

SVARAJ TRADING & AGENCIES LIMITED

Registered office: Office No. 30, 380/82 Amruteshwar Co-operative Housing Soc. Ltd., 2nd floor,
Jagannath Sunkersett Road, Mumbai, Maharashtra 400002. Ph.: 022-22053575
CIN: L51100MH1980PLC022315

May 29, 2019

The Manager
[Listing Compliance]
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400001

Dear Sir,

Scrip No.503624

**Subject: Annual Secretarial Compliance Report for the financial year ended on
March 31, 2019**

Ref.: SEBI circular CIR/CFD/CMD1 /27 /2019 dated February 8, 2019

Pursuant to aforesaid SEBI circular and in compliance with regulation 24A of the SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015, please find attached herewith Annual Secretarial Compliance Report issued by the practising Company Secretary for the financial year ended on March 31, 2019.

Please take the same on your record.

Thanking You,

Yours faithfully,
For **Svaraj Trading and Agencies Limited**

For SVARAJ TRADING & AGENCIES LTD.


Director / Auth. Signatory

Harendra Gupta
Managing Director
DIN: 05335662

Encl.: As above

To,
The Board of Directors
Svaraj Trading and Agencies Limited
[CIN: L51100MH1980PLC022315]
Office No. 30, 2nd floor 380/82 Amruteshwar
CHSL, Jagannath Sunkersett Road, Mumbai- 400002

We have been engaged by **Svaraj Trading and Agencies Limited** (hereinafter referred to as 'the Company') whose equity shares are listed on BSE Limited (Security Code: 503624) to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance of the provisions Securities and Exchange Board of India Act, 1992 ("SEBI Act"), the Securities Contracts (Regulation) Act, 1956 ("SCRA"), and all applicable Rules, Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all SEBI Act, SCRA and all applicable Rules, Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report in the format prescribed is enclosed herewith.

For **R M MIMANI & ASSOCIATES LLP**
[Company Secretaries]
[Firm Registration No.: I2001MH250300]



Manoj Mimani
(Partner)

ACS No: 17083
CP No: 11601

Place: Mumbai
Dated: May 27, 2019

**Secretarial Compliance report
of
Svaraj Trading and Agencies Limited for the year ended March 31, 2019
[Under regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015]**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **Svaraj Trading and Agencies 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 on March 31, 2019 ("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/ guidelines 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 as there was no reportable event 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 as there was no reportable event during the review period]**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **[Not applicable as there was no reportable event during the review period]**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **[Not applicable as there was no reportable event during the review period]**



(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not applicable as there was no reportable event during the review period]**

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

and circulars/guidelines issued there-under; 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

(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 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 there-under:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter	Observations/ Remarks of the Practicing Company Secretary
Nil				

(d) The listed entity has taken the following actions to comply with the observations made in previous reports **[Not applicable, as this is first review period for which report is being issued]**

For **R M MIMANI & ASSOCIATES LLP**
[Company Secretaries]
[Firm Registration No.: I2001MH250300]



Manoj Mimani
(Partner)
ACS No: 17083
CP No: 11601

Place: Mumbai
Dated: May 27, 2019