

# SPACE INCUBATRICES TECHNOLOGIES LIMITED

Regd. Office: Pawan Puri, Muradnagar, Ghaziabad-201206 (U.P.)

CIN: L17100UP2016PLC084473

E-mail- spaceincubatrices@gmail.com, Web: www.spaceincubatrices.com, Phone: 01232- 261288

Date: 06.07.2020

To,  
Dy. General Manager (Listing)  
Department of Corporate Services  
BSE Limited  
PhirozeJeejeebhoy Towers,  
Dalal Street, Mumbai-400 001

**Scrip Code: 541890**  
**Scrip ID: SPACEINCUBA**

**Sub: Annual Secretarial Compliance Report under Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosures Requirements) Regulations, 2015**

Dear Sir,

Please find enclosed herewith Secretarial Compliance Report under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 issued by Dinesh Kumar Gupta, Practicing Company Secretary, for the F.Y. ended 31/03/2020.

Please take the same on record.

Thanking You,

Sincerely yours,

For SPACE INCUBATRICES TECHNOLOGIES LIMITED



(Nishant Mittal)  
Managing Director  
Din: 02766556

Residential Address:

Flat No. 603, Tower-2, Orange County,  
Ahinsa Khand-1, Near Aditya Cinemas,  
Indirapuram, Shipra Sun City,  
Ghaziabad-201014, Uttar Pradesh



Encl -as above

**Secretarial Compliance Report of Space Incubiatrics Technologies Limited  
FOR THE FINANCIAL YEAR ENDED ON 31<sup>ST</sup> MARCH 2020  
[Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> Feb. 2019]**

To  
The Members,  
**Space Incubiatrics Technologies Limited**  
CIN: L17100UP2016PLC084473  
Reg. Office: Pawan Puri, Muradnagar, Dist. Ghaziabad, UP-201206 IN

I, Dinesh Kumar Gupta, Practicing Company Secretary (FCS No. 5226 and C. P. No. 3599) have examined:

- (a) all the documents and records made available to us *(due to prevailing COVID-19 countrywide lockdown since 24<sup>th</sup> March 2020, record maintained by the Company and various returns filed were supplied to us electronically through e-mail and our examination is based on documents provided and explanations furnished without any physical verification of the records)* and explanation provided by Space Incubiatrics Technologies 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 company during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable to the company during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable to the company during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not applicable to the company during the period under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2015;

(j) Any circulars/ guidelines issued thereunder

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, except in respect of matters specified below:-

Sl. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
	NIL		

(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) 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:

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.
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1	SEBI against the directors of Sybly Industries Limited, who are also the directors on the Board of Space Incubatics Technologies Limited	SEBI has initiated adjudication proceedings under Section 15HA of the Securities and Exchange Board of India Act, 1992 (hereinafter referred to as " <b>SEBI Act, 1992</b> ") for the alleged violation of the provisions of Section 12A(a), (b), (c) of SEBI Act, 1992 read with Regulations 3(a), (b), (c), (d) and 4(1), 4(2)(f), (k), (r) of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to Securities Market) Regulations 2003 and under Section 23E of Securities Contracts (Regulation) Act, 1956 (hereinafter referred to as " <b>SCRA, 1956</b> ") for the alleged violation of the provisions of Section 21 of SCRA, 1956 read with Clauses 32, 36(7) and 50 of Listing Agreement in the matter of GDR issued by Sybly Industries Limited	1. Fine/ penalty were imposed on all active directors of the concerned company vide order No.  <b>Order/SRP/ AE/2018-19/ 2397 dated 15<sup>th</sup> March 2019</b>  2. restrained from accessing the security market and prohibits from buying, selling or otherwise dealing in securities directly or indirectly or being associated with security market in any manner whatsoever for a period of 5 years from the date of order dated 16 <sup>th</sup> Nov. 2018	The Company has filed an appeal against the said order of SEBI in Securities Appellate Tribunal ( <b>SAT</b> ) and final outcome of the said appeal is awaited.

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended... (The years are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
	<b>There are no observations made in previous Annual Secretarial Compliance Report.</b>			

Place: Meerut

**for D. K. GUPTA & CO.**  
(Company Secretaries)

Date: 6<sup>th</sup> July 2020

**UDIN: F005226B000419301 Dated 6<sup>th</sup> July 2020**

**DINESH KUMAR GUPTA**  
(Proprietor)

C. P. No. 3599  
M. No. F-5226

Note : This report is to be read with our letter of even date which is annexed as 'ANNEXURE - A' and forms an integral part of this report.

**'ANNEXURE - A'**

To

The Members,

**Space Incubatrix Technologies Limited**

CIN: L17100UP2016PLC084473

Reg. Office: Pawan Puri, Muradnagar, Dist. Ghaziabad, UP-201206 IN

My report of even date is to be read along with this letter.

1. Maintenance of Secretarial record is the responsibility of the management of the Company. My responsibility is to express as opinion on these secretarial records based on my audit.
2. I have followed the audit practices and process as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Where ever required, I have obtained the Management representation about the compliance of laws, rules and regulations and happening of events etc.
5. The compliance of the provisions of SEBI laws, Corporate and other applicable laws, Rules, Regulations, Standards is the responsibility of management. My examination was limited to the verification of procedure on test basis.
6. Due to prevailing COVID-19 countrywide lockdown since 24<sup>th</sup> March 2020, record maintained by the Company and various returns filed were supplied to us electronically through e-mail and our examination is based on documents provided and explanations furnished without any physical verification of the records.
7. The Secretarial Compliance Report is neither an assurance as to the future viability of the Company nor of the efficacy or effectiveness with which the management has conducted the affairs of the Company.

Place: Meerut

**for D. K. GUPTA & CO.**  
(Company Secretaries)

Date: 6<sup>th</sup> July 2020

**UDIN: F005226B000419301 Dated 6<sup>th</sup> July 2020**

**DINESH KUMAR GUPTA**  
(Proprietor)

C. P. No. 3599  
M. No. F-5226