



SUGAL & DAMANI SHARE BROKERS LTD.,

MEMBER :

National Stock Exchange of India Ltd., Bombay Stock Exchange Ltd.,
Central Depository Services (India) Ltd.,

CIN : L65991TN 1993 PLC 028228

30/06/2021

To
BOMBAY STOCK EXCHANGE LIMITED
THE CORPORATE RELATIONSHIP DEPARTMENT
1ST FLOOR, NEW TRADING WING,
ROTUNDA BUILDING,
PHIROZE JEEJEEBHOY TOWERS
DALAL STREET,
MUMBAI – 400 001

SCRIP CODE: 511654

Dear Sirs,

We enclose We enclose Annual Secretarial Compliance Report for the year ended 31/03/20201 issued by N K Bhansali & Co., Company Secretaries, Chennai.

This is for your records please.

Thanking you,

Yours faithfully,

FOR SUGAL AND DAMANI SHARE BROKERS LIMITED

RADHIKA MAHESHWARI
COMPANY SECRETARY

N.K. BHANSALI & CO.

Crescent Court
963/15, 3rd Floor
Poonamallee High Road
Chennai - 600 084. India

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ANNUAL SECRETARIAL COMPLIANCE REPORT OF SUGAL & DAMANI SHARE BROKERS LIMITED FOR THE YEAR ENDED 31/03/2021

I N.K Bhansali , Practicing Company Secretary , have examined:

- (a) all the documents and records made available to us and explanation provided by SUGAL & DAMANI SHARE BROKERS LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31/03/2021 ("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");

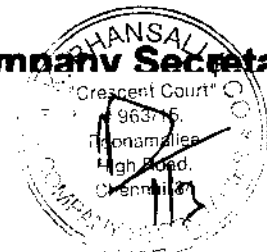
The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (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;
- (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 circulars/ guidelines issued thereunder;

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

A Firm of Company Secretaries



(a) The Listed Entity has complied with the provisions of the Regulations mentioned under clause a) & h) and circulars/guidelines issued there under except

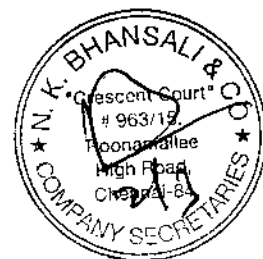
Sr. No	Compliance Requirement (Regulations/ guidelines specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 29(2)/29(3) : prior intimation of meeting of Board of Directors for quarter ended June 2020 and September 2020	Regulation 29(2)/29(3) delay in prior intimation of board meeting	There was a delay intimation of board meeting for June quarter 2020 and September 2020

However In the absence of any transaction in regulations under clause b),c),d),e) ,f) & g) as mentioned above during the review period hence the compliance of the relevant regulations concerning these matters as herein above does not arise.

(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.:

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.
1.	Bombay Stock Exchange	Delay in furnishing prior intimation about the meeting of the board of directors	Imposition of Penalty of Rs.11,800 for each quarter	The Payment of Penalty has been made by Company

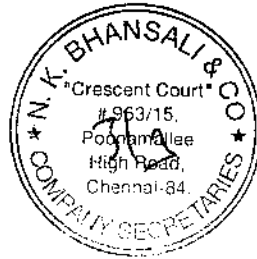


(d) The listed entity has taken the following actions to comply with the observations made in previous reports

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)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
There were no observations in previous report				

(e) The Listed entity has complied with the provisions of SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019, in terms of Para 6(A) and 6(B) of the said circular and has suitably modified the terms of appointment of its Statutory Auditors.

Place : Chennai
Date : 08/06/2021



FOR N K BHANSALI & CO.,
Company Secretaries

(Signature)
(N.K. BHANSALI)
Proprietor

PCS 2321 FCS 3942
UDIN:F003942C000433734

*Disclaimer Note: During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on of e verification of scans, soft copies , information, confirmations, records and documents made available to us by the management