

SATRA PROPERTIES (INDIA) LIMITED

Regd. Off.: F-27, 1st Floor, Prime Mall, Beside Irla Church, Vile parle (West), Irla road, Mumbai- 400056
Contact No.: 7506599987 E-Mail: info@satraproperties.in

CIN: L65910MH1983PLC030083

Date: 31st July, 2020

To,
Corporate Relation Department
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001
E-mail: corp.relations@bseindia.com

Sub.: Submission of Annual Secretarial Compliance Report for the Financial Year 2019-20 as per SEBI Circular CIR/CFD/CMD1/27/2019 Dated February 8, 2019.

REF: BSE Code No. 508996

Dear Sir,

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, all listed entities are required to submit to the Stock Exchanges Annual Secretarial Compliance Report issued by a practicing Company Secretary based on a check of the compliance by such listed entity with the applicable SEBI Regulations and circulars/guidelines issued thereunder.


Accordingly, we are attaching herewith the Annual Secretarial Compliance Report of Satra Properties (India) Limited issued by D. M. Zaveri & Co., Practicing Company Secretaries, for the Financial Year 2019-20.

Kindly take note of the above on your records and oblige.

Thanking you.

Yours truly,

For Satra Properties (India) Limited


Praful N. Satra
Chairman and Managing Director
DIN: 00053900
Place: Mumbai
Encl.: As above



**Secretarial Compliance Report of Satra Properties (India) Limited
for the Financial year ended 31st March, 2020**

To,
The Satra Properties (India) Limited

F-27, 1st Floor, Prime Mall,
Beside Irla Church, Vile Parle (West), Irla Road
Mumbai - 400056 IN

We, D. M. Zaveri & Co, Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Satra Properties (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, 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;
- (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 during the Review Period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ; **(Not Applicable during the Review Period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable 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 during the Review Period)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;

and based on the above examination, We hereby report that, during the Review Period:

D. M. ZAVERI & Co.

Company Secretaries

DS Dharmesh M. Zaveri
B Com., F.C.S.

145, 1st Floor, Kesar Residency, Above Bagwati Restaurant, Sector 3, Charkop, Kandivali (West), Mumbai – 400 067.
Tel.: 022-28679660, 022-49712722 (M), 98203 20503, E-mail.: dmz@dmzaveri.com, Website: www.dmzaveri.com

- (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 Practising Company Secretary
1.	Regulation 34 & 36(2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.	Delay in submission of Annual Report within the period prescribed under Regulation 34 & 36(2) of the SEBI (LODR), 2015	The Company has submitted copy of annual report with the Stock Exchange on 18-09-2019 after delay of 9 days from the date of dispatch of such report to members i.e. 6 th September 2019. As represented by the management the above non-compliance occurred due to absence of Company Secretary.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records;
- (c) 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 Practising Company Secretary, if any
1.	BSE Ltd.	Delay in submission of Annual Report within the period prescribed under Regulation 34 of the SEBI (LODR), 2015	Levied fine of ₹21,240/- by BSE Ltd.	Upon submission by the Company BSE vide its email dated 07-01-2020 withdrawn fine of ₹21,240/- levied on the Company.

D. M. ZAVERI & Co.

Company Secretaries

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

Sr. No.	Observation of Practising Company Secretary in previous reports	Observation made in the secretarial compliance report for the year ended 31 st March 2019	Action taken by listed entity, if any	Comments of the Practising Company Secretary on the action taken by the listed entity
1.	N. A.	The Company has failed to comply with Regulation 30 to be read with Schedule III Part A (a) (4)(h) w.r.t. filing of Audited Financial Statements of the Company for the year ended 31 st March, 2018, within 30 minutes of the closure of the Board Meeting held on 30 th May, 2018.	NIL	As represented by the Company the above noncompliance is due to technical error.

For D. M. Zaveri & Co.
Company Secretaries

Dharmesh Zaveri
(Proprietor)
FCS. No.: 5418
CP No.: 4363

Place: Mumbai
Date: 31st July 2020

ICSI UDIN: F005418B000537334