# SANEH INDUSTRIAL INVESTMENTS LIMITED

Regd. Office : 'Delton House', 4801, Bharat Ram Road 24, Darya Ganj, New Delhi-110 002 (INDIA)
Phones : 91-11-23273907
**CIN : L74899DL1980PLC060079**

To,

Date: $26^{th}$ June, 2021

The Manager,
The Calcutta Stock Exchange Limited
7, Lyons Range, Kolkatta-700 001

**Subject : Secretarial Compliance Report under Regulation 24 A of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015**

Dear Sir/Madam,

Pursuant to Regulation 24 A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed the Secretarial Compliance Report for the year ended on $31^{st}$ March, 2021 issued by M/s Vaibhav Sharma & Associates, Practicing Company Secretaries.

Kindly take the same on your record in compliance of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Thanking You,

**For Saneh Industrial Investments Limited**

**Authorised Signatory**

**VAIBHAV SHARMA AND ASSOCIATES**
**COMPANY SECRETARIES**
**105-106A, Apra Plaza Complex Road No.44, Community Centre, Rani Bagh, Pitampura, New Delhi-110034**
**Tel: 9953901363, 9811134037. Email: sharma.vaibhav129@gmail.com**

**SECRETARIAL COMPLIANCE REPORT OF M/S SANEH INDUSTRIAL INVESTMENTS LIMITED FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2021**

To,
The Members,
Saneh Industrial Investments Limited
Delton House 4801, Bharat Ram Road
24 Daryagunj, New Delhi - 110002

We, **M/s Vaibhav Sharma and Associates** have examined:

(a) all the documents and records made available to us and explanation provided by **M/s Saneh Industrial Investments Limited** (hereinafter referred as "the listed entity"),
(b) the filings/ submissions made by the listed entity to the stock exchange,
(c) website of the listed entity,

for the year ended 31st March, 2021 in respect of the 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, 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 (Substantial Acquisition of Shares and Takeover) Regulations, 2011;
(c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
(d) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009; *(Not Applicable for reporting audit period)*
(e) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998 *(Not Applicable for reporting audit period)*
(f) The Securities and Exchange Board of India (Share Base Employee Benefits) Regulations, 2014; *(Not Applicable for reporting audit period)*
(g) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 *(Not Applicable for reporting audit period)*
(h) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 *(Not Applicable for reporting audit period)*

VAIBHAV SHARMA & ASSOCIATES
Company Secretaries
C.P. No. 10831
New Delhi

and based on the above examination, we hereby report that during the audit period covering the financial year ended on 31st March, 2021:

(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/ Circulars/ guidelines including specific clause) | Deviation | Observation/ Remarks of the Practicing Company Secretary |
|---|---|---|---|
| 1. | Regulation 17 of SEBI (LODR) Regulations, 2015 | Company has not appointed Independent Directors. | As the Company is going under delisting procedure, the company has not appointed Independent Director. |
| 2. | Regulation 18, 19 and 20 of SEBI (LODR) Regulations, 2015 | Company has not constituted the Audit, Nomination and Remuneration and Stakeholder Relationship Committee | As the Company is going under delisting procedure, the company has not constituted the said committees. |
| 3. | Regulation 46 of SEBI (LODR) Regulations, 2015 | Company does not have a website. | As the Company is very small company and doing no business for last over 20 years. Further as the shares of the company are not traded for more than 20 years and the management of the Company is willing to delist the securities of the company from the Stock Exchange, no website has been launched by the Company. |

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appear from 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 Procedure issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

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Company Secretaries
C.P. No. 10831
New Delhi

| Sr. No. | Action taken by | Details of violation | Details of action taken e.g. fines, warning letter, debarment, etc. | Observation/ Remarks of the Practicing Company Secretary, if any. |
|---|---|---|---|---|
| - | Nil | (i) Company has not appointed Independent Directors.<br><br>(ii) Company has not constituted the Audit, Nomination and Remuneration and Stakeholder Relationship Committee<br><br>(iii) Company does not have a website. | Nil | (i) & (ii) As the Company is going under delisting procedure, the company has not appointed Independent Director.<br><br>(iii) As the Company is very small company and doing no business for last over 20 years. Further as the shares of the company are not traded for more than 20 years and the management of the Company is willing to delist the securities of the company from the Stock Exchange, no website has been launched by the Company |

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

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Company Secretaries
C.P. No. 10831
New Delhi

| Sr. No. | Observations of the Practicing Company Secretary in the previous report | Observations made in the secretarial compliance report for the year ended 31.03.2020 | Action taken by the listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---|---|---|---|---|
| 1 | (i) Company has not appointed Independent Directors.<br><br>(ii) Company has not constituted the Audit, Nomination and Remuneration and Stakeholder Relationship Committee<br><br>(iii) Company does not have a website. | (i) Company has not appointed Independent Directors.<br><br>(ii) Company has not constituted the Audit, Nomination and Remuneration and Stakeholder Relationship Committee<br><br>(iii) Company does not have a website. | NIL | (i) & (ii) As the Company is going under delisting procedure, the company has not appointed Independent Director.<br><br>(iii) As the Company is very small company and doing no business for last over 20 years. Further as the shares of the company are not traded for more than 20 years and the management of the Company is willing to delist the securities of the company from the Stock Exchange, no website has been launched by the Company |

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I, further report that no event of appointment/re-appointment/resignation of Statutory Auditors of the Company during the year under review and the Company has modified the terms of appointment of its existing Statutory Auditor. In this regard, I report that Company has complied with Para 6(A) and 6(B) of the SEBI Circular No. CIR/CFD/CMD1/114/2020 dated October 18, 2019.

For **M/s Vaibhav Sharma & Associates**

VAIBHAV SHARMA & ASSOCIATES
Company Secretaries
C.P. No. 10831
New Delhi

Vaibhav Sharma ACS-30041

Place: New Delhi
Date: 25/06/2021

**Vaibhav Sharma**
**Practicing Company Secretaries**
ACS No: 30041
C P No: 10831
**UDIN:** A030041C000504251