

S. E. POWER LIMITED

CIN : L40106GJ2010PLC091880

PHOENIX

RUBBER REBORN

www.phoenixrubberreborn.com

Date: June 12, 2020

The Manager
Department of Corporate Relationship
BSE Limited
25 P. J. Towers, Dalal Street
Mumbai-400001

The Asstt. Vice President
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex
Bandra (East)
Mumbai-400051

Ref.: Scrip Code: 534598

Scrip Symbol: SEPOWER

Sub.: Annual Secretarial Compliance Report for the year ended March 31, 2020.

Dear Sir,


Please find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2020 under Regulation 24A of the Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019.

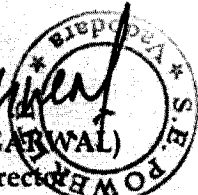
We would appreciate if you could take the above on record.

Thanking You,

Yours Faithfully,

For S. E. Power Limited


(SACHIN AGARWAL)
Managing Director



Encl.: As above

Registered Office & Works

Survey No. 54/B, Pratapnagar, Jarod Savli Road, Samlaya, Vadodara-391520 Gujarat, India.
Phone +91 2667 251566 | E-mail : info@phoenixrubberreborn.com | website : www.sepower.in

**SECRETARIAL COMPLIANCE REPORT OF S. E. POWER LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020**

[Under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no. CIR/CFD/CMDI/27/2019 dated February 8, 2019]

We, Satish Jadon & Associates, Company Secretaries, have examined:

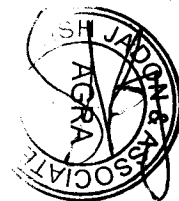
- a) all the documents and records made available to us and explanation provided by S. E. Power Limited ("the listed entity")
- b) the filings/ submissions made by the listed entity to the stock exchanges,
- c) website of the listed entity,
- d) any other document/filing, as may be relevant, which has 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; (Not Applicable to the Company during the Review period)
- 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 Company during the Review period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the Company during the Review period)
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the Company 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 Company during the Review period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Other regulations as applicable



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

- a) The listed entity has complied with the applicable provisions of the above Regulations and circulars/ guidelines issued thereunder.

Sr. No.	Compliance Requirement (Regulations/Circulars/ guidelines including specific clause)	Deviation	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 34 (Filing of Annual Report)	Delay Filing with NSE	The Annual Report for the Financial Year 2018-2019 was delayed filed with NSE
2.	Regulation 13 (3) (Filing of Statement on Investor Complaints)	Delay Filing for Quarter ended 31 st March, 2020 with BSE	The Statement on Investor Complaints was delayed filed with BSE

- 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) 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 actions taken E.g. fines, warning letter, debarment etc.	Observations/ Remarks of the Practicing Company Secretary
1.	NSE	Non Compliance of Regulation 34 of SEBI (LODR) Regulations, 2015	NSE vide its letter dated 15 th October, 2019 has levied a fine amount of Rs. 210040/- inclusive of 18% GST of Rs. 32,040/- for Non Compliance of Regulation 34 of SEBI (LODR) Regulations, 2015 but after communicating with the Company, NSE vide its letter dated 23 rd January, 2020 has reduced the fine from Rs. 210040/- to Rs. 80240/- inclusive of 18% GST of Rs. 12240.	The Annual Report of the Company for the Financial Year 2018-2019 filed by the Company was delayed by 34 days and for such delay Company has deposited the fine to NSE and the letter of NSE has also been placed before the Board of the Company in Board Meeting held on 12 th November, 2019 and the Report of the same was filed by the Company on 4 th December, 2019



2.	BSE	Non Compliance of Regulation 13 (3) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	BSE has levied a fine amount of Rs. 18,880/- inclusive of 18% GST of Rs. 2880/- for Non-Submission of Statement on Investor Complaints for the Quarter ended 31 st March, 2020	The Statement on Investor Complaints for the Quarter ended 31 st March, 2020 was filed with a delay of 16 days. Company has paid fine to BSE on 10 th June, 2020, the communication of BSE should be placed before the Board
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d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations the Practicing Company Secretary	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
Not Applicable during the year under review				

Date: 11.06.2020

Place: Agra



For Satish Jadon & Associates
(Company Secretaries)

(SATISH KUMAR JADON)

Proprietor

Membership No. FCS9512

CP No. 9810

UDIN:F009512B000335167