



SABRIMALA

सबरी सबके लिए

June 24, 2021

Manager –Listing BSE Limited Phiroze Jeejeebhoy Towers Dalal Street, Mumbai -400 001 Scrip Code: 540132	The Listing Department The Calcutta Stock Exchange Limited 7, Lyons Range Kolkata-700001
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Scrip Code: 540132
ISIN: INE400R01018

Sub: Annual Secretarial Compliance Report For the Year ended March 31, 2021.

Dear Sir/ Madam,

Pursuant to Regulation 24 A of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, read along with SEBI Circular No. CIR/ CFD/CMD 1/27/2019 dated February 8, 2019. We submit herewith the Secretarial Compliance Report for the year ended March 31, 2021, issued by Mr. Loveneet Handa, Practicing Company Secretaries for Year ended March 31, 2021.

This is for your information, records and meeting the compliance requirements as per Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. Hope you shall find the same in order.

Kindly take note of the same.

Thanking You

Yours sincerely,

For SABRIMALA INDUSTRIES INDIA LIMITED

Meenu Sharma
Company Secretary & Compliance Officer.
Membership No: 62251
Place: Delhi

For SABRIMALA INDUSTRIES INDIA LIMITED

Director/Auth. Signatory

Encl.: As above

SABRIMALA INDUSTRIES INDIA LIMITED

(Formerly Known as Sabrimala Leasing and Holdings Limited)

Regd. Office.: 906, 9th Floor, D-Mall, Netaji Subhash Place, Pitampura, New Delhi - 110034

Tel.: 011 - 41754949, Website:www.sabrimala.co.in, E-mail:cs@sabrimala.co.in

CIN:L74110DL1984PLC018467



**Secretarial compliance report of M/s Sabrimala Industries India Limited
for the year ended 31st March, 2021**

I, Loveneet Handa have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Sabrimala Industries India 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 31st March, 2021 ("**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 there under; and
- (b) 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**");

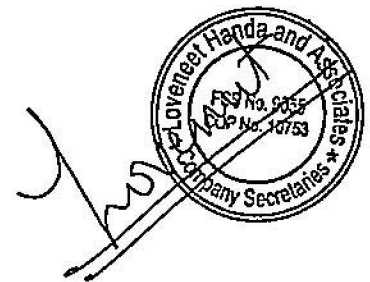
The specific Regulations, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares)



Regulations,2013;
(h) Securities and Exchange Board of India (Prohibition of Insider Trading)Regulations, 2015;
(i)(other regulations as applicable)

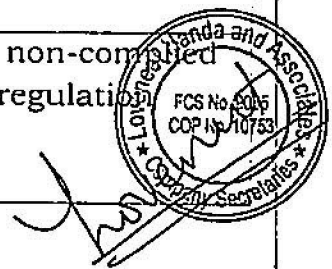
and circulars/ guidelines issued there under; and based on the above examination, I/We hereby report that, during the Review Period:



A handwritten signature in black ink is written over a circular stamp. The stamp contains the text "Loveneer Handa and Associates" around the top edge and "Company Secretaries" around the bottom edge. In the center of the stamp, there are two lines of text: "FSS No. 2055" and "CSP No. 10753".

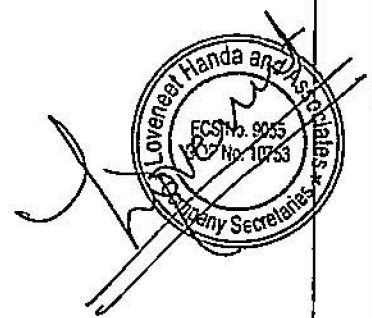
(a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:-

S.No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
FOR THE 1ST QUARTER (1ST APRIL, 2020 TO 30TH JUNE, 2020)			
1	Closure of Trading Window as per the SEBI (Prohibition of Insider trading) Regulations, 2018	Delayed Filed	The company was required to close and file the closure of trading window with BSE as soon as the quarter ends but the company fails to close the trading window and file the same in prescribed time. The company has closed its trading window on 8 th September, 2020 and have filed the same on the same day.
2	Statement of Investor Complaints Regulation 13 of SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015	Delayed Filed	The company was required to file its statement on Investor Complaints within 21 days from end of quarter, but the same is filed after the prescribed time.
3	Shareholding Pattern under Regulation 31 of SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015	Delayed Filed	The company was required to file its statement on Investor Complaints within 21 days from end of quarter, but the same is filed after the prescribed time.
4	Reconciliation of Share Capital Audit Report under Regulation 74 of SEBI (Depositories and Participants) Regulations, 2018	Delayed Filed	The company was required to file its statement on Investor Complaints within 30 days (in PDF and XBRL) from end of quarter, but the same is filed after the prescribed time.
5	Newspaper Advertisement under Regulation 47 of SEBI (Listing Obligations & Disclosure requirement) Regulation, 2015	Non-Filing of the same in English Language	Advertisement was required to be filed in English and Hindi Language; but the company has published the same in Hindi Language only.
6	Newspaper Advertisement for Declaration of Financial Results under Regulation 47 SEBI (Listing Obligations &	Non-Filing	The company has non-complied with the said regulation



