

# SCP & CO.

Company Secretaries

## SECRETARIAL COMPLIANCE REPORT OF SUMIT WOODS LIMITED FOR THE YEAR ENDED MARCH 31, 2021

***[Under Regulation 24(A) of Securities and Exchange Board of India (Listing  
Obligation & Disclosure Requirements) Regulation 2015]***

We **SCP & CO.** have examined:

- a) all the documents and records made available to us and explanation provided by **SUMIT WOODS 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 March 31, 2021 (“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; **(Not Applicable to the Company during the Audit Period)**
- 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; **(Not Applicable to the Company during the Audit Period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period)**

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**Reg. Office: A- 302, Old Ashok Nagar, Vazira Naka, L .T. Road, Borivali west, Mumbai 400091**  
**Branch Office: 26, Gayatri Industrial Estate, Navghar Vasai (E), Palghar- 401210**  
**M.No:7045000841 / E-mail:- corporateissues1991@gmail.com**

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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the Company during the Audit Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories & Participants) Regulation, 2018 (To the extent applicable)

And based on the above examination, 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, 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 17(1)(c ) of the SEBI (LODR) 2015 : The Board of Directors of the top 2000 listed entities (with effect from April 01, 2020 shall comprises of not less than six directors)	Non-Compliances in the composition of the Board of Directors	Non-compliances in the Composition of the board of directors in regards to the number of directors shall comprise of not less than six directors during the period from 1 <sup>st</sup> April, 2020 to 10 <sup>th</sup> November, 2020

- 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

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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 Letters, debarment, etc	Observations/remark of the Practicing Company Secretary
1	NSE	Non-Compliances in the composition of the Board of Directors	Fine of Rs. 455000/- (Four Lakhs Fifty Five Thousand Only) has been levied on the Company	The Company has appointed Sixth director on November 11, 2020. The Company has made application to NSE for waiver of fine.

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 previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2021	Action taken by the listed entity; if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
<b>NOT APPLICABLE</b>				

**For SCP & Co  
Company Secretaries**

**Swapnil Pande  
M.NO. A44893 C.P.No 21962**

**Place: Mumbai  
Date: 28/06/2021  
UDIN: A044893C000524097**

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