



Ref: D/2022-23/14

Date: 30.05.2022

To,
Listing Department
National Stock Exchange of India Limited
'Exchange Plaza'. C-1, Block G,
Bandra Kurla Complex, Bandra (E),
Mumbai - 400 051
Symbol: SBC

To,
Listing Department
BSE Limited
P.J. Towers, Dalal Street
Mumbai-400001
Scrip Code: 542725

Subject:- Annual Secretarial Compliance Report for the year ended 31st March, 2022.

Dear Sir/Madam,

In terms of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with Clause 3(b)(iii) of SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019, we are enclosing herewith the Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2022, issued by M/S Kumar Mandal & Associates, Practicing Company Secretary.

This is for your information and records.

Thanking You

For SBC Exports Limited.

For SBC Exports Limited


Company Secretary

(Hariom Sharma)
Company Secretary & Compliance Officer
M. No. A41738

CIN: L18100UP2011PLC043209

Corp. Office : 49/95, Site-IV, Sahibabad Industrial Area, Ghaziabad, Uttar Pradesh - 201010

Head Office : House No. 20, Lohiya Talab, Choti Basahi, P.O. Vindhyachal Mirzapur, Uttar Pradesh - 231307

Tel. : 0120-2895246, Customer Care : +8303-300-100, E-mail : info@sbceportslimited.com, Web. : www.sbceportslimited.com



Kumar Mandal & Associates,

Company Secretaries

Office: - D-583, Chittaranjan Park,

New Delhi-110019,

Mobile No: - +91-9873715380, +91-8826602270

E-mail: ashukumar843@gmail.com

Annual Secretarial Compliance Report of M/s SBC Exports Limited
For Financial Year ended 31st March 2022

To,
The Board of Directors
M/s SBC Exports Limited
House No.-20, Lohiya Talab,
Choti Basahi P.O.: Vindhyachal
Mirzapur, U.P.: - 231307

We, M/s Kumar Mandal & Associates, Practicing Company Secretaries, have examined:

- (a) all the documents and records made available to us, and explanation provided by M/s SBC 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 on 31st March 2022 ('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) The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.
- c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- d) The Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018; **(Not Applicable to the Company during the Audit Period)**
- e) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 and The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - **(Not Applicable to the Company during the Audit Period)**





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- f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - **(Not Applicable to the Company during the Audit Period)**
- g) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- h) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act, 2013 and dealing with client.
- i) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; - **(Not applicable to the Company during the Audit Period)**
- j) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; and circulars/ guidelines issued thereunder.

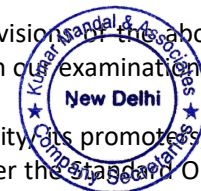
and based on the above examination, we hereby report that, during the Review Period:

- (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:

Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Remarks of the Practicing Company Secretary
Reconciliation of Share Capital Audit as per Regulation 76 of the SEBI (Depositories and Participants) Regulations, 2018 for Quarter ended 31.12.2021.	N.A	The Company could not file Reconciliation of Share Capital Audit Reports on NSE e-portal in time due to technical problem faced by the company while uploading the same. However, the company had filed it later.
Shareholding Pattern as per Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for Quarter ended 31.12.2021.	N.A	The Company could not file Shareholding Pattern on NSE e-portal in time due to technical problem faced by the company while uploading the same. However, the company had filed it later.
Corporate Governance Reports as per Regulation 27 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for Quarter ended 31.12.2021.	N.A	The Company could not file Corporate Governance Reports on NSE e-portal in time due to technical problem faced by the company while uploading the same. However, the company had filed it later.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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 Operating Procedures





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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.	National Stock Exchange of India Limited	The Company could not submit below mentioned documents in time: 1. Reconciliation of Share Capital Audit Reports 2. Shareholding Pattern 3. Corporate Governance Reports	Fine imposed on Company for non-compliance	The Company paid the fine amount in time and the default made good in due course

(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	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
Nil				

Place: New Delhi
Dated: 30.05.2022

For Kumar Mandal & Associates
(Company Secretaries)
ICSI Unique Code: S2016DE419800



Asim Kumar Mandal
(Proprietor)
M. No. 46621
CP No.17039
UDIN: A046621D000422645