



SULABH

Engineers And Services Limited

CIN : L28920MH1983PLC029879

Web : www.sulabh.org.in
E mail : sulabheng22@gmail.com
sulabhinvestorcell@gmail.com

Date: 28th July, 2020

To
The General Manager
Department of Corporate Services,
Bombay Stock Exchange Limited,
1st Floor, P.J. Towers,
Dalal Street,
Mumbai-400001

(Scrip Code: 508969)

Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2020 as per Regulation 24A of SEBI (LODR) Regulations, 2015

Dear Sir/Madam,

Ref: M/s Sulabh Engineers And Services Limited

Enclosed herewith please find the following documents for your kind perusal:
With reference to the captioned matter, we are enclosing herewith Annual Secretarial Compliance Report of the Company for the year ended 31st March, 2020 issued by Mr. Gopesh Sahu Proprietor of M/s Gopesh Sahu, Company Secretaries.

Kindly take the aforesaid report on your record.

Thanking You,
For Sulabh Engineers and Services Limited

Siddharth Dwivedi
SIDDHARTH DWIVEDI
(Company Secretary & Compliance Officer)



Add: Regd. off. : 206, 2nd Floor, Apollo Complex Premises Cooperative Society Ltd.. R.K. Singh Marg,
Parsi Panchayat Road, Andheri (East), Mumbai-400069
Tel. : +91 22-67707822 **Fax** -+912267707822
Corp. off. : 17/11, The Mall, Kanpur -208 001
Tel. : 0512-2311226, 2319705 **Fax** - 0512-2363774

CS GOPESH SAHU
Practicing Company Secretary

Office: 205-A, Anand Tower 117/K/13,
Sarvodaya Nagar Kanpur-208025
Contact no: 9450338010
E-mail id: csgopesh@gmail.com

UDIN: F007100B000322998

SECRETARIAL COMPLIANCE REPORT

(Pursuant to the SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019)

OF

SULABH ENGINEERS AND SERVICES LIMITED For the year ended 31.03.2020

I, **CS Gopesh Sahu**, Proprietor of M/s Gopesh Sahu, Company Secretaries have examined:

(a) all the documents and records made available to us and explanation provided by **SULABH ENGINEERS AND SERVICES LIMITED**, (CIN L28920MH1983PLC029879) ("the Listed Entity")

(b) the filings/ submissions made by the listed entity to the BSE Ltd.,

(c) website of the Sulabh Engineers And Services Limited,

(d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended **31st March, 2020** ("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) SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;

(b) SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018;

(c) SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

(d) SEBI (Buyback of Securities) Regulations, 2018

(e) SEBI (Share Based Employee Benefits) Regulations, 2014;

(f) SEBI (Issue and Listing of Debt Securities) Regulations, 2008;



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(g) SEBI (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013;

(h) SEBI (Prohibition of Insider Trading) Regulations, 2015;

(i) Circulars/ guidelines issued there under; and based on the above examination, 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 there under as applicable to it. However, the regulations mentioned above under (b) and (d) to (g).

The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my examination of those records.

(b) 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 there under:

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.
01.	BSE Ltd.	Regulation 18(1) of SEBI (LODR) Regulation, 2015	Notice dated 30.08.2019 imposing penalty of Rs. 75000.00 (exclusive of GST) for non compliance of Regulation 33.	Company's reply dated 31.08.2019 seeking waiver from imposition of penalty stating reason that there were no such non compliance of Regulation 33 since the Standalone Results were duly filed in time and it was only consolidated financial statement which was inadvertently left to be filed. Penalty was withdrawn by the BSE considering the request.



CS GOPESH SAHU

Practicing Company Secretary

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02.	SEBI, Enforcement Directorate	Section 11(4) and 11 (B) of SEBI Act, 1992	The Proceedings in the matter are in process.	The matter is sub judice hence, no comments could be made.
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(c) 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	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Place: Kanpur
Date: 06th June, 2020



CS Gopesh Sahu

FCS No.: 7100

CP No.: 7800