Industrial Growth Center, Siltara Raipur (CG) 493111, India Tel: +91 771 2216100

Tel: +91 771 2216100 Fax: +91 771 2216198/99 PAN No.: AAACR6149L

CIN: L27100MH1973PLC 016617

www.seml.co.in info@seml.co.in An ISO 9001, ISO 14001 & OHSAS 18001 Certified Company





BSE Ltd The Department of Corporate Services Phiroze Jeejeebhoy Towers Dalal Street - Mumbai 400 001

Security Code No.: 504614

National Stock Exchange of India Ltd. Exchange Plaza, Bandra Kurla Complex Bandra (E), Mumbai – 400051 Fax. No: 022-26598237/38, 022-26598347/48

Symbol: SARDAEN

Series: EQ

Dear Sir,

Sub: Secretarial Compliance Report - F.Y. 2021-22

With reference to the captioned subject, please find enclosed herewith the Secretarial Compliance Report for the F.Y. 2021-22, under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

You are requested to take the same on records.

Thanking you,

Yours faithfully, For Sarda Energy & Minerals Ltd.

Company Secretary

Encl: As above



S.G. KANKANI & ASSOCIATES COMPANY SECRETARIES

SECRETARIAL COMPLIANCE REPORT OF M/S SARDA ENERGY & MINERALS LIMITED FOR THE YEAR ENDED MARCH 31, 2022

TO, M/S SARDA ENERGY & MINERALS LIMITED, CIN: L27100MH1973PLC016617 73-A, CENTRAL AVENUE, NAGPUR (MS) 440018

I Kamlesh Ojha, Partner of M/s S.G. Kankani & Associates, Company Secretaries, Raipur (Chhattisgarh) have examined:

- a) all the documents and records made available to us and explanation provided by M/s Sarda Energy & Minerals Limited (hereinafter referred to as "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 31st March, 2022 ("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 there under 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;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not Applicable to the listed entity during the Review Period)
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not Applicable to the listed entity during the Review Period)

SARDA ENERGY & MINERALS LIMITED - SECRETARIAL COMPLIANCE REPORT- FY 2021-22



S.G. KANKANI & ASSOCIATES COMPANY SECRETARIES

f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (Not Applicable to the listed entity during the Review Period)

g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (Not Applicable to the listed entity during the Review Period)

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

i) Securities and Exchange Board of India (Depositories and Participant) Regulation 2018;

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 there under.
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.
- c) During the previous financial year 2020-21, there was delay of 202 days in appointment of Independent Women Director on the Board of Directors of the Company in pursuance of the provisions of Regulation 17(1)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. With respect to the above non-compliance, BSE Ltd., in August, 2021, had imposed a fine of Rs. 1,12,100/- (including GST), which was duly paid by the Company in August, 2021 itself. Except the above, there are 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 thereunder.

PLACE: RAIPUR (C.G.)

DATE: 30.05.2022

FOR, S.G. KANKANI & ASSOCIATES COMPANY SECRETARIES

FRN: P1998CG012600 PR: 1396/2021

CS KAMLESH OJHA)

PARTNER FCS NO.: 10807

CP NO.: 14660 UDIN: F010807D000425760