

Ref No.:

Secretarial Compliance Report of Sunil Hitech Engineers Limited
For the year ended 31st March, 2019

Date:

I, Manish Pande, proprietor of Manish Pande & Co., Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Sunil Hitech Engineers 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 31st March, 2019 ("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 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;
- (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 & Participants) Regulations, 2018;

and circulars/ guidelines issued there under;

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 there under, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviation	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in submission of quarterly and year-to-date standalone financial results for the quarter ended on 30 th September, 2018 beyond forty-five days of end of quarter	The company delayed in submission of results. Intimation of delay was duly submitted to the concerned stock exchanges
2	Regulation 33 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in submission of quarterly and year-to-date standalone financial results for the quarter ended on 31 st December, 2018 beyond forty-five days of end of quarter	The company delayed in submission of results. Intimation of delay was duly submitted to the concerned stock exchanges.
3	Regulation 31 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in submission of shareholding pattern for the quarter ended on 31 st December, 2018 beyond twenty one d	The company delayed in submission of shareholding pattern
4	Regulation 13 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Delay in submission of investor complaint statement for the quarter ended on 31 st December, 2018 beyond twenty one	The company delayed in submission of investor complaint statement
5	Regulation 76 of SEBI (Depositories and Participants) Regulations, 2018	Delay in filing reconciliation of share capital audit for the quarter ended on 31 st December, 2018 da	The company delayed in submission of reconciliation of share capital audit

- (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	BSE/NSE	Delay in filing of financial results for the quarter ended on 30 th September, 2018 by 44 days	Letter/Intimation for non-compliance/ imposition of fine issued	The company submitted results for the quarter ended on 30 th September, 2018 on 28 th December, 2018.
2	BSE/NSE	Delay in filing of financial results for the quarter ended on 31 st December, 2018 by 30 days	Letter/Intimation for non-compliance/ imposition of fine issued	The company submitted results for the quarter ended on 31 st December, 2018 on 16 th March, 2019.
3	BSE/NSE	Delay in filing shareholding pattern for the quarter ended on 31 st December, 2018 by 22 days	Letter/Intimation for non-compliance/ imposition of fine issued	The company submitted shareholding pattern for the quarter ended on 31 st December, 2018 on 8 th March, 2019.
4	BSE/NSE	Delay in filing statement of investor complaints for the quarter ended on 31 st December, 2018 by 21 days	Letter/Intimation for non-compliance/ imposition of fine issued	The company submitted statement of investor complaints for the quarter ended on 31 st December, 2018 on 7 th March, 2019.
5	BSE/NSE	Delay in filing reconciliation of share capital audit by 21 days	Letter/Intimation for non-compliance issued by BSE/NSE	The company submitted reconciliation of share capital audit for the quarter ended on 31 st December, 2018 on 14 th March, 2019.

- (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 ended... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA			



Place: Nagpur
Signature:



Manish Pande
Date: 29/05/2019
FCS No.: 5004
C P No.: 3424



MANISH PANDE & CO
COMPANY SECRETARIES
505, Salyam Apartments
Wardha Road, Dhantoli
NAGPUR - 440 012
FCS No. 5004
CP No. 3424