

## SANGHVI MOVERS LIMITED

**Regd. Office :** Survey No. 92, Tathwade  
Taluka - Mulshi, Pune, Maharashtra - 411 033, INDIA.  
Tel. : 8669674701/2/3/4 , 020-71044700  
E-mail : sanghvi@sanghvicranes.com  
Web. : www.sanghvicranes.com  
CIN No.: L29150PN1989PLCO54143



REF: SML/SEC/SE/20-21/25

Date: 30<sup>th</sup> July 2020

### By Online filing

#### **BSE Limited**

Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai- 400001  
**Kind Attn.: Ms. Pooja Sanghvi - Relationship Manager**  
**Ref: Code No. 530073**

#### **National Stock Exchange of India Limited**

Exchange Plaza,  
Bandra Kurla Complex  
Bandra East, Mumbai - 400051  
**Kind Attn.: Mr. K. Hari - Asst. Vice President**  
**Symbol: SANGHVIMOV**

**Sub: Submission of Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2020.**

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; Please find enclosed herewith the Annual Secretarial Compliance Report of the Company, for the year ended 31<sup>st</sup> March 2020, issued by Mr. Vinayak S. Khanvalkar, Partner, Kanj & Co. LLP, Company Secretaries, Pune.

Kindly take the same on record and acknowledge.

Thanks & Regards,

**For Sanghvi Movers Limited**

**Rajesh P. Likhite**  
**Company Secretary &**  
**Chief Compliance Officer**



Encl.: As above

## Secretarial compliance report of Sanghvi Movers Limited

for the year ended on 31<sup>st</sup> March, 2020

We have examined:

- (a) all the documents and records made available to us and explanation provided by Sanghvi Movers 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 31<sup>st</sup> March, 2020 ("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; Not Applicable to the Listed entity during review period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable to the Listed entity during review period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; Not Applicable to the Listed entity during review period;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable to the Listed entity during review period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And (other regulations as applicable) and circulars/ guidelines issued thereunder including SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October 2019 and has amended the terms of appointment of Statutory Auditor to cover the conditions specified under Clause 6(A) and 6(B) of the said circular;



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 and subject to the observations stated as follows: -

Sr. no.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing company Secretary
	-	-	-

- (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 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: NIL.

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
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 the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	Regulation 17 (1) regarding composition of Board of Directors.	We have been informed that names of Late Mr. Chandrakant Sanghvi and Mrs. Mina Sanghvi are entered erroneously in the list of disqualified directors published by MCA (the list), as both of them had resigned as directors of respective private limited companies prior to 31 <sup>st</sup> March, 2014 i.e. prior to the commencement of Companies Act, 2013 and their names are appearing in the list due to non-filing of e-form 32 with the Registrar of Companies by the respective private limited companies intimating their resignations. We are also informed that necessary letters were submitted to the Registrar of Companies by the above directors for removal of their names which	Mr. Mina Sanghvi has resigned as Director of the Company 23 <sup>rd</sup> May 2019 and the Company has appointed Mrs. Maithili Sanghvi as Woman director and Mrs. Madhu Dubhashi as Independent Director to Comply with the Requirement valid composition of Board of Directors	Post appointment of Mrs. Maithili Sanghvi and Mr. Madhu Dubhashi the Composition of Board of Directors has been in line with the provisions of the Regulation.

		according to them are erroneously appearing in the list. However, as per the list published by MCA, names of the above-mentioned directors are appearing in the list of disqualified directors. In our view, the composition of Board of Directors is affected due to such disqualification.	
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\*Note: Due to COVID-19 outbreak and Lockdown situation, this Certificate/Report has been issued relying on the certificate, information, details, data, documents and explanation provided by the Company and its officers, agents and authorized representatives and Registrar and Transfer Agent in electronic form, without physically verifying at their office.

For KANJ & Co. LLP,  
Company Secretaries,



V. S. Khanvalkar

Partner

FCS: 2489

C P No: 1586

UDIN: F002489B000522052



Date: 29/07/2020

Place: Pune