



**SUPRA PACIFIC
MANAGEMENT CONSULTANCY LIMITED**

CIN: L74140MH1986PLC039547

Regd. Office: 1/203, Vishal complex, Narsing lane, Off S. V. Road, Malad (West), Mumbai - 400064

SPMCL/2020

Date: 29.07.2020

To Listing Department
BSE Limited
Phiroze Jeeheebhoy Towers,
Dalal Street, Mumbai-400001

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2020
Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations,
2015

Dear Sir,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 and read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February, 8, 2019, please find enclosed the Annual Secretarial Compliance Report for the year ended 31st March, 2020 issued by the Ms.Nishi Jain, Practicing Company Secretary.

You are requested you to take note the same for your record

Thanking You

Yours Faithfully

For Supra Pacific Management Consultancy Ltd

Dipu George
Company Secretary

NISHI JAIN

Practising Company Secretary

A-102, Krishna Tower, Ashok Nagar, Kandivali E, Mumbai-400101

Cell No. : 9833973382 Email : csnishijain@gmail.com

Annual Secretarial Compliance Report for the year ended 31st March, 2020

The Members,

SUPRA PACIFIC MANAGEMENT CONSULTANCY LIMITED

1-203, Vishal Complex, Narsing Lane,

Off. S.V. Road, Malad (west),

Mumbai - 400 0674.

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Supra Pacific Management Consultancy Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchange,
- (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, 2009;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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: **-No deviations observed**
- (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 my/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: **No violation occurred**
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr No	Observations 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 on the Actions taken by the Company
I.	N.A.	Regulation 10(7) of SEBI (SAST) Regulations, 2011-inter se transfer of more than 25% of shareholding without SEBI approval of exemption of open offer.	The Company sought SEBI approval by filing Condonation of Delay for the same.	The Regulation 10(7) of SEBI (SAST) Regulations, 2011 was duly complied by the Company.

Date: 28/07/2020
Place: Mumbai



Nishi

For Nishi Jain
Practicing Company Secretary

CP No.: 8429
UDIN No.: A022386B000514011