

# SAM INDUSTRIES LTD.

CIN: L70102MP1994PLC041416



Works & 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 29/05/2019

To

The Manager,  
Listing & Corporate Service Department  
BSE Limited  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400001

**SCRIP CODE BSE- 532005**

ISIN: INE653D01012

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2018-19  
under Regulation 24A of SEBI (LODR) Regulations, 2015**

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

1. With reference to the captioned subject and in compliance with SEBI circular –CIR/CFD/CMD1/27/2019 dated February 08, 2019 please find Annual Secretarial Compliance Report of the Company issued by Mr. Manish Maheshwari of M. Maheshwari & Associates, Practicing Company Secretaries, for the Financial Year 2018-19 under Regulation 24A of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
2. This is for your information and records.
3. You are requested to please take note of the same and disseminate it in your websites.

Thanking you,

Yours faithfully,

**For Sam Industries Limited**

**Navin S. Patwa  
Company Secretary**



**Encl: as above**

**M. Maheshwari & Associates**  
**Company Secretaries**

Manish Maheshwari  
M.Com, LL.B., F.C.S.

301 Shalimar Corporate Centre,  
8-B, South Tukoganj,  
Indore – 452 001  
P. 0731 4068730  
Cell. 98260 40473  
[mmaheshwarics@gmail.com](mailto:mmaheshwarics@gmail.com)

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**Secretarial compliance report of**  
**SAM INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31, 2019**

I Manish Maheshwari have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s 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,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 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) 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;

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 (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

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
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 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:

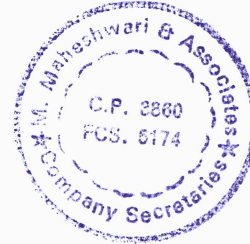
Sr.No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any
NIL				



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
Not Applicable				

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



*Manish Maheshwari*

Manish Maheshwari  
Proprietor  
FCS-5174  
CP-3860

Date : 29.05.2019  
Place : Indore