

26th May, 2022

<p>The General Manager BSE Ltd. Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001</p>	<p>The Assistant Vice-President The National Stock Exchange of India Ltd. Exchange Plaza, 5th Floor, Plot No.C/1, G Block, Bandra Kurla Complex Bandra (East), Mumbai – 400 051</p>
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Dear Sir,

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March 2022.

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time, and SEBI Circular No. CIR/CFD/CMD1/27/2019 Dated 8th February 2019, we are enclosing herewith the Annual Secretarial Compliance Report duly signed by Practicing Company Secretary for the financial year ended 31st March, 2022.

Kindly find the above in order and take the same on record at the earliest.

Yours faithfully,
For **Sanghi Industries Limited**


Anil Agrawal
Company Secretary



Encl : as above

Sanghi Industries Limited

CIN No. : L18209TG1985PLC005581

Registered Office : P.O. Sanghinagar, Hayatnagar Mandal, R R District, Telangana - 501511.

Tel. : 08415 - 242240 **E-mail** : companysecretary@sanghiment.com

Website : www.sanghiment.com

**SECRETARIAL COMPLIANCE REPORT OF SANGHI INDUSTRIES LIMITED
FOR THE YEAR ENDED ON MARCH 31, 2022**

To,
The Board of Directors
SANGHI INDUSTRIES LIMITED
CIN: L18209TG1985PLC005581
Sanghi Nagar,
Ranga Reddy District,
Telangana - 501511

We, Parikh Dave & Associates, Practicing Company Secretaries, have examined:

- a) all the documents and records made available to us electronically or otherwise and explanation provided by Sanghi Industries 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 31st March, 2022 (“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, to the extent applicable;
- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, **(Not Applicable to the Company during the Review Period)**;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, to the extent applicable;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018, **(Not Applicable to the Company during the Review Period)**;
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (up to 12th August, 2021) and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021 (with effect from 13th August, 2021) **(Not Applicable to the Company during the Review Period)**;

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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (up to 16th August 2021), **(As there is no fresh issue of any Non-Convertible Debt security during the year, the said provisions are not applicable in the reporting year. The debt securities already listed are governed by provision of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015);**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (up to 16th August 2021), **(Not Applicable to the Company during the Review Period);**
- h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021 (with effect from 16th August 2021), **(As there is no fresh issue of any Non-Convertible Debt security during the year, the said provisions are not applicable in the reporting year. The debt securities already listed are governed by provision of The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015);**
- i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; to the extent applicable;
- j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, to the extent applicable- The Company has established In-House electronic connectivity with National Securities Depository Limited (NSDL) & Central Depository Services (India) Limited (CDSL) for Share Transfer Registry Work. All Share Transfer / Demat work are being processed in house by the Company;
- k) The Depositories Act, 1996 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable,

and circulars/ guidelines issued thereunder;

and based on the above examination, we hereby report that during the audit period under review:

- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.
- 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) No action has been taken against the listed entity/ its promoters/ directors 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.

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- d) The listed entity has taken following actions to comply with the observation made by Practicing Company Secretary in the previous report: **Not Applicable**.

Further, the Company has suitably included the conditions as mentioned in Para 6(A) and 6(B) of the SEBI Circular CIR/CFD/CMD1/114/2019, dated October 18, 2019 in the terms of appointment of statutory auditor of the Company.

**FOR PARIKH DAVE & ASSOCIATES
Company Secretaries
ICSI Unique Code No.: P2006GJ009900
Peer review Certificate No.: 796/2020**

UMESH
GOVINDPRASA
D PARIKH

Digitally signed by UMESH GOVINDPRASAD
PARIKH
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serialNumber=67a2c08b65432669edf4bd69810
cdafe367a557a56f167c696c8f405d81106,
cn=UMESH GOVINDPRASAD PARIKH
Date: 2022.05.07 18:06:57 +05'30'

**UMESH PARIKH
PRACTICING COMPANY SECRETARY
PARTNER
FCS No.:4152 C. P. No.: 2413
UDIN: F004152D000286491**

**Place : Ahmedabad
Date : 07-05-2022**