CIN: L51909DL1933PLC009509
Website: www.sirshadilal.com, Email:udsm\_shamli@sirshadilal.com

## Registered Post

To, Date: 29.05.2019

The Department of Corporate Affairs The Bombay Stock Exchange Limited 25Th Floor P J Towers, Dalal Street, Mumbai -400001, India

Subject: Annual Secretarial Compliance report

Sir Shadi Lal Enterprises Limited - Scrip Code- 532879

Dear Sir

With reference to the above captioned pursuant to SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08,2019, we are submitting herewith Annual Secretarial Compliance Report dated 29.05.2019, issued by Practicing Company Secretary for the year ended 31.03.2019 for your record.

You are requested to take the above information on your record and acknowledge the same.

Thanking You,

Yours Faithfully

For Sir Shadi Lal Enterprises Limited

(Ajay Kumar Jain) Company Secretary



राहुल सैनी एण्ड कम्पनी कम्पनी सैक्रेट्रीस दितीय तत, महाराजा आकेंड, निकट नन्दन सिनेमा गढ़ रोड, मेरठ उत्तर प्रदेश २५०००२

Ph: +91 9897557288, 9917677600

SECRETARIAL COMPLIANCE REPORT OF SIR SHADIL LAL ENTERPRISES LTD. FOR THE YEAR ENDED MARCH 31<sup>ST</sup>, 2019 [Pursuant to SEBI-CIR/CFD/CMD/1/27/2019 Dated February 08, 2019]

We, Rahul Saini & Co, Company Secretaries, having our office at II Floor, Maharaja Arcade, Near Nandan Cinema, Garh Road, Meerut U.P 250002 have examined:

 (a) All the documents and reports made available to us and explanations provided by Sir Shadi Lal Enterprises Ltd. ("the listed entity");

(b) The filings/ submissions made by the listed entity to the stock exchanges;

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 31-03-2019 ("Review Period") in respect of compliances 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:-

 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; (not attaracted during year under review)

© Securities and Exchange Board of India (Substantial Aqusition of Shares and Takeovers) Regulations, 2011; (not attaracted during year under review)

(d) Securities and Exchange Board of India (Buy Back of Securities) Regulations, 2018; (not attaracted during year under review)

(e) Securities and Exchange Board of India (Share Based Employee Benefits)



Regulations, 2014; (not attaracted during year under review)

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities)
Regulations, 2018; (not attaracted during year under review)

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (not attaracted during year under review)

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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:-

|   | Compliance<br>(Regulations,<br>guidelines including<br>circulars clause) | Requirements | Deviations | Observations and<br>remarks of the<br>Practising Company<br>Secretary |
|---|--------------------------------------------------------------------------|--------------|------------|-----------------------------------------------------------------------|
| 1 | 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 observation of those records,
- (c) The Following are details of action 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.<br>No. | Action<br>taken by | Details of Violation | Details of action taken<br>e.g. fines, warning,<br>letter, debarment etc. | THE RESERVE OF THE PARTY OF THE |
|------------|--------------------|----------------------|---------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|            | NIL                | NIL                  | NIL                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |

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

| Company      | Observations made<br>in the Secretarial<br>Compliance Report<br>for the year ended | Actions taken by the listed entity, if any | the Practising<br>Company<br>Secretary on |
|--------------|------------------------------------------------------------------------------------|--------------------------------------------|-------------------------------------------|
| Secretary in | March 31st, 2019                                                                   |                                            | the actions                               |



| the previous reports |                |                | taken by the listed entity |
|----------------------|----------------|----------------|----------------------------|
| NOT<br>APPLICABLE    | NOT APPLICABLE | NOT APPLICABLE | NOT<br>APPLICABLE          |
| 4                    |                |                |                            |
|                      |                |                |                            |

Place: Meerut (U.P) Date:29.05.2019 For Rahul Saini & Co COMPANY SECRETARIES

Rahul Saini Propritor C.P No: 7009 Membership No: ACS 16716