

SPACE INCUBATRICES TECHNOLOGIES LIMITED

Regd. Office: Pawan Puri, Muradnagar, Ghaziabad-201206 (U.P.)

CIN: L17100UP2016PLC084473

E-mail- spaceincubatrices@gmail.com, Web: www.spaceincubatrices.com, Phone: 01232- 261288

Date: 29.06.2021

To,
Dy. General Manager (Listing)
Department of Corporate Services
BSE Limited
PhirozeJeejeebhoy Towers,
Dalal Street, Mumbai-400 001

Scrip Code: 541890

Scrip ID: SPACEINCUBA

Sub: Annual Secretarial Compliance Report under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015.

Dear Sir,

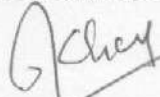
Please find enclosed herewith Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 issued by Mrs. Sonia Rani, Practicing Company Secretary, for the F.Y. ended 31/03/2021.

Please take the same on record.

Thanking You,

Sincerely yours,

For SPACE INCUBATRICES TECHNOLOGIES LIMITED



(Yogesh Kumar Garg)
Company Secretary & Compliance Officer
Membership No- F4738



Encl: as above

SONIA RANI & ASSOCIATES
COMPANY SECRETARIES

**Secretarial Compliance Report of Space Incubiatrics Technologies Limited
For the year ended 31st March, 2021**

I, Sonia Rani, have examined:

(a) all the documents and records made available to us and explanation provided by Space Incubiatrics Technologies Limited (CIN: L17100UP2016PLC084473) ("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, 2021 ("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) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **[Not applicable during the review period]**

(c) 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 during the review period]**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[Not applicable during the review period]**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not applicable during the review period]**



Office Address: F – 200, Gali No. 4, Ganga Vihar, Near Gokal Puri, Delhi – 110094
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Mobile:

SONIA RANI & ASSOCIATES

COMPANY SECRETARIES

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not applicable during the review period]**

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

(i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 - **Not applicable during the review period;**

(j) Securities and Exchange Board of India (Intermediaries) Regulations, 2008 - **Not applicable during the review period;**

(k) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company.

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of the above guidelines issued Regulations and circulars/ thereunder as applicable to the Company.

Sl. 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/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:



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S. No	Action taken by	Detail of violations	Detail of action taken by e.g. Fines, warning letter, debarment	Observation / remarks of the Company Secretary (if any)
1.	SEBI against the directors of Sybly Industries Limited, who are also the directors on the Board of Space Incubatics Technologies Limited.	SEBI has initiated adjudication proceedings under Section 15HA of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as "SEBI Act, 1992") for the alleged violation of the provisions of Section 12A(a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d) and 4(1), 4(2)(f), (k), (r) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations 2003 and under Section 23E of Securities Contracts (Regulation) Act, 1956 (hereinafter referred to as "SCRA, 1956") for the alleged violation of the provisions of Section 21 of SCRA, 1956 read with Clauses 32, 36(7) and 50 of Listing Agreement in the matter of GDR issued by Sybly Industries Limited.	1. Fine/ penalty were imposed on all active directors of the concerned company vide Order No. Order/SRP/AE/2018-19/2397 dated 15th March 2019 2. restrained from accessing the security market and prohibits from buying, selling or otherwise dealing in securities directly or indirectly or being associated with security market in any manner whatsoever for a period of 5 years from the date of order dated 16 th Nov. 2018	The Company has filed an appeal against the said order of SEBI in Securities Appellate Tribunal (SAT) and final outcome of the said appeal is awaited.



SONIA RANI & ASSOCIATES

COMPANY SECRETARIES

(d)The listed entity has taken the following actions to comply with the observations made in previous reports:

S. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2020 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable				

Notes:

1. Maintenance of secretarial records is the responsibility of the management of the company. My responsibility is to express an opinion on these secretarial records based on my audit.
2. Due to the COVID - 19 pandemic and the restrictions faced due to the same, physical verification of documents/ records have been impacted and hence reliance has been placed on the scanned/ soft, copies of various documents / records which were provided by the Company.

For SONIA RANI & ASSOCIATES
Company Secretaries

Sonia Rani

SONIA RANI
(Proprietor)
M. No.: A36984
CP : 20372



29.06.2021

Place: Delhi

Date: June 29, 2021

UDIN: A036984C000536441

Note: This report is to be read with our letter of even date which is annexed as 'ANNEXURE - A' and forms an integral part of this report.

SONIA RANI & ASSOCIATES

COMPANY SECRETARIES

'ANNEXURE - A'

To
The Members,
Space Incubatics Technologies Limited
CIN: L17100UP2016PLC084473
Reg. Office: Pawan Puri, Muradnagar, Dist. Ghaziabad, UP-201206 IN

My report of even date is to be read along with this letter.

1. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express as opinion on these secretarial records based on my audit.
2. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, Corporate and other applicable laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedure on test basis.
6. Due to prevailing COVID-19 countrywide lockdown, record maintained by the Company and various returns filed were supplied to us electronically through e-mail and our examination is based on documents provided and explanations furnished without any physical verification of the records.
7. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For SONIA RANI & ASSOCIATES
Company Secretaries

Sonia Rani

SONIA RANI
(Proprietor)
M. No.: A36984
CP: 20372



29.06.2021

Place: Delhi

Date: June 29, 2021

UDIN: A036984C000536441