

SAINIK FINANCE & INDUSTRIES LIMITED

Regd. Office- 129, Transport Centre, Rohtak Road, Punjabi Bagh, New Delhi – 110035
Corporate Office: 7th Floor, Corporate Office Tower, Ambience Mall, N.H.48, Grurugram-122002
E-mail: info@sainik.org Website: www.sainikfinance.com CIN: L26912DL1991PLC045449
Telephone No.-011-28315036/0124-2719000 Fax No.-011-28315044/ 0124-2719100

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Dated 10-05-2021

To,
The Manager (Listing)
BSE Limited,
Floor 25, P.J. Towers,
Dalal Street, Mumbai-400001

Sub: Submission of Secretarial Compliance Report for the financial year ended March 31, 2021 in accordance with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (Scrip Code: 530265)

Dear Sir,

In compliance of Regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, the Company had appointed M/s S.S. Bhati & Associates, Practicing Company Secretary, Noida as Secretarial Auditors of the Company for the financial year ended March 31, 2021. He carried out /examined all secretarial and other records of the Company and submitted Annual Secretarial Compliance Report for the financial year ended March 31, 2021 with reference to the SEBI circular CIR/CFD/CMD 1 /27 /2019 dated February 8, 2019, we are enclosing herewith such Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021.

This is for your information and records.

Thanking you,
Yours Faithfully
For Sainik Finance & Industries Limited



Jagdish Chandra
CFO

Encl.: As Above



Satyapal Singh Bhati
FCS, M.COM

S.S. BHATI & ASSOCIATES

(Company Secretaries)

SECRETARIAL COMPLIANCE REPORT
OF
FOR THE FINANCIAL YEAR ENDED MARCH 31, 2021
[Pursuant to SEBI Circular No.CIR/CFD/CMD1/27/2019 dated February 8, 2019]

We, Satyapal Singh Bhati, Proprietor of M/s. S.S. Bhati & Associates, Noida have examined:

- a) all the documents and records made available to us through the email and explanation provided by Sainik Finance & Industries Limited (**the 'Listed Entity'**).
- b) the filings/ submissions made by the Listed Entity to BSE Limited, a Stock Exchange where the Company is listed.
- c) website of the Listed Entity.
- d) other document/ filing as may be relevant, which has been relied upon to make this certification, for the year ended 31st March, 2021 in respect of compliance with the provisions of:
 - i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circular, guidelines issued thereunder, and
 - ii) the Securities Contract Regulation Act, 1956 ("SCRA") rules made thereunder and the Regulations, circular, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI")

The specific Regulations whose provision and the circulars/ guidelines issued thereunder have been examined include:-

- (a) The Securities and Exchange Board of India (Listing Obligation & Disclosure Requirements) Regulations, 2015;
- (b) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Buyback of Securities) Regulations, 1998;(Not applicable to the Listed Entity during the year under review);
- (e) Securities and Exchange Board of India (Shared Based Employee Benefits) Regulations, 2014 (Not applicable to the Listed Entity during the year under review);

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Listed Entity during the year under review);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the Listed Entity during the year under review);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and circulars/ guidelines issued thereunder.

Based on the above examination, we hereby report that, during the period under review:

- (a) The Listed Entity has complied with provisions of the above Regulations, circular, guidelines issued thereunder, except in respect of matters specified below:

Sr. No.	Compliance Requirements (Regulations/ circulars including specific clause)	Deviation	Observations/ Remarks of the Practicing Company Secretary
Not Applicable			

- (b) The Listed Entity has maintained proper records under the provisions of the above Regulations, circular, guidelines issued thereunder insofar as it appears from our examinations 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 Stock Exchange (*including under the Standard Operating Procedures issued by SEBI through various circulars*) under the aforesaid Acts Regulations, circular, 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
Not Applicable				

- (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 31 st March, 2021	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by the listed entity
Not Applicable				

Further, in view of the high spread of Corona Virus (COVID-19 pandemic), we have verified the information and documents which are provided by the management of the Company on the email and uploaded at its website & BSE website but we have not verified any documents physically.

For S.S.BHATI & ASSOCIATES
(Company Secretaries)

SATYAPAL SINGH BHATI
Digitally signed by
SATYAPAL SINGH
BHATI
Date: 2021.04.28
12:00:24 +05'30'

Date: April 28, 2021
Place: Noida

Satyapal Singh Bhati
Proprietor
FCS No.8252, CP No.9387
UDIN-**F008252C000196814**