  
ACS No.: 68472



Encl.: As above

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STARLINEPS ENTERPRISES LIMITED | CIN : L36910GJ2011PLC065141

Formerly known as 'Starline Precious Stone Limited'

Address : Shop - F/1, 1st floor, Athwa Ark Shopping Centre, Opp. Yatim Khana, Athwa Gate, Surat-395001, Gujarat

0261-2600343 +91-7043999030 info@starlineps.com www.starlineps.com

Mo.: 09426256711

Email : [csmanishpatel@gmail.com](mailto:csmanishpatel@gmail.com)

[mailmanishpatel@yahoo.co.in](mailto:mailmanishpatel@yahoo.co.in)



**MANISH R. PATEL**

Company Secretary & Trade Mark Agent  
M.Com, DTP, DLP, ACS

105, 1<sup>st</sup> Floor, Meghani Tower, Cinema Road, Delhi Gate, Surat – 395 003, Gujarat, Tel: 0261 – 2601717, 3911717

**SECRETARIAL COMPLIANCE REPORT  
OF  
STARLINEPS ENTERPRISES LIMITED  
(CIN: L36910GJ2011PLC065141)  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2022**

I, Manish R. Patel, Practicing Company Secretary, Surat has examined:

- (a) all the documents and records made available to us either physically or by way of email and explanation provided by **STARLINEPS 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 31<sup>st</sup> March, 2022 (“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 (**during the period under review not applicable to the Company**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (**during the period under review not applicable to the Company**);





- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(during the period under review not applicable to the Company);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **(during the period under review not applicable to the Company);**
- (h) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 **(during the period under review not applicable to the Company);**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (k) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2018 **(during the period under review not applicable to the Company);**

and circulars/ guidelines issued thereunder 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 thereunder, 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   |
|---------|---|---|---|
| 1       | SEBI Circular No.: SEBI/HO/CFD/DCR1/CIR/P/2018/85 dated 28 <sup>th</sup> May, 2018:<br>Non submission of information to Designated Depository | Non submission of information in time with Designated Depository. | Pursuant to requirement of System Driven Disclosure Circular, the Company has not submitted requisite information in time to Designated Depository. |

- (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 examination of those records.
- (c) The listed entity has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019 in the terms of appointment of Statutory Auditors of the Company.





- (d) 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:


| Sr. 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. |
|---------|-----------------|----------------------|---|--|
| NONE    |                 |                      |   |  |

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

| Sr. No. | Observations of the Practicing Company Secretary in the previous reports | Observation made in the Secretarial compliance report for the year ended (The years are to be mentioned) | Action taken by the listed entity, if any | Comments of the Practicing Company Secretary on the action taken by the listed entity |
|---------|--|--|---|---|
| *NONE   |  |  |   |   |

*\*This being the first financial year of submitting the Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015 after its applicability, no details are required to be offered in this regard.*



  
**MANISH R. PATEL**  
Company Secretary in Practice  
ACS No.: 19885  
COP No.: 9360

Peer Review No. : 929/2020  
ICSI Unique Code: I2010GJ763400  
UDIN: A019885D000418063

Date: 28/05/2022  
Place: Surat

Note: This report is to be read with our letter of even date which is annexed as 'ANNEXURE A' and forms an integral part of this report.

Mo.: 09426256711

Email : [csmanishpatel@gmail.com](mailto:csmanishpatel@gmail.com)  
[mailmanishpatel@yahoo.co.in](mailto:mailmanishpatel@yahoo.co.in)



**MANISH R. PATEL**

Company Secretary & Trade Mark Agent  
M.Com, DTP, DLP, ACS

105, 1<sup>st</sup> Floor, Meghani Tower, Cinema Road, Delhi Gate, Surat – 395 003, Gujarat, Tel: 0261 – 2601717, 3911717

ANNEXURE - A

To,  
**STARLINEPS ENTERPRISES LIMITED**  
(Formerly known as Starline Precious Stone Limited)  
(CIN: L36910GJ2011PLC065141)  
Shop – F/1, 1st Floor, Athwa Ark Shopping Centre,  
Opp. Yatim Khana, Athwa Gate,  
Surat - 395001

Our report of even date is to be read along with this letter.

1. Maintenance of record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these records based on our audit.
2. We have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. We believe that the processes and practices we followed provide a reasonable basis for our opinion.
3. Wherever required, we have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
4. The compliance of the provisions of SEBI laws, rules, regulations, standards is the responsibility of management. Our examination was limited to the verification of procedures on test basis.
5. As regards the books, papers, forms, reports and returns filed by the Company under these regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the Company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

**MANISH R. PATEL**

Company Secretary in Practice

ACS No.: 19885

COP No.: 9360

Peer Review No. : 929/2020

ICSI Unique Code: I2010GJ763400

UDIN: A019885D000418063



Date: 28/05/2022

Place: Surat