

CS Ashish Kumar Shrivastava FCS, LL.B, M.Com, PGDCA

Ashish Shrivastava & Associates Practicing Company Secretary

HIG-8, Arvind Vihar, Bagmugalia, Bhopal (M.P.) –462043 Mob. +91 7587520407; Tel: 0755-3578973 (E) <u>csashishshrivastava@gmail.com</u>

SECRETARIAL COMPLIANCE REPORT SIDH MANAGEMENT CORPORATE SERVICES LIMITED FOR THE FINANCIAL YEAR ENDED 31st MARCH, 2021

I, Ashish Kumar Shrivastava, have examined:

- a) All the documents and records made available to me and explanation provided by M/s Sidh Management corporate services Limited (CIN:- L65999DL1985PLC019846) ("the listed entity")
- b) The filing/submission made by the listed entity to the stock exchange,
- c) Website of the listed entity,
- d) Any other documents/filing, as may be relevant, which has been relied upon to make this certification,

For the year ended 31.03.2021 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 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)
- 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 (Registrars to an Issue and Share Transfer Agents) Regulations, 2018 regarding the Companies Act and dealing with client;
- j) Securities and Exchange Board of India (Depositories and Participants), Regulations, 2018;and circulars/guidelines issued there under;

and based on the above examination, I 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, except in respect of matters specified below:-

For Ashish Shrivastava & Associates

(Ashish Shrivastava)
Practicing Company Secretary



CS Ashish Kumar Shrivastava FCS, LL.B, M.Com, PGDCA

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Sr.	Compliance	Requirement	Deviations	Observation/Remarks
No.	(Regulations/circulars	/guidelines		of the Practicing
	including specific clau	ise)		Company Secretary
			None	

- b) The listed entity has maintained proper records under the provision of the above Regulations and circulars/guidelines issued there under in so far as it appears from my 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 violation	of	Details of Action taken E.g. fines, warning letter, Debarment, etc.	Observations/Remarks of the Practicing Company Secretary, if any
				None	

d) The listed entity has taken the following actions to comply with the observation made in previous report:

Sr.	Observation of	Observations made in	Actions taken	Comments o
No.	Practicing	the secretarial	by the listed	Practicing Company
	Company	compliance report for	entity, if any	Secretary on the
	Secretary in the	the year ended. (the		actions taken by the
	previous reports	years are to be		listed entity
		mentioned)		

For Ashish Shrivastava & Associates

Company Secretaries

For Ashish Shrivastava & Associates

Ashish Kumar Shrivastavahish Shrivastava)
(Proprietor)
Practicing Company Secretary

FCS: 8675 CP: 24351

Date: 26.05.2021 Place: Bhopal

UDIN:-F008675C000374777

* Disclaimer Note: During this challenging time of COVID 19 outbreak this report has been undertaken to the best of my capability based on the e-verification of scans, soft copies, information, confirmations, records and documents made available to us by the Management.