



EXPORTERS & IMPORTERS

(A GOVERNMENT OF INDIA RECOGNISED TRADING HOUSE)

(AN ISO 9001:2008 CERTIFIED COMPANY)

(CIN : L51909MH2005PLC155765)

301-A, Aarus Chambers, S. S. Amrutwar Lane,
Near Mahindra Tower, Worli, Mumbai - 400 013.

Phone : 2499 9021 / 2499 9022

Fax : 91-22-2499 9032

Website : www.sakumaexportsltd.com

Date: 17th June, 2020

To,
The Manager-Dept. of Corporate Services,
BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400 001
Scrip Code: 531278

To,
Department of Corporate Services,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (E)
Mumbai – 400 051
SYMBOL: SAKUMA

Dear Sir,

Sub: Annual Secretarial Compliance Report under Regulation 24A under SEBI (LODR) Regulations, 2015

Find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended 31st March, 2020 issued by M/s. P. P. Shah & Co., Practicing Company Secretaries.

The same is filed under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with Circular # CIR/CFD/CMD1/27/2019 dated February 8, 2019.

We request you to take the above on your records and oblige.

Thanking you,

Yours faithfully,

For **SAKUMA EXPORTS LIMITED**

SD/-
DHIRAJ KHANDELWAL
COMPANY SECRETARY &
COMPLIANCE OFFICER

Encl: As Above

**SECRETARIAL COMPLIANCE REPORT OF SAKUMA EXPORTS LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2020**

We, M/s. P. P. Shah & Co., Practicing Company Secretaries have examined:

- (a) All the documents and records made available to us and explanation provided by Sakuma Exports 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 31st March, 2020 ("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) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) SEBI (Buyback of Securities) Regulations, 2018;
- (e) SEBI (Share Based Employee Benefits) Regulations, 2014;
- (f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) SEBI (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) SEBI (Prohibition of Insider Trading) Regulations, 2015;
- (i) SEBI (Registrars to an Issue and Share Transfer Agents) Regulations, 1993

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 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.	BSE Ltd.	Non appointment of Company Secretary as Compliance Officer	Fine of Rs. 37,000 + 18% GST for the quarter ended 31 st March, 2019	The Company has paid the fine.
2.	National Stock Exchange of India Limited (NSE)	Non appointment of Company Secretary as Compliance Officer	Fine of Rs. 37,000 + 18% GST for the quarter ended 31 st March, 2019	The Company has paid the fine.
3.	National Stock Exchange of India Limited (NSE)	Change in Promoter Pledge Holding	Clarification required for non-filing of disclosure for change in Promoter Pledge Holding for quarter ended 31 st March, 2019	The Company has filed disclosure for pledge of shares by the Promoter under Reg. 31 of SEBI (SAST) Regulations, 2011.



(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 st March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Non appointment of Company Secretary as Compliance Officer for the quarter ended 31 st December, 2018.	The Company has requested BSE Ltd. to waive the fine but BSE Ltd. has rejected the request.	The Company has paid the fine. The Company has also appointed Mr. Dhiraj Khandelwal as Company Secretary cum Compliance Officer w.e.f. 07 th February, 2019.	The Company has complied with Regulation 6 (1) of SEBI (LODR) Regulations, 2015.
2.	Non appointment of Company Secretary as Compliance Officer for the quarter ended 31 st December, 2018.	The Company has requested NSE to waive the fine but NSE has rejected the request. The Company has paid the fine.	The Company has paid the fine. The Company has also appointed Mr. Dhiraj Khandelwal as Company Secretary cum Compliance Officer w.e.f. 07 th February, 2019.	The Company has complied with Regulation 6 (1) of SEBI (LODR) Regulations, 2015.
3.	Delay in filing Corporate Governance Report for the quarter ended 30 th September, 2018 by 1 day.	The Company has paid the necessary fine for delay in filing Corporate Governance Report for the quarter ended 30 th September, 2018 to National Stock Exchange of India Limited.	Nil, since the Company has already paid the fine.	Nil, since the Company has already paid the fine.



Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
4.	Received letter from Investigation Department of National Stock Exchange of India Limited (NSE) seeking information regarding trading in shares during the period Extra Ordinary General Meeting held on 23 rd October, 2018.	The Company has filed the reply along with the required information on 11 th February, 2019 and the matter is pending with NSE.	The Company has not taken any action since no letter or clarification or reply has been received from NSE.	The Company has not taken any action since no letter or clarification or reply has been received from NSE.
5.	Non intimation of pledge of shares by the Promoter under Reg. 31 of SEBI (SAST) Regulations, 2011.	The Company is in process of filing the same with BSE Ltd. and National Stock Exchange of India Limited.	The Company has filed disclosure for pledge of shares by the Promoter under Reg. 31 of SEBI (SAST) Regulations, 2011.	The Company has filed disclosure for pledge of shares by the Promoter under Reg. 31 of SEBI (SAST) Regulations, 2011.

Place: Mumbai
Date: 17th June, 2020



Signature: Pradip C Shah

Pradip Shah
For P. P. Shah & Co.,
Practicing Company Secretaries
FCS No. 1483, CP No.: 436
UDIN: F001483B000350139