

# SHREE GLOBAL TRADEFIN LIMITED

Regd. Off: 35, Ashok Chambers, Broach Street, Devji Ratansey Marg, Masjid, Mumbai – 400 009.  
Tel. 022 – 2348 0526 email : [sgtl2008@gmail.com](mailto:sgtl2008@gmail.com) CIN : L27100MH1986PLC041252 Website : [www.sgtl.in](http://www.sgtl.in)

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**Date: 26<sup>th</sup> June, 2020**

**To,**  
**The Deputy General Manager**  
**Department of Corporate Services**  
The Bombay Stock Exchange Limited  
27th Floor, P.J. Towers, Dalal Street,  
Mumbai - 400 001

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the year ended 31/03/2020**

With reference to the above subject and in terms of the SEBI circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019; we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended 31<sup>st</sup> March, 2020.

Kindly take the same on record,

Thanking you,  
Yours faithfully,  
**For Shree Global Tradefin Limited**

RAJESH  Digitally signed by  
RAJESH RAJNARAYAN  
GUPTA  
Date: 2020.06.26  
10:52:53 +05'30'

**Rajesh Gupta**  
**Managing Director**  
**DIN:00028379**



# B R Gupta & Co.

## Company Secretaries

**Office Add.:** Unit No. 12, 1<sup>st</sup> Floor, Cluster 2, Poonam Cluster 1,2,3, Shanti Park Layout,  
Near Balaji Hotel, Miraroad (E), Thane – 401 107, Maharashtra, India.  
**Email Id:** cs.guptarahul@gmail.com | **Cont. No.:** +91 – 816 919 2320

### **SECRETARIAL COMPLIANCE REPORT OF M/S. SHREE GLOBAL TRADEFIN LIMITED FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2020**

To,  
The Board of Directors,  
**Shree Global Tradefin Limited**

I, Rahul Gupta, Company Secretary in Practice, Proprietor of M/s. B R Gupta & Co. have examined;

- (a) all the documents and records made available to us and explanation provided by Shree Global Tradefin 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<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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (c) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not Applicable during the Review Period**
- (f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018:- **Not Applicable during the Review Period**



## B R Gupta & Co. Company Secretaries

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- (g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;- **Not Applicable during the Review Period.**
- (h) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;— **Not Applicable during the Review Period.**
- (i) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;- **Not Applicable during the Review Period.**
- (j) and such other circulars/guidelines issued and applicable to the Company thereunder.

And based on the above examination, I hereby report that, during the Review Period;

- (a) The listed entity has complied with the applicable provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. 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 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.
Nil				



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(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

**For B. R. Gupta & Co.**  
**Company Secretaries**

RAHUL  
BHARAT  
GUPTA

Digitally signed by RAHUL BHARAT GUPTA  
DN: c=IN, o=Personal, postalCode=400101,  
st=Maharashtra  
2.5.4.20=b0663f900bce2e6ab309317772e  
9f80d81b01a20307556d617ca30806511,  
serialNumber=d9f66c476e4d49060f702  
389763728f7e506d1ca50975d01bc351d1  
c37, cn=RAHUL BHARAT GUPTA  
Date: 2020.06.25 22:11:21 +05'30'

**Rahul Gupta**

**M. No.: 43021 & COP No.: 20863**

**UDIN: A043021B000383218**

**Place:** Thane

**Date:** 25/06/2020

**Note:**

Due to outbreak of **Noval Corona Virus** ("Covid-19") in the Country and in compliance of Government of India orders and restrictions of movement of people, we are doing work from home therefore, signing of this submission is being submitted as Digital Signature.