

SASHWAT TECHNOCRATS LIMITED

Regd. Office: Office No.14, First Floor, Plumber House, 557, J. S. S. Road, Chira Bazar, Mumbai – 400002
CIN No.: L24220MH1975PLC018682, E – Mail Id:sashwat.technocrats@gmail.com
Contact No. : 22016021/22016031

Date: 29th June, 2021

To,
Bombay Stock Exchange Limited,
P.J. Towers, Dalal Street,
Mumbai – 400 001

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2021
Scrip Code: 506313

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated August 19, 2020 we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by Mr. Amit Mundra, Practicing Company Secretary.

For **Sashwat Technocrats Limited**



Akshar Jagdish Patel
Company Secretary & Compliance Officer

CS AMIT MUNDRA

Practicing Company Secretary

Office No. 3D, 801, Dheeraj Upvan Building, Sidharth Nagar, Borivali East, Mumbai -400066.
Email id: csamitmundra@gmail.com / M. No 99202 29517

ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021

To,
The Board of Directors,
Sashwat Technocrats Limited
Office No.14, First Floor,
Plumber House, 557, J. S. S. Road,
Chira Bazar,
Mumbai – 400002.

I, Mr. Amit Mundra, have examined:

- all the documents and records made available to us, and explanation provided by **Sashwat Technocrats Limited (CIN: L24220MH1975PLC018682)** (hereinafter referred to as “the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2021 (“Review Period”) in respect of compliance with the provisions of :

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued there under; and
- the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder for the financial year ended 31.03.2021 (“Review Period”), have been examined, include:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and amendments thereof;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



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- 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 (Not applicable to the listed entity during the Review Period);;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable to the listed entity during the Review Period);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable to the listed entity during the Review Period);
- g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable to the listed entity during the Review Period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant Regulation) 1996 & 2018;

and circulars/ guidelines issued thereunder;

The Compliance by the Company of applicable financial laws, like Direct and Indirect tax laws, has not been reviewed in this Audit since the same have been subject to review by statutory financial audit and other designated professionals.

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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 there under, 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.	Regulation 17 (1) (a) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The composition of Board fell short of combination of minimum executive & Non executive directors as prescribed under the said regulation and as per the provisions	There is a Non-Compliance of Regulation 17 (1) (a) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The composition of the Board and its Committees is not as required under the provisions of the Companies Act, 2013 and as also the Listing Agreement and/or the SEBI (LODR) Regulations, 2015.



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		of the Companies Act 2013.	
2	Regulation 18 (3) of the Listing Agreement and/or the SEBI (LODR) Regulations, 2015 and as per the provisions of section 138 read with Rule 13 of the Companies (Accounts) Rules, 2014	Company has not appointed Internal Auditors	<p>There is a Non-Compliance of Regulation 18 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as well as section 138 of the Companies Act 2013.</p> <p>Company has not appointed Internal Auditor as well as not prepared and submitted internal audit report for the FY2020-2021.</p>
3	Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	The Company does not have any operational website.	<p>There is a Non-Compliance of Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.</p> <p>The Company does not have an operational Website, hence not disclosing all or any kind of material information/event/financials/quarterly compliances on the website.</p>
4	Under the provisions of Section 203 (1) of the Companies Act, 2013 as also under the Listing Agreement and/or the SEBI (LODR) Regulations, 2015.	The Company does not have proper composition of the Key Managerial Personnel i.e. Managing Director/Whole Time Director or Chief Executive Officer & Chief Finance Officer in the Company.	There is a non compliance of The Company has not appointed any Key Managerial Personnel i.e. Managing Director/Whole Time Director or Chief Executive Officer & Chief Finance Officer in the Company except Company Secretary who has been appointed on the Board of Directors of the Company.



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(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.

(c) The listed entity does not have any operational website as required under the provisions of the Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.

(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 there under:


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.
1.	NIL	NIL	NIL	NIL

(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	Observations made in the secretarial compliance report for the year ended 31.03.2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA	NA	NA	NA	NA

Date: 29.06.2021

Place: Mumbai


Mem. No. F7933
COP No: 16182
MUMBAI

AMIT MUNDRA
Practicing Company Secretary

FCS No.: F7933

C P No.:16182

UDIN number F007933C000537352

***Disclaimer Note:**

During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on of e verification of scans, soft copies , information, confirmations, records and documents made available to us by the management.


Mem. No. F7933
COP No: 16182
MUMBAI