SAT INDUSTRIES LIMITED

121, B-Wing, 12th Floor, Mittal Tower, Nariman Point, Mumbai - 400 021. (INDIA) Phone : 91 22 6610 7025

Phone : 91 22 6637 2073 Fax : 91 22 6610 7027 Email : sil@mtnl.net.in

Website: www.satgroup.in CIN: L25199MH1984PLC034632



SIL/BSE/2020-21 25-07-2020

The General Manager, Dept. of Corporate Service, BSE Ltd., P.J. Towers, Dalal Street, Mumbai – 400 001.

Scrip code: 511076

Dear Sir/ Madam,

Sub.: Annual Secretarial Compliance Report for the year ended 31st March 2020.

Pursuant to the Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular Ref no. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, enclosed herewith the Annual Secretarial Compliance Report issued by DR. S. K. Jain, Practising Company Secretary, for the year ended 31st March, 2020.

Kindly take the same on your records.

Thanking you,

Yours faithfully,

For Sat Industries Limited

Alka Premkumar Gupta Company Secretary M.No. A35442

Encl.: As above



Secretarial compliance report of Sat Industries Limited for the year ended March 31, 2020

I, Shubhkaran Jain, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by Sat Industries Limited (hereinafter referred to as "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 March 31, 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, 2018;
- (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;

(Not applicable as the Company has not brought back/propose to Buyback any of its securities during the Financial Year under review)

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

(The Company has not introduced any such scheme during the financial year under review)

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)
 Regulations, 2008;
 (The Company has not issued any Debt Securities during the financial
 year under review)
- (g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares)Regulations, 2013; (The Company has not issued any Non- Convertible and Redeemable Preference Shares during the financial year under review)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/guidelines issued thereunder and based on the above examination, I/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:-

| Sr. No | Compliance Requirement (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations/ Remarks ofthe Practicing Company Secretary |
|--------|---|------------|--|
| * | | | - |

- (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 my 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:

| 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. |
|------------|-----------------|-------------------------|--|---|
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(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 (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 |
|------------|--|--|--|--|
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Place: Mumbai Date: 24/07/2020

UDIN: F001473B000491160

For S.K. JAIN & Co.

Dr. S. K. Jain

Practicing Company Secretary

Membership No.1473

COP No. 3076