



दि स्टेट ट्रेडिंग कार्पोरेशन ऑफ इंडिया लिमिटेड  
(भारत सरकार का उद्यम)  
THE STATE TRADING CORPORATION OF INDIA LTD.  
(A Govt. of India Enterprise)

STC/BS&P/BS/10082/2017-18/STEX

May 28, 2019

Manager-Listing Compliance Department National Stock Exchange of India Limited Exchange Plaza, Bandra – Kurla Complex, Bandra (East), Mumbai – 400051  Scrip Code : STCINDIA - EQ	Manager –Listing Compliance Department BSE Limited 1 <sup>st</sup> Floor, P.J. Towers, Dalal Street Mumbai – 400001  Scrip Code : 512531
--	---

**Sub: Annual Secretarial Compliance Report for the Year ended 31<sup>st</sup> March, 2019**

Dear Sir/Madam,

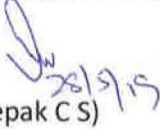
Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8 February 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the year ended 31st March, 2019 issued by M/s. P.C. Jain & Co., Practicing Company Secretaries.

Please take the above on record.

Thanking you,

Yours sincerely,

For The State Trading Corporation of India Limited

  
(Deepak C S)

FCS-5060

Company Secretary & Compliance Officer



To,  
The Members,  
The State Trading Corporation of India Limited  
Jawahar Vyapar Bhawan,  
Tolstoy Marg,  
New Delhi- 110 001

**Subject:-Secretarial Compliance Report of The State Trading Corporation Of India Limited (CIN: L74899DL1956GOI002674) for the year ended 31<sup>st</sup> March 2019 (Pursuant to the Circular No. CIR/CFD/CMD 1/27/2019 Dated 8th Feb 2019 issued by SEBI)**

Dear Sir,

We have examined:

- (a) all the documents and records made available to us and explanation provided by **The State Trading Corporation Of India 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<sup>st</sup> March 2019 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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015
- (b) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992;



**(CORPORATE LAW & INSOLVENCY ADVISOR)**

**Head Office:** 808, Skylark Building, 60, Nehru Place, New Delhi-110019  
Phone: 9811087881, (011) 49874370  
**Branch Office:** 2382, Sector-16, Faridabad-121002, Haryana  
Phone: 9811078338, (0129) 4043338  
**E-mail:** fcspcjain@gmail.com, Website: www.cspcjain.com

- (d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; **(Not applicable during the audit period)**
- (e) The Securities and Exchange Board of India (Share Based employee Benefits) Regulations, 2014; **(Not applicable during the audit period)**
- (f) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable during the audit period)**
- (g) 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 to the extent of Securities issued;
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not applicable during the audit period)**
- (i) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998; **(Not applicable during the audit period)**

and circulars/ guidelines issued thereunder; 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 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
1.	NIL	NIL	NIL

- (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/our 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 thereunder:

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.
1.	NIL	NIL	NIL	NIL

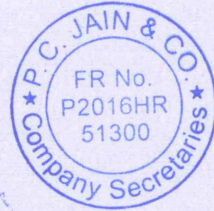


*[Handwritten signature]*

(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 31 <sup>st</sup> March 2018	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	NIL	NIL	NIL	NIL

For P. C. Jain & Co.  
Company Secretaries  
(FRN: P2016HR051300)



A handwritten signature in blue ink, appearing to be "P. C. Jain".

(P C Jain)

Managing Partner  
CP No. 3349

Place: Faridabad

Date: 28/05/2019