



SUJALA TRADING & HOLDINGS LTD.

Regd. Off. : 1A, GRANT LANE, 2ND FLOOR.ROOM NO-202, KOLKATA-700 012 (West Bengal)
Phone: (91-033) 2236-4330, E-mail:sujala_trading@yahoo.com /enquiry@sujalagroup.com,
CIN-L51109WB1981PLC034381 Website-www.sujalagroup.com

Date: 17.05.2023

To
CRD-LISTING COMPLIANCE,
BSE LIMITED
P.J. TOWER,
DALAL STREET, FORT
MUMBAI- 400001

To
THE LISTING DEPARTMENT
THE CALCUTTA STOCK EXCHANGE LIMITED
7, LYONS RANGE
KOLKATA- 700001

Script Code: 539117 / 29412

Sub: Submission of Compliance Certificate for the Financial year ended on 31stMarch, 2023

Dear Sir,

Please find enclosed herewith the Compliance Certificate for the financial year ended on the 31st March, 2023 and acknowledge the receipt of the same.

This is in compliance and for your record.

Thanking You,
Yours faithfully,

For Sujala Trading & Holdings Limited

SUBHADEEP Digitally signed by
SUBHADEEP MUKHERJEE
MUKHERJEE Date: 2023.05.17
15:49:02 +05'30'

Subhadeep Mukherjee
(Managing Director)
DIN: 03060827



SECRETARIAL COMPLIANCE REPORT
FOR THE FINANCIAL YEAR ENDED 31.03.2023

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019 for the purpose of compliance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To,
The Members
SUJALA TRADING AND HOLDINGS LTD
(CIN: L51109WB1981PLC034381)
1A, Grant Lane, 2nd Floor, Room No. 202,
Kolkata - 700012

Authorized Capital: Rs. 5,80,00,000/-

I have conducted the Secretarial Compliance Audit of the applicable SEBI (Securities and Exchange Board of India) Regulations and the circulars/ guidelines issued thereunder for the Financial Year ended 31st March 2023 for **SUJALA TRADING AND HOLDINGS LTD** ("the listed entity"). The audit was conducted in a manner that provided me a reasonable basis for evaluating the statutory compliances and expressing my opinion thereon.

I **KANCHAN MAHESWARI** have examined:

- (a) all the documents and records made available to me and explanation provided by M/s. Sujala Trading and Holdings Ltd ("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 31.03.2023 ("Review Period") in respect of compliance with the provisions of:

- i. the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- ii. 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) The provisions of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

- b) The provisions of Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 **were not applicable for the review period;**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 including the provisions with regard to disclosures and maintenance of records required under the said Regulations;
- d) The provisions of Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **were not applicable during the review period;**
- e) The provisions of Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **were not applicable for the review period**
- f) The provisions of Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **were not applicable during the review period;**
- g) The provisions of Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 **were not applicable during the review period;**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 including the provisions with regard to disclosure and maintenance of records required under the said Regulations;
- i) The provisions of the Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993;
- j) Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009;
- k) Securities and Exchange Board of India (Depository Participant) Regulations, 2018;
- l) The provisions of Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 **were not applicable during the review period;**

and circulars / guidelines issued thereunder;

I/We hereby report that, during the Review Period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	YES	
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/ guidelines issued by SEBI 	YES	
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Listed entity is maintaining a functional 	YES	

	<p>website</p> <ul style="list-style-type: none"> • Timely dissemination of the documents/ information under a separate section on the website • Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re- directs to the relevant document(s)/ section of the website 		
4.	<p>Disqualification of Director: None of the Director(s) of the Company i s/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	YES	
5.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries</p>	YES	
6.	<p>Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.</p>	YES	
7.	<p>Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	YES	
8.	<p>Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/ rejected by the Audit Committee, in case no prior approval has been obtained.</p>	YES	
9.	<p>Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.</p>	YES	
10.	<p>Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder except as provided under separate paragraph herein (**).</p>	YES	

					NIL					
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Place: Kolkata	Signature : KANCHAN MAHESWARI <small>Digitally signed by KANCHAN MAHESWARI Date: 2023.05.08 16:40:18 +05'30'</small> Name of the Company Secretary : KANCHAN MAHESWARI
Date : 08.05.2023	ACS Number : 55837 CP Number : 20877 PR Number : 2695/2022
UDIN - A055837E000270799	