

Date: 9/07/2020

To

BSE India Limited  
Corporate Relation Department  
First Floor, New Trading Ring, Rotunda Building P.J. Tower  
Dalal Street, Mumbai-400 051

Script Code: 512197

**Sub: Annual Secretarial Compliance Report of the company for the year ended March 31, 2020**

**Ref: SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019**

With reference to the SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, Please find enclosed Annual Secretarial Report signed by the practicing company Secretary for year ended March 31, 2020.

Please take the above information on record.

For Silveroak Commercials Limited



Mr Alkesh Rawka  
Resolution Professional in the matter of Silveroak Commercials Ltd  
IP Reg. No. - IBBI/IPA-001/IP-P01212/2018-19/11924

**OFFICE ADDRESS:**

C-402, FORTIUS, Space Olympia,  
Sutgiri Chowk, Aurangabad 431001  
Email: ipalkeshrawka@gmail.com



# ANIRUDDHA DEKHANE & ASSOCIATES

## COMPANY SECRETARIES

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### Secretarial Compliance Report of Silveroak Commercials Ltd for the year ended 31<sup>st</sup> March 2020

I Aniruddha Dekhane Practicing Company Secretary having office at Office No 216, Pournima Tower, Shankar Seth Road, Next to Petrol Pump, Swargate Pune-411037 have examined:

- a) all the documents and records made available to us and explanation provided by Silveroak Commercials Ltd (the listed entity)
- b) the filing and submission made by listed entity to the stock exchange,
- c) Website of listed Entity
- d) any other document /filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March 2020 ("Review Period") in respect of compliance with provision of:
  - a) the securities and exchange Board of India Act 1992 (SEBI Act) and the regulations, Circulars, guidelines issued thereunder: and
  - b) the securities Contract (Regulation) Act 1956 ("SCRA") rules made thereunder and the regulations Circulars, guidelines issued thereunder by the Securities 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2018;
- (b) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2017;
- (c) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.
- (d) The Securities and Exchange Board of India (Share based employee benefits) Regulations, 2014 : There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.

# ANIRUDDHA DEKHANE & ASSOCIATES

## COMPANY SECRETARIES

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- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable.
- (f) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client:
- (g) The Securities and Exchange Board of India (Delisting of Equity Shares) (amendment) regulations 2018: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable. And
- (h) The Securities and Exchange Board of India (Buyback of Securities) (amendment) regulations 2015: There are no events occurred during the period which attracts provisions of these guidelines hence not applicable

And based on the above examination, I hereby report that, during the review period:

- a) The listed entity has complied with provisions of the regulations and circulars/guidelines issued there under except in respect of matters specified below:-

Sr No:	Compliance requirement	Deviations	Observation and Remark by PCS
1	Regulation 6 (1) Non Compliance with requirement to appoint a qualified company secretary as the compliance officer	NA	Not appointed till the date
2	Regulation 33 Quarterly Financial Results	NA	Not submitted From Quarter March 2019 June 2019, Sept 2019, Dec 2019, March 2020
3	Regulation 7 Non- appointment of Share transfer agent	NA	The company have appointed Share Transfer Agent as

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## COMPANY SECRETARIES

			per regulation 7(1) and As per Regulation 7 (3) The company has filed Half yearly Compliance Certificate of Share transfer Agent and The Company have paid all the fees to share transfer agent.
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- b) Silveroak Commercials Limited, the listed entity do have the paid capital less than 10 crore and networth less 25 crores and hence compliance with the corporate Governance provisions as specified in SEBI (LODR) Regulations 17,17A, 18, 19 ,20 ,21 ,22, 23, 24, 24A, 25, 26, 27 and clauses (b) to (i) of sub regulation (2) of regulation 46 and para C,D and E of Schedule V is not applicable to entity.
- c) The listed entity has maintained proper records under the provisions of the above regulations and circulars/ guidelines made there under in so far as it appears from my examination of those records
- d) the following are the details of actions taken against the listed entity / its promoters/ directors / material subsidiaries either by SEBI or by Stock Exchanges

Sr No:	Action taken by	Details of violation	Observation and Remark by PCS
1.	Bombay Stock Exchange	Rs.1000 per day(Computed till quarter ended March 31 <sup>st</sup> 2019) Total Fine 106200	not appointed Qualified Company Secretary
2.	Bombay Stock Exchange	Rs.1000 per day (computed till quarter ended June 30 <sup>th</sup> 2019) Total Fine 107380	not appointed Qualified Company Secretary
3.	Bombay Stock Exchange	Rs. 1000 per day (Computed till quarter ended	not appointed Qualified Company

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## COMPANY SECRETARIES

		September 30,2019) Total Fine 108560	Secretary
4.	Bombay Stock Exchange	Rs. 1000 per day (computed till quarter ended December 31,2019) Total Fine 108560	not appointed Qualified Company Secretary
5.	Bombay Stock Exchange	Rs. 5000 per day (Computed till quarter ended March 31 <sup>st</sup> 2019 Total Fine 106200	Non- submission of financial results
6.	Bombay Stock Exchange	Rs. 5000 per day (computed till quarter ended June 30 <sup>th</sup> 2019) Total Fine 88500	Non- submission of financial results
7.	Bombay Stock Exchange	Rs. 5000 per day(Computed till quarter ended September 30,2019) Total Fine 106200	Non- submission of financial results
8.	Bombay Stock Exchange	Rs. 5000 per day (computed till quarter ended December 31,2019) Total Fine 94400	Non- submission of financial results
9.	Bombay Stock Exchange	Rs. 1000 per day (computed till quarter ended June 30, 2019) Total Fine 107380	The company have appointed Share Transfer Agent as per regulation 7(1)
10	Bombay Stock Exchange	Rs. 1000 per day (computed till quarter ended September 30, 2019) Total Fine 108560	The company have appointed Share Transfer Agent as per regulation 7(1)

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## COMPANY SECRETARIES

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

f)

Sr No:	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended	Actions taken by the listed entity	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation 6 (1) Non Compliance with requirement to appoint a qualified company secretary as the compliance officer	The Company have not appointed the same	No action taken	Since Company is in Corporate Insolvency Resolution Process from May 2019. The company have not sufficient funds to pay the Qualified company Secretary
2	Regulation 33 Quarterly Financial Results	The Company have not filed the same	No action taken	Since Company is in Corporate Insolvency Resolution Process Quarterly Audit Report and Quarterly

# ANIRUDDHA DEKHANE & ASSOCIATES

## COMPANY SECRETARIES

				Financial Statements is not prepared by the company due to lack funds.
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Place: Pune

Date: 30.06.2020

UDIAN No: A029290B000403246

Aniruddha Dekhane

Proprietor,

**Aniruddha Dekhane & Associates,**

Company Secretaries

ACS No: 29290

C P No.: 10545