

Date: 15.06.2024

To,

The Manager – Listing National Stock Exchange of India Ltd. Exchange Plaza, Bandra Kurla Complex Bandra East Mumbai – 400051 Symbol - SALASAR	The Secretary Corporate Relationship Dept. BSE Limited P. J. Tower, Dalal Street, Mumbai – 400001 Scrip Code: 540642
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SUB: Submission of Annual Secretarial Compliance Report pursuant to SEBI (LODR) Regulations, 2015 in revised format

Dear Sir/ Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 08, 2019, we enclose herewith a copy of Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2024 in new revised format, issued by M/s Deepika Madhwal & Associates, Practicing Company Secretaries.

You are requested to kindly take the same on record.

Yours faithfully,

For Salasar Techno Engineering Limited

MOHIT
KUMAR
GOEL

Digitally signed by
MOHIT KUMAR GOEL
Date: 2024.06.15
12:59:54 +05'30'

Mohit Kumar Goel
Company Secretary & Compliance Officer

CIN No. - L23201DL2001PLC174076



Unit 1- Khasra 265, 281-283, Parsaun-Dasna, Jindal Nagar, Distt. Hapur-201313
Unit 2- Khasra 1184, 1185, Khera, Pilkhuwa, Tehsil Dhaulana, Distt. Hapur-245304

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Deepika Madhwal & Associates

Practicing Company Secretary

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Email id:- madhwalassociates@gmail.com

Mobile No.:- 981-081-9911

**Annual Secretarial Compliance Report
of
Salasar Techno Engineering Limited
for the year ended 31.03.2024**

To,
Salasar Techno Engineering Limited
E-20, South Extension-I
New Delhi- 110049

I, M/s Deepika Madhwal & Associates have examined:

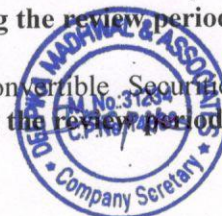
- (a) all the documents and records made available to us and explanation provided by Salasar Techno Engineering Limited ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/filing, as may be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

for the year ended 31.03.2024 ("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 :- **Not Applicable as there was no reportable event during the review period ;**
- (d) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021:- **Not Applicable as there was no reportable event during the review period;**
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **Not Applicable as there was no reportable event during the review period.**



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(g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(h) other regulations as applicable.

and circulars/ guidelines issued thereunder.

and 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 thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
1	The listed entity shall submit to the stock exchanges the disclosures of related party transactions in the format as specified by the Board from time to time and publish the same on website: Provided further that the listed entity shall make such disclosures every six months on the publication of its standalone and consolidated financial results	Regulation 23(9) of SEBI, (LODR) Regulations, 2015	Non-submission of Report within due date.	NSE and BSE	Fine	Regulation 23(9) of SEBI, (LODR) Regulations, 2015	NSE: Rs.11,800/- (10,000/- plus GST @18%) BSE: Rs.11,800/- (10,000/- plus GST @18%)	Fine was imposed upon the listed entity for non-submission of disclosures of related party transactions within due date.	The delay in filing related party transactions disclosure was inadvertent, and the fine has been paid by the company.	The company has paid a fine of Rs.10,000/- for a delay of two days to filing the related party transaction as per regulation 23(9) of SEBI, (LODR) Regulations, 2015



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

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary in the previous reports) (PCS) Observations made in the secretarial compliance report for the year ended 2023	Observations made in the secretarial compliance report for the year ended 2023	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Details of violation / deviations and actions taken / penalty imposed, if any, on the listed entity	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity
NIL	NIL	NIL	NIL	NIL	NIL	NIL

1. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/ No/NA)	Observation s/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	Yes	None
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI. 	Yes	None



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3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">• The listed entity is maintaining a functional website.• Timely dissemination of the documents/ information under a separate section on the website.• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.	Yes	None
4.	Disqualification of Director(s): <p>None of the director(s) of the listed entity are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity</p>	Yes	None
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: <p>a) Identification of material subsidiary companies.</p> <p>b) Disclosure requirement of material as well as other subsidiaries.</p>	Yes	The Company is having one Subsidiary LLP namely M/s Salasar Adorus Infra LLP The Company neither has any Indian nor Foreign Subsidiary Company.
6	Preservation of Documents: <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.</p>	Yes	None
7	Performance Evaluation: <p>The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.</p>	Yes	None



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8	Related Party Transactions: a) The listed entity has obtained prior approval of audit committee for all related party transactions; b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified /rejected by the audit committee.	Yes NA	None No such cases during the review period.
9	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	None
10	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	None
11	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.	NA	The Bombay Stock Exchange (BSE) and the National Stock Exchange (NSE) have imposed a fine of Rs. 10,000/- for a delay of two days in filing the Related Party Transactions (RPT) disclosure as required under Regulation 23(9) of SEBI, (LODR) Regulations, 2015 for the quarter ended September 30, 2023. The Company has duly paid the aforementioned penalty.



12	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	NA	No case of resignation of statutory auditor from the listed entity during the review period.
13	Additional Non-compliances, if any: No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.	NA	No actions were taken by SEBI or Stock Exchanges during the review period

Assumptions & limitation of scope and review:

1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.
4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

For Deepika Madhwal & Associates
Company Secretary Firm

Membership No: 31234
C. P. No. 14808

Place: Ghaziabad
Date: 15/06/2024
UDIN: A031234F000492191
Peer Review Cert. No.: 4217/2023
ICSI Unique Code: S2015UP312000

(Note: This report is issued as per the format of ICSI as updated on May 9, 2024.)