



DIPTI DAMANI

Practicing Company Secretary

71/3, Canal Circular Road

Prasad Exotica, Block 5 3B, Kolkata: 700054

Mob: +91 9836157419

Email Id: diptirandar@gmail.com

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial Compliance Report Of Swati projects Limited For The year Ended March 31,2020

I, have examined:

- (a) all the documents and records made available to us and explanation provided by **SWATI PROJECTS LIMITED** ("the listed entity"),
- (b) the filings submissions made by the listed entity to the stock exchange(s),
- (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, 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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars / guide lines issued there under, 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 during the review 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 during the review period**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;- **Not applicable during the review period**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;- **Not applicable during the review period**





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(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;- **Not applicable during the review period**

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

(i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; -

(j) Any other regulations, circulars, guidelines etc. issued by SEBI and applicable to the Company 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 there under, to the extent applicable and in the manner prescribed, except in respect of matters specified below:

Sr No.	Compliance Requirement (Regulations/Circulars guidelines including specific clause)	Deviations	Observation/ Remarks of the Practicing Company Secretary, if any,
	NOT APPLICABLE		

(b) The listed entity has maintained proper records under; the provisions of the above Regulations and circulars / guidelines issued there under insofar as it appears from 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 there under:

Sr.NO	Action Taken By	Detail of Violation	Detail of Action taken e.g fines, warning letter, debarment	Observation/ Remarks of the Practicing Company Secretary, if any,
	NOT APPLICABLE			





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(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr.NO	Observation of the Practicing Company Secretary, in the previous report	Observations made in the secretarial compliance report for the year ended (The years are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
		NOT APPLICABLE		

Limitations:

It is to be that due to lockdown and social distancing guidelines issued by the Ministry of Home Affairs (MHA) on different dates vide orders dated March 29, 2020, April 15, 2020 and May 01, 2020 for containment of spread of Covid-19 the above mentioned documents, registers, disclosures filed, etc. have not been physically verified by us, and as informed to us, these are being maintained by the Company at their office. While we have taken all possible steps to verify the records as made available to us by the Company through electronic medium and taken confirmation from the Company, wherever required but the audit was done subject to limitation of availability of documents.



Dipti Damani

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Practicing Company Secretary

Membership No. 53996

COP No. 20083

Place: Kolkata

Date: 07/07/2020

UDIN: A053996B000420956