

Date: 29/06/2021

**The General Manager**  
**Department of Corporate Services**  
**BSE Limited**  
Phiroze Jeejeebhoy Tower,  
Dalal Street, Mumbai – 400 001

**Manager - Listing**  
**Listing Department**  
**National Stock Exchange of India Limited**  
Exchange Plaza, Bandra Kurla Complex,  
Mumbai – 400 051

**Sub: Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021**  
**Ref: BSE Scrip Code 533259; NSE Symbol: SASTASUNDR**

Dear Sir/ Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read along with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019 please find enclosed herewith Annual Secretarial Compliance Report for the financial year ended 31<sup>st</sup> March, 2021 from Practicing Company Secretary for your records and reference.

Kindly acknowledge the receipt of the same.

Thanking you,

Yours faithfully

For Sastasundar Ventures Limited

  
**Pratap Singh**  
**Company Secretary & Compliance Officer**



Encl: as above



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

I, Neha Somani, Partner of M/s MKB & Associates, Company Secretaries in Practice, have examined:

- (a) all the documents and records made available to us and explanation provided by **SASTASUNDAR VENTURES 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, 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations (as amended from time to time), to the extent applicable, whose provisions and the circulars/ guidelines issued there under, 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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018; and circulars/ guidelines issued there under;

and based on the above examination, and considering the relaxations granted by Ministry of Corporate Affairs and Securities and Exchange Board of India due to COVID-19 pandemic, 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:-

Sr. No.	Compliance Requirement (Regulations/ guidelines including specific clause)	Requirement circulars/ specific	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 17(1)(a) of SEBI (Listing Obligations and Disclosure Requirements), 2015		The company did not have an independent woman director on its Board from 01.04.2020 to 14.09.2020	The company appointed independent woman director on its Board on 15.09.2020

- (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 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
1	BSE Limited (BSE)	As required under proviso to Regulation 17(1)(a) of SEBI (Listing Obligations and Disclosure Requirements), 2015, the company did not have an independent woman director on its Board from 01.04.2020 to 14.09.2020.	Fine was imposed by BSE. The same was waived off by BSE on the request of the Company.	The company appointed independent woman director on its Board on 15.09.2020
2	National Stock Exchange of India Limited (NSE)		Fine was imposed by NSE. Application for waiver has been made which is pending.	





- (d) The listed entity has taken the following actions to comply with the observations made in the 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 31 <sup>st</sup> March, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable, as there were no observation in the previous report				

- (e) During the year under review no appointment/ re-appointment/ resignation of statutory auditor of the Company had occurred. The Company has complied with Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019.

For MKB & Associates  
Company Secretaries  
Firm Reg No: P2010WB042700

  
Neha Somani  
Partner

Membership no. 44522  
COP no. 17322

Date: 22.06.2021  
Place: Kolkata  
UDIN: A044522C000499671