



SARUP INDUSTRIES LTD.

Date: - 04.09.2021

Ref: - SIL/2021-22/SEC/29

To

General Manager
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400001

Sub: - Submission of SECRETARIAL COMPLIANCE REPORT OF SARUP INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31, 2021

Dear Sir,

Pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 find attached the Secretarial Compliance Report of Sarup Industries Limited for the Year ended March 31, 2021 given by Secretarial Auditor of the Company.

This is for your information and record purpose.

Thanking You
Yours Sincerely

Megha

Megha Gandhi
(Company Secretary cum
Compliance Officer)



SECRETARIAL COMPLIANCE REPORT OF THE SARUP INDUSTRIES LIMITED FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021

We have examined:

- all the documents and records made available to us and explanation provided by Sarup Industries 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 March 31, 2021 ("Review Period") in respect of compliance with the provisions of:

- 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 (Issue of Capital and Disclosure Requirements) Regulations, 2015; (Not applicable on the Company for the Review Period)
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018; (Not applicable on the Company for the Review Period)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable on the Company for the Review Period)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not applicable on the Company for the Review Period)
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable on the Company for the Review Period)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client; (To the extent applicable to the Company)
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars/ guidelines issued thereunder;

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



Jalandhar Office:

Raj Chambers, 5-6 Hind Samachar
Street, Jalandhar-144001

Delhi Office:

63/12 First Floor, Main Rama Road,
Kirti Nagar, New Delhi-110015





Dinesh Gupta & Co.

GSTIN: 03AAHFD7181N1Z5

Company Secretaries

Phone: 0181-2280315 | E-mail: dinesh.gupta@dsblawgroup.com | www.dgclaw.in



YEARS of
Conviction &
Commitment

- (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) There was no action taken against the listed entity/ its promoters/ directors either by SEBI or by Stock Exchange (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

S.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, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company has not paid the listing fees within the prescribed time period specified by the recognized stock exchange and a notice in this regard vide notice no. 20191203-31 has been served to the company by Bombay Stock Exchange on December 03, 2019	March 31, 2020	Due to financial reasons of the Company, the Company paid BSE listing fees for the financial year 2019-2020 on November 28, 2019.	The Company has complied with the same.

For Dinesh Gupta & Co.
Company Secretaries


Dinesh Gupta
 Partner
 M. No. F3462, COP No. 1947
 UDIN: F003462C000836921



Date: August 26, 2021
Place: Jalandhar

Jalandhar Office:

Raj Chambers, 5-6 Hind Samachar Street, Jalandhar-144001

Delhi Office:

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