

Ref: SEL/2021-22/14

June 30, 2021

To,  
The Dy. Gen Manager  
Corporate Relationship Dept.  
**BSE Limited**  
PJ Tower, Dalal Street,  
Mumbai- 400 001

**National Stock Exchange of India Ltd.**  
Exchange Plaza, Plot no. C/1, G Block,  
Bandra-Kurla Complex, Bandra (E),  
Mumbai - 400 051  
Fax : 022-26598237-38

**Equity Scrip Name: SADBHAV**

**Equity Scrip Code:532710**

**Sub: Compliance under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.**

Dear Sir/ Madam,

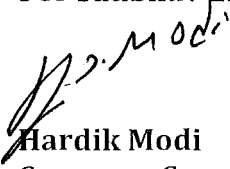
Pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019 read with Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report issued by M/s. Ravi Kapoor & Associates, Company Secretary in Practice for the financial year ended 31<sup>st</sup> March, 2021.

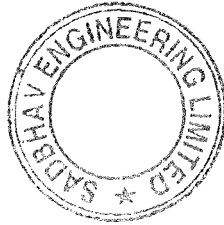
You are requested to take the above on your record.

Thanking you.

Yours truly,

**For Sadbhav Engineering Limited**

  
**Hardik Modi**  
Company Secretary  
Membership No. F9193



**Sadbhav Engineering Limited**

Regd Office: "Sadbhav House", Opp. Law Garden Police Chowki, Ellisbridge, Ahmedabad – 380006

T : +91 79 26463384 F : +91 79 26400210 E : info@sadbhav.co.in Web : www.sadbhaveng.com CIN : L45400GJ1988PLC011322

**SECRETARIAL COMPLIANCE REPORT OF SADBHAV ENGINEERING LIMITED FOR  
THE YEAR ENDED 31<sup>ST</sup> MARCH, 2021**

I Ravi Kapoor have examined:

- all the documents and records made available to us and explanation provided by representative of **SADBHAV ENGINEERING LIMITED** ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- 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, 2021 in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

and based on the above examination, I hereby report that, during the Review Period:

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

*Ravi Kapoor*  
Ravi Kapoor & Associates  
Ahmedabad  
COP-2407  
Company Secretaries



# Ravi Kapoor & Associates

4<sup>th</sup> Floor,  
"Shaival Plaza",  
Gujarat College Road,  
Ellisbridge, Ahmedabad-380 006.  
☎ 26420336/7/9 (R) 26568212  
Fax : 079-26424100, (M) 98250 63147  
E-mail : ravi@ravics.com www.ravics.com

**Company Secretaries**

**Trade Mark Agent**

**Insolvency Resolution Professional**

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	The Company was required to make prior intimation with the Stock Exchange(s) with respect to payment of Interest and Redemption of Debt Securities as per Regulation 60 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Company has not made prior intimation in respect of debentures amounting to Rs 5.00 Crores redeemed on 18 <sup>th</sup> September,2020	Company has not made prior intimation in respect of debentures amounting to Rs 5.00 Crores redeemed on 18 <sup>th</sup> September,2020 and to that extent Company has not complied with Regulation 60 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015
2.	Pursuant to Regulation 30 and Regulation 51(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, it is required to mention the reason for revision in Credit Rating.	Company on 24 <sup>th</sup> September, 2020 had filed with Stock Exchange Credit Rating Revision letter as required under Regulation 30 and Regulation 51(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. However, reason for the same as required under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.	Company has failed to mention the reason for revision of Credit Rating in pursuance to Regulation 30 and Regulation 51(2) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
3.	Pursuant to SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019, the Company was required to make disclosure with the Stock Exchange(s) with respect to default	Information with respect to payment of interest/repayment of principle amount on loans from Banks/Financial Institutions, including default made if any, is not available and accordingly Company may not have been in Compliance of	Information with respect to payment of interest/repayment of principle amount on loans from Banks/Financial Institutions, including default made if any is not available and accordingly we are not able to comment on Compliance of SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/20

*Ravi Kapoor*





# Ravi Kapoor & Associates

4<sup>th</sup> Floor,  
"Shaival Plaza",  
Gujarat College Road,  
Ellisbridge, Ahmedabad-380 006.  
© 26420336/7/9 (R) 26568212  
Fax : 079-26424100, (M) 98250 63147  
E-mail : ravi@ravics.com www.ravics.com

**Company Secretaries**

**Trade Mark Agent**

**Insolvency Resolution Professional**

	in payment of interest/repayment of principle amount on loans from Banks/Financial Institutions.	SEBI Circular no. SEBI/HO/CFD/CMD1/CIR/P/2019/140 dated November 21, 2019	19/140 dated November 21, 2019
4.	In terms of SEBI Circular No SEBI/HO/MIRSD/CR ADT/CIR/P/2020/207, Company was required to maintain Recovery Expense Fund (REF) with respect to its Listed Debt Securities.	Company has not maintained Recovery Expense Fund (REF) with respect to its Listed Debt Securities with the Stock Exchange	In terms of SEBI Circular No SEBI/HO/MIRSD/CR ADT/CIR/P/2020/207, Company has not maintained Recovery Expense Fund (REF) with respect to its Listed Debt Securities with the Stock Exchange

- (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.
Nil				

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

*Ravi Kapoor*



**Ravi Kapoor  
&  
Associates**

4<sup>th</sup> Floor,  
"Shaival Plaza",  
Gujarat College Road,  
Ellsbridge, Ahmedabad-380 006.  
© 26420336/7/9 (R) 26568212  
Fax : 079-26424100, (M) 98250 63147  
E-mail : ravi@ravics.com www.ravics.com

**Company Secretaries**

**Trade Mark Agent**

**Insolvency Resolution Professional**

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31/03/2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
N.A.				

Place: Ahmedabad

Date: 30<sup>th</sup> June, 2021

For, Ravi Kapoor & Associates



Ravi Kapoor

Company Secretary in practice

FCS No. 2587

C P No.: 2407

UDIN: F002587C000552543

