



Ushdev International Ltd.

25th June, 2021

To,

BSE Limited

Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report for the year ended March 31, 2021 as per Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("Listing Regulations")

Ref: BSE- **511736**

Pursuant to Regulation 24A of the Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1//27/2019 dated February 8, 2019, please find enclosed the annual secretarial compliance report for the year ended March 31, 2021.

The said disclosure shall also be published on the website of the Company at www.ushdev.com simultaneously.

This is for your information, records and necessary dissemination.

Thanking You.

Yours faithfully,

For **Ushdev International Limited**

Sayli Munj

Company Secretary and Compliance Officer



Encl: As Above

(Ushdev International Limited is under Corporate Insolvency Resolution Process as per the provisions of IBC, 2016. Its affairs, business and assets are being managed by Resolution Professional, Mr. Subodh Kumar Agrawal, appointed as Interim Resolution Professional by NCL T, Mumbai bench by order dated May 14, 2018 and was consequently confirmed as Resolution Professional by the Committee of Creditors.)

CIN: L40102MH1994PLC078468

Registered Office: New Harileela House, 6th Floor, Mint Road, Fort, Mumbai - 400001

Corporate Office: Apeejay House, 6th Floor, 130 Mumbai Samachar Marg, Fort, Mumbai - 400023

Phone: +91-22-61948888 Fax: +91-22-22821098

E-mail: info@ushdev.com Website: www.ushdev.com

SCP & CO.

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF SUMIT WOODS LIMITED FOR THE YEAR ENDED MARCH 31, 2021

***[Under Regulation 24(A) of Securities and Exchange Board of India (Listing
Obligation & Disclosure Requirements) Regulation 2015]***

We **SCP & CO.** have examined:

- a) all the documents and records made available to us and explanation provided by **USHDEV INTERNATIONAL 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, 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 to the Company during the Audit 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 to the Company during the Audit Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories & Participants) Regulation, 2018 (To the extent applicable)

And based on the above examination, we hereby report that, during the Review Period:

Reg. Office: A- 302, Old Ashok Nagar, Vazira Naka, L.T. Road, Borivali west, Mumbai 400091
Branch Office: 26, Gayatri Industrial Estate, Navghar Vasai (E), Palghar- 401210
M.No:7045000841 / E-mail:- corporateissues1991@gmail.com

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Company Secretaries

- A. The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder

Sr.No	Compliance Requirement (Regulations/circulars/ including specific clause)	Deviation	Observations/ Remarks of the Practicing Company Secretary
NOT APPLICABLE			

- 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 Letters, debarment, etc	Observations/ remark of the Practicing Company Secretary
NOT APPLICABLE				

- 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 previous reports	Observations made in the secretarial compliance report for the year ended.... (The years are to be mentioned)	Action taken by the listed entity; if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 24A - Secretarial Compliance Report of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 : The Company has not complied with provision of Regulation 24A of the listing regulations with respect to the submission of Secretarial Compliance Report to the stock exchange within the 60 days from the end of the financial year.	April 01, 2019 to March 31, 2020	The Company has complied with the provision	Complied

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	<i>*Report from Mamta Phatak & Associates (Practicing Company Secretary) issued on April 15, 2019 but company has submitted said report to Bombay Stock Exchange on July 19, 2019</i>			
2	Regulation 31 (1) (b)- Shareholding Pattern of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 : The Company has not complied with the provision of regulation 31(1)(b) of the listing regulations with respect to the submission of Shareholding Pattern for the quarter ended September 30, 2019 to the stock exchange within the 21 days from the end of the quarter i.e till October 21, 2019. The said Shareholding Pattern for the quarter ended September 30, 2019 were submitted by the Company on October 23, 20219	April 01, 2019 to March 31, 2020	The Company has complied with the provision	Complied
3	Regulation 23(9)- Related Party Transaction of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 : Every listed entity shall submit to the stock exchange(s) within 30 days from the date of publication of its standalone and consolidated financial results for the half year, disclosures of related party transactions to the stock exchanges and publish the same on its website. The Company has not given disclosure of Related Party Transaction as per Regulation 23(9) for the quarter ended	April 01, 2019 to March 31, 2020	The Company has not complied with the provision	Not Complied

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	September 30, 2019 to the stock exchange.			
4	Regulation 33 (3) (a) - Financial Results along with Limited review report/Auditor's report of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015: Every listed entity shall submit to stock exchange(s) quarterly and half yearly unaudited financial results along with the limited review report, within 45 days from the end of the quarter	April 01, 2019 to March 31, 2020	The Company has complied with the provision	Complied
5	Regulation 6 (1) Compliance Officer and his Obligations of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015: The Company has not complied with the provision of Regulation 6(1) of the listing regulations with respect to the appointing a qualified company secretary as the compliance office.	April 01, 2019 to March 31, 2020	The Company has complied with the provision	Complied
6	Regulation 27(2)(a) – Corporate Governance Report of the SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015: Corporate Governance Report for the quarter ended September 30, 2019 has been submitted to the stock exchange beyond 15 days from the end of quarter.	April 01, 2019 to March 31, 2020	The Company has complied with the provision	Complied

For SCP & Co

Company Secretaries

Swapnil
Chandrakant Pande
Digitally signed by
Swapnil
Chandrakant Pande
Date: 2021.06.25
14:41:33 +05'30'

Swapnil Pande

M.NO A44893 C.P.No 21962

Place: Mumbai

Date: June 25, 2021

UDIN: A044893C000513669

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