## SARASWATI COMMERCIAL (INDIA) LTD.

Regd. Off.: 209 - 210, Arcadia Building, 2nd Floor, 195, Nariman Point, Mumbai - 400 021.

Telephone: 4019 8600 • Fax: 4019 8650 • Email: saraswati.investor@gcvl.in

Website: www.saraswaticommercial.com • CIN: L51909MH1983PLC166605

Date: 12.05.2022

To, Corporate Relationship Department BSE Limited P.J. Towers, 1st Floor, Mumbai - 400 001

Ref: Scrip code: 512020

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

Dear Sir/Madam.

Sub: <u>Annual Secretarial Compliance Report Pursuant to Regulation 24(A) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</u>

With reference to the above, we enclose herewith Annual Secretarial Compliance Report dated 11<sup>th</sup> May, 2022 of Saraswati Commercial (India) Limited duly issued by M/s. Nishant Jawasa & Associates, Practicing Company Secretaries, for the financial year ended March 31, 2022.

Kindly take the same on your record.

Yours faithfully,

For Saraswati Commercial (India) Limited

Avani Sanghavi

**Company Secretary & Compliance Officer** 

Encl: a/a

## Nishant Jawasa & Associates Company Secretaries

A/103 New Ankur CHS Ltd, 32 Bhardawadi Lane, Off. J. P. Road, Andheri (W) Mumbai – 400058. Tel: 022-26781209/ 26771289, Email:njawasa@yahoo.co.in

## SECRETARIAL COMPLIANCE REPORT OF SARASWATI COMMERCIAL (INDIA) LIMITED FOR THE YEAR ENDED 31<sup>st</sup> MARCH, 2022

To,
The Board of Directors,
Saraswati Commercial (India) Limited

- I, Nishant Jawasa, Proprietor of M/s. Nishant Jawasa & Associates have examined:
  - (a) all the documents and records made available to us and explanation provided by Saraswati Commercial (India) 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, 2022 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;
- (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**
- (e)Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable
- (f)Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(i) Other Rules/Regulations and circulars/guidelines issued thereunder applicable to the listed entity –

• Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

And based on the above examination, I 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;
- (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 my examination of those records;
- (c) No actions have been 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;

(d)There were no actions to comply with the observations made in previous reports.

Place: Mumbai

Date: 11th May, 2022

UDIN: F006557D000301225

For Nishant Jawasa & Associates

Company Secretaries

C. P. NO.699

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Nishant Jawasa Proprietor FCS-6557 C.P. No. 6993