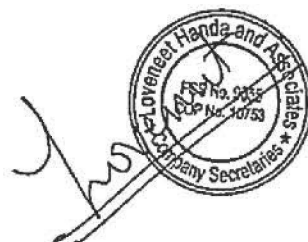
	Disclosure requirement) Regulation, 2015		
FOR 2ND QUARTER (1ST JULY TO 30TH SEPTEMBER, 2020)			
1	Closure of Trading Window	Delayed Filing	<p>The company was required to file the closure of trading window as per the SEBI (Prohibition of Insider trading) Regulations, 2018 as soon as the quarter ends but the company fails to file the same in prescribed time.</p> <p>The company has filed the same on 5th November, 2020 but the trading window was closed for the designated person within the time specified.</p>

(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.

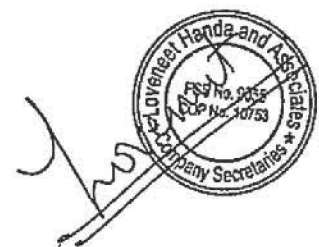


(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

S. 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	BSE	Non- Compliance with requirement to appoint a qualified company secretary as the Compliance Officer	Fine of Rs. 1,07,380 was imposed under Standard Operating Procedure (SOP) Further, on request of the company the said fine is waived off by BSE via mail dated 16 th April, 2021	The company has failed to appoint the Company Secretary as Compliance Officer of the company pursuant to Regulation 6 of SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015 and afterwards has applied for waiver of the fine levied in good faith. On 16 th April 2021, BSE has waived off the said penalty.
2	BSE	Pursuant to Regulation 44 of SEBI (LODR) Regulations, 2015, the Company is required to furnish the details of its voting results in the prescribed format within 48 hours of conclusion of its General Meeting. In this regard, it is observed that the Company has not submitted the Voting Result in XBRL mode as per Exchange Circular number DCS/COMP/20/2016-17 dated January 18, 2017.	No penalty was levied in the mail. It was written that the company need to upload the voting results, failing which can initiate the fine as per the circular.	The company had filled "Voting Result- XBRL " under Regulation 44 regarding our AGM held on 15th December, 2020 on dated "16.12.2020". But it seems that due to some technical glitch the upload was not successful however the other part of document "Scrutinizer Report PDF File" was uploaded successfully on that day. The

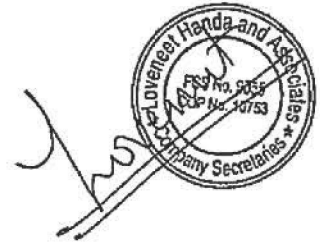


				<p>company have uploaded "Voting Result-XBRL" again on the BSE.</p> <p>Acknowledgement of which was shared with BSE and the same has considered and the fine was not imposed by under the said circular.</p>
3	BSE	<p>The company is non-compliant with the provisions of Regulation 29(2) 29(3) for the Board meeting held on February 14, 2020 (for Financial Results). As mandated in the SEBI SOP circular the company has been intimated about the pending compliance and has also been informed that all the Promoter and promoter Group demat accounts would be frozen if the compliance was not completed and fines paid.</p>	Fine of Rs. 11,800/-	<p>The company tried to submit intimation of board meeting on BSE portal on 5th November, 2020 but due to some technical issue at BSE website the company was not able to receive an OTP on their registered mobile number and email ID, hence the company was not able to login on BSE website on said date</p> <p>However the company have informed BSE by an email by dropping an email to crop.relations@bseindia.co.in on 7-Feb-2020 at 7:52 PM.</p>



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

S. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	The board of directors does not have a proper composition of board in the last quarter of the financial year under review	Secretarial Compliance Report for the financial year 2019-20	-	As per Regulation 15, the company's Net Worth and Paid Up Share Capital does not exceed Rs. 25 Crores and Rs. 10 Crores respectively, Hence, the provisions of Regulation 17 is Not Applicable on the company
2	Appointment of Company Secretary and Compliance Officer	The compliance officer of the company has resigned during the year but no compliance officer was appointed until the end of the year under review.	The company has appointed Compliance officer in terms of Regulation 6 on 12 th August, 2020	Such appointment is beyond 6 Months



Note: The Company in its best practice tries to comply with all the requirements of the SEBI(Listing Obligations & Requirement) Regulations,2015 but due to pandemic situation prevailing in the country and lockdown in the country, the Company was not in the state to comply the requirements in the specified time-line and the same was also explained to BSE/SEBI when the query was raised and the request was accepted for waiver of all penalty levied on the company.

For Loveneet Handa & Associates



Loveneet Handa
Proprietor

M.No: F9055, COP: 10753
UDIN: F009055C000496663

Date: 22.06.2021
Place: Delhi