



**TARIQ BUDGUJAR & CO.
COMPANY SECRETARIES**

**002, Building No. 05, Radiant Society Back Road, Mira Road East Mumbai
401107 Email: cstariqbudgujar@gmail.com**

**SECRETARIAL COMPLIANCE REPORT OF M/S SEJAL GLASS LIMITED
FOR THE YEAR ENDED 31ST MARCH, 2021**

To,
The Board of Directors,
Sejal Glass Limited
3rd Floor, 173/174,
Sejal Encasa, Opp. Bata Showroom,
S V Road, Kandivali West,
Mumbai- 400067

I MOHAMMED TARIQ BUDGUJAR, Proprietor of M/S TARIQ BUDGUJAR & CO. have examined:

- a) all the documents and records made available to us and explanation provided by **Sejal Glass 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 31st March, 2021 (“FY 2020-21”) 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 thereunder 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 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; **(Not applicable to the Company during the Audit Period)**

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; **(Not applicable to the Company during the Audit Period)**

(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 Nonconvertible 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) other regulations as applicable and circulars/ guidelines issued there under; 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 there under, **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
1	Non submission of Corporate Governance Report with BSE Ltd, as per provisions of Regulation 27 (2) of SEBI (LODR) Regulation, 2015.	Non availability of suitable platform to file the same.	The Listed Entity has delayed in filing compliance with BSE under Regulation 27 (2) of SEBI (LODR) Regulation, 2015

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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:

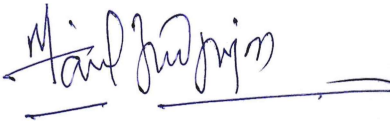
Sr. No	Action taken by	Details of violation	Details of action taken E.g. Fines, Warning letter, debarment, etc.	Observations / Remark of the Practicing Company Secretary, if any.
1	BSE Limited	Non filing of Corporate Governance Report with BSE as per Regulation 27 (2) of SEBI (LODR) Regulations, 2015	Imposed fine / Penalty of Rs. 75,520/- under regulation 27 of SEBI (LODR), Regulation, 2015.	The Listed Entity has written a letter to BSE dated May 26, 2021, informing the Company being under Corporate Insolvency Resolution Process (CIRP) during the period under the review and also explanation the valid reason for non-filing of CG Report. Further request for waiver of the fine has also been made under the letter mentioned here above.

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

Sr. No.	Observation of Practicing Company Secretary in the Previous Report.	Observation made in the secretarial compliance report	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the Action taken by the listed entity.

Note: It is to be noted that due to lockdown and social distancing guidelines issued by the Government authorities for containment of spread of COVID-19 pandemic, the above-mentioned documents, registers, forms etc have not been physically verified by us, as being maintained by the Company at its registered office. While we have taken all possible steps to verify these records electronically and taken confirmation from the Company, whenever required but the audit for Secretarial Compliance Report is subject to limitation of availability of documents.

**For TARIQ BUDGUJAR & CO.,
COMPANY SECRETARIES**



MOHAMMED TARIQ BUDGUJAR

(Proprietor)

ACS: 47471 COP: 17462

Place: Mumbai

Date: 30.06.2021

UDIN: A047471C000546486