

SHREE GLOBAL TRADEFIN LIMITED

Regd. Off: 35, Ashok Chambers, Broach Street, Devji Ratansey Marg, Masjid, Mumbai – 400 009.
Tel. 022 – 2348 0526 email : sgtl2008@gmail.com CIN : L27100MH1986PLC041252 Website : www.sgtl.in

Date: 29th June, 2021

To,
The Deputy General Manager
Department of Corporate Services
The Bombay Stock Exchange Limited
27th Floor, P.J. Towers, Dalal Street,
Mumbai - 400 001

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended 31/03/2021

With reference to the above subject and in terms of the SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2021.

Kindly take the same on record,

Thanking you,
Yours faithfully,
For Shree Global Tradefin Limited

Viresh Sohoni
Chief Financial Officer



B R Gupta & Co.

Company Secretaries

Office Add.: Unit No. 12, 1st Floor, Poonam Cluster 2, Shanti Park Layout,
Miraroad (E), Thane – 401 107, Maharashtra, India.

Email Id: cs.guptarahul@gmail.com | **Cont. No.:** +91 – 816 919 2320

ANNUAL SECRETARIAL COMPLIANCE REPORT OF M/S. SHREE GLOBAL TRADEFIN LIMITED FOR THE YEAR ENDED 31ST MARCH, 2021

To,
The Board of Directors,
Shree Global Tradefin Limited,
CIN: L27100MH1986PLC041252

I, Rahul Gupta, Company Secretary in Practice, Proprietor of M/s. B R Gupta & Co. have examined:

- all the documents and records made available to us and explanation provided by Shree Global Tradefin Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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;

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not Applicable during the Review Period**
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;-**Not Applicable during the Review Period.**
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;—**Not Applicable during the Review Period.**
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;-**Not Applicable during the Review Period.**
- And such other circulars/guidelines issued and applicable to the Company thereunder.

And based on the above examination, I hereby report that, during the Review Period:



B R Gupta & Co.

Company Secretaries

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- (a) The listed entity has complied with the applicable 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 |
|---------|---|------------|---|
| Nil | | | |

- (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 myexamination 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 action taken E.g. fines, warning letter, debarment, etc | Observations/remarks of the Practicing Company Secretary, if any. |
|---------|-----------------|----------------------|--|---|
| Nil | | | | |

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

| 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, 2020 (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 | None | None | Not Applicable | Not Applicable |

For B R Gupta & Co.
Practicing Company Secretary

Rahul Gupta
Company Secretary
M. No.: 43021 & **COP No.:** 20863
UDIN: A043021C000525833
Place: Thane & **Date:** 28/06/2021

Note - Due to outbreak of **Noval Corona Virus** ("Covid-19") in the Country and in compliance of Government of India orders and restrictions of movement of people, I am doing work from home therefore, signing of this submission is being submitted as Digital Signature.