

Ref: STL/Secretarial Compliance Report/Reg 24A/BSE/NSE/27052021

Dated: 27th May, 2021

To,
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street
Mumbai – 400 001

To,
Listing Department
National Stock Exchange of India Limited
C-1, G-Block, Bandra-Kurla Complex
Bandra , (E), Mumbai, - 4000051

BSE Code: 541163; NSE: SANDHAR

Subject: Submission of Annual Secretarial Compliance Report for the financial year ended 31st March, 2021.

Ref: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), Regulations 2015 ("Listing Regulations") read with SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019

Dear Sir/Madam,

Pursuant to above-referred regulation, we submit herewith Annual Secretarial Compliance Report, for the year ended 31st March, 2021.

We request you to take the same on record.

Thanking you,

For Sandhar Technologies Limited


Komal Malik
Company Secretary &
Compliance Officer



Sandhar Technologies Limited



K K SACHDEVA & ASSOCIATES

Company Secretaries

201, 3rd Floor, Dr. Mukherjee Nagar, Delhi-110009

Ph. 011 40394670, 9811071577, E-mail: kks445@gmail.com

SECRETARIAL COMPLIANCE REPORT OF SANDHAR TECHNOLOGIES LIMITED For the year ended 31.03.2021

We, K K Sachdeva & Associates, have examined:

- (a) all documents and records made available to us and explanation provided by Sandhar 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 31.03.2021 ("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; (There were no events requiring compliance during the review period)
- (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; (There were no events requiring compliance during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (There were no events requiring compliance during the review period)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (There were no events requiring compliance during the review period)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (There were no events requiring compliance during the review period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder;



and based on the above examinations 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.
- (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) There was 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 in so far as it appears from our examination of those records.
- (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 report	Observations made in the secretarial compliances report for the year ended	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	The Company had violated Regulation 29(2)/(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation 2013	31.03.2020	The Company had paid fine/ penalty imposed by BSE Ltd (BSE) and National Stock Exchange of India Ltd (NSE)	The Company had taken the action and paid the fine/ penalty imposed by BSE Ltd (BSE) and National Stock Exchange of India Ltd (NSE)

Place: New Delhi

Date: 21.05.2021

for K K Sachdeva & Associates
Company Secretaries


K.K.Sachdeva
Proprietor

FCS No. 7153, CP No. 4721

UDIN: F007153C000362663

