

# 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

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June 24, 2021

BSE Limited  
Corporate Relationship Department,  
1st Floor, New Trading Ring,  
Rotunda Building,  
P J Towers, Dalal Street,  
Fort, Mumbai – 400 001.

(Scrip Code-531931)

**Sub.: Annual Secretarial Compliance Report for the year ended 31st March, 2021**

**Ref: SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019**

Dear Sirs,

In terms of Clause 3 (b)(iii) of SEBI Circular No. CIR/CFD/CMDI/27/2019 dated 8th February, 2019, we hereby submit the Annual Secretarial Compliance Report of Sai Capital Limited ("the Company") for the year ended 31st March, 2021, issued by Ms. Rashmi Sahni, Practicing Company Secretary and Secretarial Auditor of the Company.

Please acknowledge receipt and take the above on record.

Thanking You,

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

**Dr. Niraj Kumar Singh**  
**Chairman & Managing Director**

*Encl: As above*



**Secretarial Compliance Report of Sai Capital Limited  
for the year ended March 31, 2021**

I, Rashmi Sahni, Practicing Company Secretary have examined:

- (a) all the documents and records made available to us and explanations 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, 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;
- (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.   |
|---------|-----------------|---|---|--|
| 1       | BSE Limited     | Regulation 33<br>Delay in submission of Consolidated Financial Results within the period prescribed under this regulation | Levy of fine of Rs. 5,000 per day till the date of compliance.      | The Company has made good the delay in compliance by submission of Consolidated financial results and has duly paid the fine as levied by the Stock Exchange for such delay.<br>Further, the company |

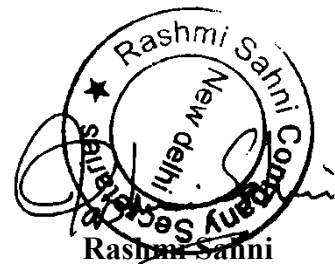


|  |  |  |  |   |
|--|--|--|--|---|
|  |  |  |  | has stated the reasonable cause to the Stock exchange for such delay. |
|--|--|--|--|---|

- (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, 2021 | Actions 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> |  |  |  |  |

Place: New Delhi  
Date: 22-06-2021



Rashmi Sahni

ACS No.: 25681

C P No.: 10493

UDIN: A025681C000498538