



SIL/JAI/2024-25

# SILGO RETAIL LIMITED

CIN: L36911RJ2016PLC049036

Date: 19.03.2025

Listing Department  
**National Stock Exchange of India Limited**  
"EXCHANGE PLAZA",  
Bandra — Kurla Complex,  
Bandra (East), Mumbai- 400 051 INDIA.

Symbol: SILGO

**Subject:** Management's Comment on Fine Levied by the Exchange

Ref: Notice issued by NSE via email dated 14.02.2025 for non-compliance with Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Dear Sir/ Madam

This is to inform you that the Board of Directors was apprised of Notice dated February 14, 2025, received from the NSE via email on 14<sup>th</sup> February 2025, concerning the notice of non-compliance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 due to delayed in complied with Regulation 31 of Listing Regulations.

The Board Wishes to clarify that this delay was caused by an unforeseen technical issue. Specifically, the Central Depository Services Limited (CDSL) could not generate our Beneficial Ownership (Benpos) due to some technical issues on time. As a result, the information could not visible to our Registrar and Transfer Agent (RTA), causing a delay in processing the shareholding details. Unfortunately, due to this glitch, we received the Benpos data one day later than expected.

Please be assured that we have already addressed this matter with the NSE and have sent them a formal communication via email dated 21-01-2025 to takeover@nse.co.in explaining the situation. It is pertinent to mention here that complying the legal compliances is our utmost priority. We have taken necessary steps to prevent such occurrences in the future and ensure timely compliance with all regulatory requirements.

Notice Received form the exchange has attached hereunder for the reference.

Thanking You,  
Yours Faithfully,  
For SILGO RETAIL LIMITED

TRIPTI SHARMA  
CS & COMPLIANCE OFFICER



## National Stock Exchange Of India Limited

NSE/LIST-SOP/Reg.31/FINES/0195

February 14, 2025

To,  
The Company Secretary  
**Silgo Retail Limited**  
B-11, Mahalaxmi Nagar,  
Jawahar Lal Nehru Marg,  
Jaipur-302017

Dear Sir/Madam,

**Subject: Notice for non-compliance with Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (“Listing Regulations”)**

Your attention is drawn towards SEBI Circular No. SEBI/HO/CFD/PoD2/CIR/P/0155 dated November 11, 2024 (hereinafter referred to as “Master Circular”), specifying Standard Operating Procedure for imposing fines and suspension of trading in case of non-compliance with the Listing Regulations. On verification of the Exchange records, it has been observed that your Company has not complied/delayed complied with Regulation 31 of Listing Regulations. The details of non-compliance(s)/delayed compliance(s), total fine payable by your Company and the particulars about manner in which fine should be remitted to the Exchange is enclosed as **Annexure**.

You are requested to inform the Promoters about identified non-compliance/delayed compliance and to ensure compliance with respective regulation and/or make the payment of fines within 15 days from the date of this notice, failing which the Exchange may initiate following actions as per Master Circular:

1. Initiate freezing of entire shareholding of the Promoters in the Company as well as in other securities held in the Demat account of the Promoters.
2. Trading in securities of your Company shall take place on 'Trade for Trade' basis, in case of consecutive defaults with Regulation 31 of the Listing Regulations i.e., Shifting of trading in securities to Z Category as per Master Circular.

You may also file request for waiver of fines with detailed submission indicating reasons for waiver, considering the extant Policy for Exemption of Fines, and shall indicate whether it intends to seek personal hearing before the concerned Committee.

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Signer: RACHNA JHA  
Date: Fri, Feb 14, 2025 16:00:01 IST  
Location: NSE

**National Stock Exchange Of India Limited**

However, before filing an application for waiver of fines, you are requested to refer to the below policies available on the Exchange's website. For ready reference you may refer below links:

- i. Policy on exemption of fine:**  
[https://archives.nseindia.com/content/equities/Policy\\_for\\_exemption\\_SOP\\_Equity.pdf](https://archives.nseindia.com/content/equities/Policy_for_exemption_SOP_Equity.pdf)
- ii. Policy on processing of waiver application:**  
[https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy\\_on\\_processing\\_of\\_waiver\\_application\\_segregation\\_of\\_commonly\\_listed\\_entities.pdf](https://nsearchives.nseindia.com/web/sites/default/files/inline-files/Policy_on_processing_of_waiver_application_segregation_of_commonly_listed_entities.pdf)

***The request for waiver of fine shall be submitted to the Exchange only through NEAPS portal along with documentary evidence on the below mentioned link (Please note that waiver applications sent via mail will not be considered):***

**NEAPS>>Compliance>>Fine Waiver>>Waiver Request**

Further, as per Master Circular, your Company is also required to ensure that the said non-compliance which has been identified by the Exchange and subsequent action taken by the Exchange in this regard shall be placed before the Board in the next Board Meeting and comments made by the Board shall be duly informed to the Exchange at the below mentioned path in NEAPS portal along with this letter for dissemination having the announcement text as 'Board comments on fine levied by the Exchange'.

**Path: NEAPS > COMPLIANCE > Announcements > Announcements/ CA (Subject: Updates)**

In case of any clarification, you may contact any of the below mentioned Exchange Officers from Listing Compliance Department:

- Ms. Suman Lahoti
- Ms. Madhu Kadam
- Mr. Vinod Nimbalkar
- Ms. Chanchal Daga (Waiver Request)
- Ms. Sweety Mamodia (Waiver Request)

Yours faithfully  
For **National Stock Exchange of India Limited**

**Rachna Jha**  
**Manager**

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**Annexure**

Regulation	Quarter	Fine amount per day (Rs.)	Days of non-compliance	Fine amount (Rs.)
31	31-Dec-2024	2000	1	2000
<b>Total Fine</b>				<b>2000</b>
<b>GST (@18%)</b>				<b>360</b>
<b>Total</b>				<b>2360*</b>

\* In case the Company is non-compliant as on the date of this letter then fine amount will keep on increasing every day till the date of compliance.

**Notes:**

- **If the fine amount is paid before receipt of this letter, then inform the Exchange accordingly.**
- Please update the payment details on below mentioned path:  
NEAPS > Payment > SOP Fine Payment.
- The above payment may be made vide RTGS / NEFT / Net Banking favouring 'National Stock Exchange of India Limited'. The bank details towards the payment of fine are as follows:

BENEFICIARY NAME	NATIONAL STOCK EXCHANGE OF INDIA LIMITED
BANK NAME	IDBI BANK LTD
A/C NO	Please refer Unique Account Code used for making Annual Listing fees to the Exchange
BRANCH	BANDRA KURLA COMPLEX, MUMBAI
RTGS/IFSC CODE	IBKL0001000

- The fine paid as mentioned above will be credited to IPFT as envisaged in the circular.

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