



**SECRETARIAL COMPLIANCE REPORT OF M/s. SIBAR AUTO PARTS LTD FOR THE
FINANCIAL YEAR ENDED ON 31st MARCH, 2020**

To
The Members
Sibar Auto Parts Ltd
D4 & D5, Industrial Estate,
Renigunta Road, Tirupati-517506

We, P.S. Rao & Associates, Company Secretaries, have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. Sibar Auto Parts 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 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder 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;
(Not applicable to the Company during the audit period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
(Not applicable to the Company during the audit period)



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the Company during the audit period)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
(Not applicable to the Company during the audit period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
and circulars/ guidelines issued there under and 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 there under
- 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 our examination of those records.
- c. 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 the 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Non-Compliance of Regulation 6(1) of the SEBI (LODR) Regulations, 2015 pertaining to the appointment of qualified company secretary as the compliance officer of the company.	The observation was made for the financial year ended on 31 st March, 2019.	The company has paid the fine as levied by the BSE Limited.	The Company has appointed a company secretary as the compliance officer of the company pursuant to Regulation 6(1) of the SEBI (LODR) Regulations, 2015.



- e. Since the auditor has already been appointed, the terms of appointment of the auditor have been suitably modified to give effect to 6(A) and 6(B) of SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

Place: Hyderabad
Date: 27.07.2020



For **P S Rao & Associates**
Company Secretaries

A handwritten signature in blue ink, appearing to read "M B Suneel".

M B Suneel
Company Secretary
C.P. No.: 14449

UDIN: A031197B000510643