



SABRIMALA
सबरी सबके लिए

28th May 2022

To, Manager Listing BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai -400001	To, The Listing Department The Calcutta Stock Exchange Limited 7, Lyons Range, Dalhousie, Kolkata, West Bengal-700001
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Scrip Code: 540132
ISIN: INE400R01018

Sub: Submission of Secretarial Compliance Report as per Regulation 24A of SEBI (Listing Obligations and disclosure requirement) Regulations, 2015 for the year ended on 31st March, 2022.

Dear Sir/ Madam,

In compliance with Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 read along with SEBI Circular CIR/CFD/CMD1/27/2079 dated, February 08, 2019, we are submitting herewith Annual Secretarial Compliance Report dated 25th April 2022 issued by Practicing Company Secretary for the Financial Year 2021-22.

You are requested to take the above on your records

Thanking You

Yours sincerely,

For and on behalf of
Sabrimala Industries India Limited

Divya Saluja
Company Secretary & Compliance Officer.
Membership No. A62065



Encl: As above

SABRIMALA INDUSTRIES INDIA LIMITED

(Formerly Known as Sabrimala Leasing and Holdings Limited)

Regd. Office.: 906, 9th Floor, D-Mall, Netaji Subhash Place, Pitampura, New Delhi - 110034

Tel.: 011- 41514958, Website: www.sabrimala.co.in, E-mail: cs@sabrimala.co.in

CIN: L74110DL1984PLC018467



Secretarial compliance report of M/s Sabrimala Industries India Limited for the yearended
31st March, 2022

I, Loveneet Handa proprietor of M/s Loveneet Handa and Associates have examined:

- (a) all the documents and records made available to us and explanation provided by M/s Sabrimala Industries India Limited ("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 31st March, 2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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; **Not applicable**
- (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**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not applicable**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not applicable**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 and circulars/ guidelines issued thereunder

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and based on the above examination and considering the relaxation granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India, I have issued this report to



the spread of the COVID-19 pandemic, 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 of the Practicing Company Secretary
Nil			

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under 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 there under:

S. 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.
NIL				

- (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... (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
1	The company was required to close and file the closure of trading window with BSE as soon as the quarter ends but the company fails to close the trading window and file the same in prescribed	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	After Closure of First Quarter ended on 30.06.2020. The company has closed its trading window on 8 th September, 2020 and have filed the same on the same day same day. After Closure of 2 nd	Such filing is beyond the time period



	time.		Quarter ended on 30.09.2020. The company has filed Closure of trading window on 5 th November, 2020 but the trading window was closed for the designated person within the time specified.	
2.	The company was required to file its statement on Investor Complaints within 21 days from end of quarter, but the same is filed after the prescribed time.	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	Delayed Filed	Such filing is beyond the time period
3	The company was required to file Shareholding Pattern within 21 days from end of quarter, but the same is filed after the prescribed time.	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	Delayed Filed	Such filing is beyond the time period
4	The company was required to submit Reconciliation of Share Capital Audit Report under Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	Delayed Filed	Such filing is beyond the time period



5	Newspaper Advertisement of Notice of the Board Meeting where financial results shall be discussed was required to be filed in English and Hindi Language but the company has published the same in Hindi Language only.	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	Non-Filing of the same in English Language	The company has non-complied with the said regulation
6	Newspaper Advertisement for Declaration of Financial Results under Regulation 47 SEBI (Listing Obligations & Disclosure requirement) Regulation, 2015	No Observations in Secretarial Compliance Report for year ended 31.03.2022 as there is no non-compliance during the year under review	Non-Filing of the same	The company has non-complied with the said regulation

Note: The company in its best practice to comply with all the requirements of the SEBI (Listing Obligations & Disclosure Requirement) Regulations, 2015. There was no non compliance made by the Company during the Review Period

For Loveneet Handa & Associates



Loveneet Handa
Proprietor

M.No: F9055, COP: 10753
UDIN: F009055D000201764

Date: 25/04/2022

Place: Delhi