

SILVEROAK COMMERCIALS LIMITED

CIN - L31504MH1985PLC035916

Regd. Off.: Plot No. F23 & 24, MIDC Satpur, Nashik-422007.

Telephone No. (0253) 6611413

Email Id: silveroakcommercialsltd@gmail.com

Date:29.05.2019

To

BSE India Limited

Corporate Relation Department

First Floor, New Trading Ring, Rotunda Building P.J. Tower

Dalal Street, Mumbai-400 051

Script Code: 512197


Sub: Annual Secretarial Compliance Report of the company for the year ended March 31, 2019

Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019

With reference to the SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, Please find enclosed Annual Secretarial Report signed by the practicing company Secretary for year ended March 31, 2019

Please take the above information on record.

For Silveroak Commercials Limited


Director



ANIRUDDHA DEKHANE & ASSOCIATES

COMPANY SECRETARIES

Secretarial Compliance Report of Silveroak Commercials Ltd for the year ended March 2019

I Aniruddha Dekhane Practicing Company Secretary having office at Office No 216, Pournima Tower, Shankar Seth Road, Next to Petrol Pump, Swargate Pune-411037 have examined:

a) all the documents and records made available to us and explanation provided by Silveroak Commercials Ltd (the listed entity)

b) the filing and submission made by listed entity to the stock exchange,

c) Website of 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 2019 ("Review Period") in respect of compliance with provision of:

a) the securities and exchange Board of India Act 1992 (SEBI Act) and the regulations, Circulars, guidelines issued thereunder: and

b) the securities Contract (Regulation) Act 1956 ("SCRA") rules made thereunder and the regulations Circulars, guidelines issued thereunder by the Securities Exchange Board of India ("SEBI")

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2018;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2017;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.
- (d) The Securities and Exchange Board of India (Share based employee benefits) Regulations, 2014 : There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.
- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.

ANIRUDDHA DEKHANE & ASSOCIATES

COMPANY SECRETARIES

- (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client:
- (g) The Securities and Exchange Board of India (Delisting of Equity Shares) (amendment) regulations 2018: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable. And
- (h) The Securities and Exchange Board of India (Buyback of Securities) (amendment) regulations 2015: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable

And based on the above examination, I hereby report that, during the review period:

- a) The listed entity has complied with provisions of the regulations and circulars/guidelines issued there under except in respect of matters specified below: -

Sr No:	Compliance requirement	Deviations	Observation and Remark by PCS
1	Regulation 6 (1) Non Compliance with requirement to appoint a qualified company secretary as the compliance officer		Not appointed till the date
2.	Non-submission of Initial Disclosure / Confirmation as per SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018		Not submitted till the date.

- b) Silveroak Commercials Limited, the listed entity do have the paid capital less than 10 crore and networth less 25 crores and hence compliance with the corporate Governance provisions as specified in SEBI (LODR) Regulations 17,17A, 18, 19 ,20 ,21 ,22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub regulation (2) of regulation 46 and para C,D and E of Schedule V is not applicable to entity.
- c) The listed entity has maintained proper records under the provisions of the above regulations and circulars/ guidelines made thereunder insofar as it appears from my examination of those records
- d) the following are the details of actions taken against the listed entity / its promoters/ directors / material subsidiaries either by SEBI or by Stock Exchanges

Address: Office No. 216, 2nd Floor, Poornima Tower, Shankar Seth Road, Next to Petrol Pump, Swargate, Pune-411037, Email:csaniruddha@gmail.com

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Sr No:	Action taken by	Details of violation	Observation and Remark by PCS
1.	Bombay Stock Exchange	1000 per day(Computed till quarter ended March 31 st 2019 Total Fine 106200	Not paid by Company and not appointed Qualified Company Secretary

e) 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	Actions taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL	NIL	NIL	NIL	NIL

ANIRUDDHA DEKHANE & ASSOCIATES

COMPANY SECRETARIES



Place: Pune

Date: 29/05/2019

Aniruddha Dekhane

Proprietor,

Aniruddha Dekhane & Associates,

Company Secretaries

ACS No: 29290

C P No.: 10545

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