

SAI CAPITAL LIMITED

Regd. Office: G-25, GROUND FLOOR, RASVILAS SALCON D-1, SAKET DISTRICT CENTRE, SAKET, NEW DELHI, SOUTH DELHI -110017
(CIN: L74899DL1995PLC069787), E mail: saicapitallimited@hotmail.com / cs@saicapital.co.in, Ph: 011-40234681
Website: www.saicapital.co.in

June 03, 2020

The Corporate Relationship Department
BSE Limited
P.J. Towers, Dalal Street,
Mumbai - 400 001

(Scrip Code-531931)

Subject: Submission of Annual Compliance Report for the year ended March 31, 2020.

Dear Sir/ Ma' am,

In terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (as amended) read with SEBI Circular No. CIR/CFD/ CMD1/27/2019 dated February 08, 2019, we submit herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2020, duly issued by Ms. Rashmi Sahni – Practicing Company Secretary (C P No.: 10493).

We hereby request you to take the same on your records for the confirmation of compliance.

Thanking You,

Yours Faithfully,
For **Sai Capital Limited**,

**NIRAJ
KUMAR
SINGH**

Digitally signed by NIRAJ KUMAR SINGH
DN: cn=Niraj Kumar Singh, o=Personal, postalCode=110068, st=Delhi, 2.5.4.20=c865c8d1197d8c240b38c488977c0806c95dc2943132ab35e09133023ad, serialNumber=C5090da18c070ee1754b27255886a6278c07a257f199842b725625e6df23ae1, cn=NIRAJ KUMAR SINGH
Date: 2020.06.03 15:02:55 +0530'

Dr. Niraj Kumar Singh
Chairman & Managing Director

Encl: As above



RASHMI SAHNI
COMPANY SECRETARY

Address: B-85, Jhilmil Colony, Shahdara, Delhi-110095

E-Mail-Id : csrashmi3011@gmail.com

Mobile : +91-9999100888

Secretarial Compliance Report of Sai Capital Limited
for the year ended March 31, 2020

I, Rashmi Sahni, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanation provided by Sai Capital Limited, CIN:L74899DL1995PLC069787 (“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 and information/clarification provided by the management of the Company, as may be relevant, which has been relied upon to make this certification,

for the year ended March 31, 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) 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) Any other regulations, circulars etc. issued by SEBI applicable to the Company.

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, However regulations mentioned above under clause (b), (d), (e), (f) and (g) are not applicable to the company during the review period; except in respect of matters specified below:-

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

- (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:

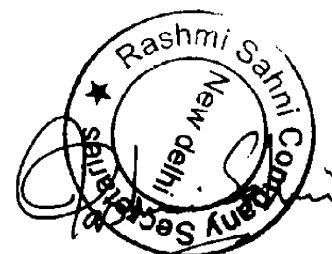
Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
Not Applicable				

- (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 March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: New Delhi

Date: 03.06.2020



Rashmi Sahni

ACS No.: 25681

C P No.: 10493