



**SUPRA PACIFIC  
MANAGEMENT CONSULTANCY LIMITED**

CIN: L74140MH1986PLC039547

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

**22<sup>nd</sup> July, 2019**

**To,**  
**The Manager,**  
Corporate Relationship Department,  
BSE Ltd.,  
P. J. Tower, Dalal Street,  
Fort, Mumbai

**Scrip Code: 540168**

**Sub: Annual Secretarial Compliance Report for the financial year ended  
March 31, 2019**

**Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019**

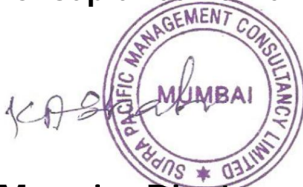
Dear Sir/Madam,

With reference to the SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, please find enclosed Annual Secretarial Compliance Report duly signed by M/S. VKM & Associates, Practicing Company Secretary for the year ended March 31, 2019.

Kindly take the same on your record.

Thanking You,

Your's faithfully,  
**For Supra Pacific Management Consultancy Limited**



**Managing Director  
(Kishor Amichand Shah)  
Din No: 00015575**

VIJAY KUMAR MISHRA

B. Com. (Hons.), A.C.A., F.C.S.

PARESH D PANDYA

B. Com., A.C.S.

**VKM & ASSOCIATES**

**PRACTISING COMPANY SECRETARIES**

116, Trinity Building, 1st Floor, 227, Dr. C. H. Street,  
Behind Parsi Dairy, Marine Lines (E), Mumbai - 2.

Tel. : 2207 7267 ❖ Fax : 2207 7542

Mob.: 93229 77388 ❖ E-mail : vkmassociates@yahoo.com

**Annexure-A**

**Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2019**

To,

**SUPRA PACIFIC MANAGEMENT CONSULTANCY LIMITED**

1-203, Vishal Complex, Narsing Lane,  
Off S. V. Road, Malad (W), Mumbai-400064

We, VKM & Associates, Practicing Company Secretary have examined:

- All the documents and records made available to us and explanation provided by **Supra Pacific Management Consultancy Limited** ("the listed entity"),
- The filings/ submissions made by the listed entity to the stock exchanges,
- Website of the listed entity,
- Any other document/ filing, as may be relevant, which has been relied upon to make this Certification.

**For the year ended 31<sup>st</sup> March, 2019 ("Review Period") in respect of compliance with the provisions of:**

- The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-**

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- 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.

**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**

Sr No	Compliance Requirements (Regulations/Circulars/Guidelines including specific clauses)	Deviations	Observations/Remarks
1.	Regulation 10(7) of SEBI (SAST) Regulations, 2011 - Interse Transfer of shares Between Promoters whilst being an Exclusively listed company on Ahmedabad Stock Exchange at the time of transfer	More than 25% shares Interse transfer without SEBI approval for exemption to make open offer	Submitted the said compliance with SEBI and made Application seeking Condonation for delayed filing and paid applicable fees to SEBI

- 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 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**

Sr No	Action taken by	Details of Violation	Details of Action taken	Comments on the Actions taken by the Company
	.....			



d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**

<i>Sr No</i>	<i>Observations in the previous Reports</i>	<i>Observations made in the Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2018</i>	<i>Actions taken by the Listed Entity; if any</i>	<i>Comments on the Actions taken by the Company</i>
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For VKM & Associates  
Practicing Company Secretary



*Vijay Kumar Mishra*  
(Vijay Kumar Mishra)  
Partner

Date: 30/05/2019  
Place: Mumbai

FCS No. 5023  
C P No.: 4279