

SANGHVI MOVERS LIMITED

Regd. Office : Survey No. 92, Tathawade,
Taluka - Mulshi, Pune, Maharashtra - 411 033, INDIA.
Tel. : +91-20-66744700 Fax : +91-20-66744724
E-mail : sanghvi@sanghvicranes.com
Web : www.sanghvicranes.com
CIN No.: L29150PN1989PLCO54143



REF: SML/SEC/SE/19-20/23

Date: 30th May 2019

By Online filing/Courier

Bombay Stock Exchange Limited

Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai- 400001
Kind Attn.: Ms. Pooja Sanghvi - Relationship Manager
Ref: Code No. 530073

National Stock Exchange of India Limited

Exchange Plaza, Bandra Kurla Complex
Bandra East, Mumbai – 400051
Kind Attn.: Mr. K. Hari – Asst. Vice President
Symbol: SANGHVIMOV

Sub: Submission of Secretarial Compliance Report for the year ended 31st March 2019.

Dear Sir/Madam,

Dear Sir,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; Please find enclosed herewith the Annual Secretarial Compliance Report of the Company, for the year ended 31st March 2019, issued by Mr. Vinayak S. Khanvalkar, Partner, Kanj & Co. LLP, Company Secretaries, Pune.

Kindly take the same on record and acknowledge.

Thanks & Regards,

For Sanghvi Movers Limited

Rajesh P. Likhite
Company Secretary &
Chief Compliance Officer



Encl.: As above

Secretarial compliance report of Sanghvi Movers Limited

for the year ended on 31st March, 2019

We have examined:

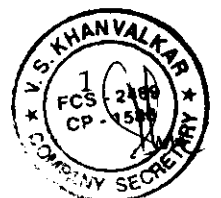
- (a) all the documents and records made available to us and explanation provided by Sanghvi Movers Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended on 31st March, 2019 ("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 to the Listed entity during review period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable to the Listed entity during review period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable to the Listed entity during 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 Listed entity during review period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And (other regulations as applicable) and circulars/ guidelines issued thereunder;



and based on the above examination, we 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
1.	Regulation 17 (1) regarding composition of Board of Directors.	Late Mr. C. P Sanghvi (DIN 00116599) and Mrs. Mina Sanghvi* (DIN 00116748) have been disqualified by Registrar of Companies, Pune/ MCA on account of non-filing of annual returns and financial statements of certain private limited companies in which they were directors	We have been informed that names of Late Mr. Chandrakant Sanghvi and Mrs. Mina Sanghvi are entered erroneously in the list of disqualified directors published by MCA (the list), as both of them had resigned as directors of respective private limited companies prior to 31 st March, 2014 i.e. prior to the commencement of Companies Act, 2013 and their names are appearing in the list due to non-filing of e-form 32 with the Registrar of Companies by the respective private limited companies intimating their resignations. We are also informed that necessary letters were submitted to the Registrar of Companies by the above directors for removal of their names which according to them are erroneously appearing in the list. However, as per the list published by MCA, names of the above-mentioned directors are appearing in the list of disqualified directors. In our view, the composition of Board of Directors is affected due to such disqualification.

- Mrs. Mina C. Sanghvi has resigned from the post of Director of the Company w.e.f. 23rd May 2019.

(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 our examination of those records.

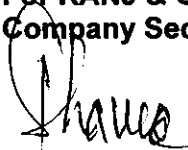
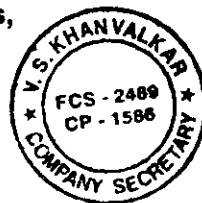
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/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

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
Not Applicable				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable since this is first Report

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For KANJ & Co. LLP,
Company Secretaries,

V. S. Khanvalkar
Partner
FCS: 2489
C P No: 1586

Date: 28/05/2019
Place: Pune