

SAM INDUSTRIES LTD.

CIN: L70102MP1994PLC041416



Registered Office: Village Dakachiya, A. B. Road, Tehsil: Sanwer, District-Indore - 453 771 (M.P.) INDIA
Phone : 0091-731-4229717, Fax : 0091-731-4229724
Website : www.sam-industries.com, email : secretarial@sam-industries.com

29/06/2021

To

The Secretary,
Department of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001.

Dear Sir

Sub. Submission of Annual Secretarial Compliance Report for the financial year ended 31st March, 2021

Ref: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019

BSE Scrip Code 532005

ISIN: INE653D01012

1. Please find enclosed herewith Annual Secretarial Compliance Report pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, received from M. Maheshwari & Associates, Practicing Company Secretaries and Secretarial Auditor of the Company for the financial year ended 31st March, 2021.
2. We request you to take the same on record.

Thanking you.

Yours faithfully,

For Sam Industries Limited

Navin S. Patwa

Company Secretary



**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SAM INDUSTRIES LIMITED FOR
THE YEAR ENDED MARCH 31, 2021**

To
The Board of Directors
SAM INDUSTRIES LIMITED
CIN: L70102MP1994PLC041416
VILLAGE DAKACHIYA, A. B. ROAD. TEHSIL: SANWER,
INDORE MP 453771 IN

Sir/Madam

We, M/s. M. Maheshwari & Associates, Company Secretaries, have examined:

- (a) All the documents and records made available to us and explanation provided by **SAM INDUSTRIES LIMITED** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity www.sam-industries.com.
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2021 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- e) SEBI (Depositories and Participants) Regulations 1996.

The company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms / returns under:

- a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- b) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that, during the Review Period, following are the details:

- 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		N.A.	

- 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 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 there under:

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
		N.A.		



(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 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				

For *M. Maheshwari & Associates*
Company Secretaries
Firms U.C.N. I2001MP213000



Manish Maheshwari
Manish Maheshwari
Proprietor
FCS-5174
CP-3860

Date :28th June 2021
Place : Indore
UDIN :F005174C000532404

Notes: Due to restricted movement amid COVID-19 pandemic, we are providing this secretarial compliance report by examining the Secretarial Records including Minutes, Documents, Registers and other records etc., and some of them received by way of electronic mode from the Company and could not be verified from the original records. The management has confirmed that the records submitted to us are true and correct. This Report is limited to the Statutory Compliances on laws / regulations / guidelines listed in our report of which, the due date has been ended/expired on or before March 31, 2021 pertaining to Financial Year 2020-21.