



SUGAL & DAMANI SHARE BROKERS LTD.,

MEMBER :

National Stock Exchange of India Ltd., Bombay Stock Exchange Ltd.,
Central Depository Services (India) Ltd.,

CIN : L65991TN 1993 PLC 028228

30/05/2022

To
BOMBAY STOCK EXCHANGE LIMITED
THE CORPORATE RELATIONSHIP DEPARTMENT
1ST FLOOR, NEW TRADING WING,
ROTUNDA BUILDING,
PHIROZE JEEJEEBHOY TOWERS
DALAL STREET,
MUMBAI – 400 001

SCRIP CODE: 511654

Dear Sirs,

We enclose We enclose Annual Secretarial Compliance Report for the year ended 31/03/2022 issued by N K Bhansali & Co., Company Secretaries, Chennai.

This is for your records please.

Thanking you,

Yours faithfully,

FOR SUGAL AND DAMANI SHARE BROKERS LIMITED

RADHIKA MAHESHWARI
COMPANY SECRETARY

N.K. BHANSALI & CO.

Crescent Court
963/15, 3rd Floor
Poonamalee High Road
Chennai - 600 084. India

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SECRETARIAL COMPLIANCE REPORT OF SUGAL & DAMANI SHARE BROKERS LIMITED FOR THE YEAR ENDED 31/03/2022

I N.K Bhansali , Practicing Company Secretary , have examined:

- (a) all the documents and records made available to us and explanation provided by SUGAL & DAMANI SHARE BROKERS LIMITED ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) other document/ filing, as may be relevant, which has been relied upon to make this certification,

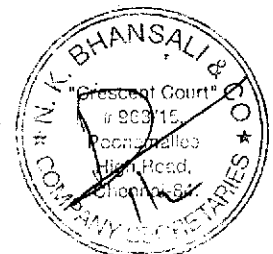
for the year ended 31/03/2022 ("Review Period") in respect of compliance with the provisions of :

- (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) 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and circulars/ guidelines issued thereunder;



A Firm of Company Secretaries

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

(a) The Listed Entity has complied with the provisions of the Regulations mentioned under clause a) & h) and circulars/guidelines issued there under. However in the absence of any transaction in regulations under clause b), c), d), e) ,f) & g) as mentioned above during the review period hence the compliance of the relevant regulations concerning these matters as herein above does not arise.

(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.

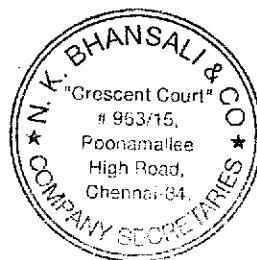
(c) There are no actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder

(d) There are no observation made in previous report, hence action taken from listed entity was not required.

(e) *The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.*

Place : Chennai
Date : 21/05/2022

FOR N K BHANSALI & CO.,
Company Secretaries



(Signature)
N K BHANSALI
Proprietor
PCS 2321 FCS 3942
UDIN:F003942D000360826