



"With endless choices of diamonds"

SHEETAL DIAMONDS LIMITED

Diamond & Diamond Jewellery Manufacturer & Exporters

Dated: 27th July, 2020

To,

The Manager

The Listing Dept.

Bombay Stock Exchange Limited

Phiroze Jeejeebhoy Towers, Dalal Street,

Mumbai 400 001

Ref. Scrip Code: 530525, NAME OF COMPANY: SHEETAL DIAMONDS LIMITED

SUB :- SUBMISSION OF ANNUAL SECRETARIAL COMPLIANCE REPORT.

Dear Sir,

As per SEBI circular No. CIR/ CMD1/27/2019 dated 8th February 2019, we enclose the annual Secretarial Compliance Report of dated 26th July, 2020 Kindly take the same on record and acknowledge the receipt.

Thanking You,

Yours Truly,

FOR AND ON BEHALF OF SHEETAL DIAMONDS LIMITED



VINOD TRIKAMLAL SHAH

MANAGING DIRECTOR

(DIN : 01859634)



NISHA UCHIL

PRACTISING COMPANY SECRETARY

A/205, Nandanwan, Tilak Bhavan, Kakasaheb Gadgil Marg, Dadar West,
Mumbai - 400028

Contact: 9820920627 / uchil.nisha@gmail.com

**Secretarial compliance report of SHEETAL DIAMONDS LIMITED for
the year ended 31.03.2020**

I, Nisha Uchil, have examined:

(a) all the documents and records made available to us and explanation provided by SHEETAL DIAMONDS 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 31.03.2020 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



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- (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) (other regulations as applicable) and circulars/ guidelines issued thereunder;

and based on the above examination, I/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.

(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.
1.	BOMBAY STOCK EXCHANGE	Non-submission of shareholding pattern within the period prescribed	Fine of Rs.8000 imposed.	-
2.	BOMBAY	Non-compliance w.r.t.	Fine of	Qualified



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	STOCK EXCHANGE	appointment of qualified company secretary as compliance officer	Rs.25000 imposed.	Company Secretary appointed w.r.t. 01/05/2020
3.	BOMBAY STOCK EXCHANGE	Non-payment of listing fees under Regulation 14 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Warning mail	Payment made on 28/02/2020
4.	BOMBAY STOCK EXCHANGE	Non-submission of Initial Disclosure / Confirmation as per SEBI Circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018	Warning mail	-
5.	BOMBAY STOCK EXCHANGE	Non submission of voting results under regulation 44(3) with the prescribed period	Fine of Rs.10000 imposed.	-
6.	BOMBAY STOCK EXCHANGE	Non-submission of Annual Report under regulation 34	Fine of Rs.72000 imposed.	-
7.	BOMBAY STOCK EXCHANGE	Non-submission of financial results under regulation 33`	Fine of Rs.90000 imposed.	-



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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 endeth	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity

Nyuchil



Nisha Uchil
Practising Company Secretary
ACS – 24798
CoP – 8995
UDIN: A024798B000505696
Date: 26.07.2020
Place: Kalyan