

June 22, 2020

Ref: 532509 BSE Limited Department of Corporate Services P. J. Towers, 25 <sup>th</sup> Floor, Dalal Street, Mumbai- 400 001	Ref: SUPRAJIT National Stock Exchange of India Ltd Exchange Plaza, C-1, Block-G, Bandra Kurla Complex, Bandra (E) Mumbai- 400 051
--	---

Dear Sirs,

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

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2020.

Kindly take this into your records.

Thanking you,

Yours faithfully,  
**For SUPRAJIT ENGINEERING LIMITED**



**Medappa Gowda J**  
**CFO & Company Secretary**

Encl: as above

**PARAMESHWAR G. BHAT**

B.Com., LLB, ML, MBA, FCS

Company Secretary

# 496/4, II Floor, 10th Cross  
Near Bashyam Circle, Sadashivanagar,  
Bangalore - 560 080  
Tel : +91 80 23610847  
Telefax : +91 80 41231106  
e-mail : parameshwar@vjkt.in  
parameshwar.g.bhat@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF  
SUPRAJIT ENGINEERING LIMITED  
FOR THE FINANCIAL YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

I, Parameshwar G Bhat, Practising Company Secretary, have examined all the documents and records made available to us and explanation provided by SUPRAJIT ENGINEERING LIMITED (CIN: L29199KA1985PLC006934) ("the Listed Entity"), having its Registered Office at # 100, Bommasandra Industrial Area, Anekal Taluk, Bangalore – 560099, the filings/submissions made by the listed entity to the stock exchanges, website of the listed entity and other document/filing and as may be relevant, which has been relied upon to make this certification for the financial year ended 31st March, 2020 ("1st April, 2019 to 31st March, 2020") 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;
- (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;
- (i) Circulars/Guidelines issued there under;

Based on the above examination, I hereby report that, during the review period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued.
- (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 examination of those records.
- (c) As per the documents provided before me, there were no 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:
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports –

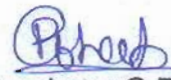
Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial Compliance report for the year ended (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Based on the directions of	31 <sup>st</sup> March,	The Listed	The Listed



	the Listed Entity, the Registrar and Transfer Agent of the Listed Entity has notified the Stock Exchanges of the Loss/Issue of duplicate Share Certificates	2019	Entity has initiated for notifying such events to Stock Exchange as per the regulation 39(3) of the I.ODR, 2015	has complied with and notified Stock Exchanges, the Loss and issue of Duplicate Share Certificates.
--	---	------	---	---

Place: Bengaluru  
Date: 12.06.2020



  
Parameshwar G Bhat  
Company Secretary  
FCS:8860  
CP: 11004  
UDIN: F008860B000336682