# **SIL Investments Limited**

CIN No.-L17301RJ1934PLC002761

Registered Office: Pachpahar Road, Bhawani Mandi - 326502 (Rajasthan)
Tel.: (07433) 222082; Fax: (07433) 222916; Mob.: 09769484106
E-mail: investor.grievances@silinvestments.in; Website: www.silinvestments.in

16<sup>th</sup> June, 2020

BSE Ltd.

Phiroze Jeejeebhoy Towers,

Dalal Street, Fort, Mumbai 400 001.

**Scrip Code: 521194** 

National Stock Exchange of India Ltd.

Exchange Plaza,  $5^{\text{th}}$  Floor, Plot No. C/1,

G-Block, Bandra - Kurla Complex, Bandra (E), Mumbai 400 051.

**Scrip Code: SILINV** 

Dear Sirs,

Sub: Submission of Annual Secretarial Compliance Report for the financial year 2019-20

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 08<sup>th</sup> February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of SIL Investments Limited issued by R. Chouhan & Associates, Practicing Company Secretaries, for the financial year 2019 - 20.

You are requested to take the same on record.

Yours faithfully

For SIL Investments Limited

Lokesh Gandhi

Company Secretary and Compliance officer

Encl.: a/a

#### RAJENDRA CHOUHAN B.COM., F.C.S.

### **R.CHOUHAN & ASSOCIATES**

**Practicing Company Secretaries** 

Off: 47, Guru Nanakpura, Raja Park, JAIPUR-302004

Ph.: 0141-2624708, 9314880072

E-Mail: cschouhanr 007@rediffmail.com

To,

The Board of Directors / Members, SIL Investments Limited CIN: L17301RJ1934PLC002761 Pachpahar Road, Bhawanimandi, Jhalawar, Rajasthan.

Secretarial Compliance Report of SIL INVESTMENTS LIMITED (CIN: L17301RJ1934PLC002761) for the year ended on March 31<sup>st</sup>, 2020

I CS Rajendra Chouhan, Company Secretary in Practice have examined:

- (a) all the documents and records made available to us and explanation provided by **SIL INVESTMENTS 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 on March 31st, 2020 ("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; (Not Applicable)

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable)
- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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
	NIL	NIL	NIL

(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.



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(c) 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.
	NIL	NIL	NIL	NIL

(d) 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 <sup>st</sup> March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
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Not applicable as no observation has been made by the Practicing Company Secretary in the previous report for the f.y. ended on 31.03.2019.

Place: JAIPUR

Date: 04.05.2020

UDIN: F005118B000197123

For R. CHOUHAN & ASSOCIATES (ICSI Unique Code: \$2001RJ036300)

RAJENDRA CHOUHAN - PROPREITOR COMPANY SECRETARY IN PRACTICE

FCS No. 5118 C P No.: 3726