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Sanco Trans Limited



CIN:L60220TN1979PLC007970 S.T. TOWER, New Number: 24 & 25, Jehangir Street (2nd Line Beach Road), Chennai 600001.INDIA.

May 30, 2022

The Department of Corporate Relations BSE Limited PJ Towers Dalal Street Mumbai – 400 001

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report

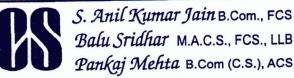
Pursuant to SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find attached the Annual Secretarial Compliance report from Practicing Company Secretary for the year ended March 31, 2022.

Thanking you,

Sincerely,
For SANCO TRANS LIMITED

PRASANNA N
Company Secretary

Encl: As above



SECRETARIAL COMPLIANCE REPORT OF M/S. SANCO TRANS LIMITED FOR THE FINANCIAL YEAR ENDED 31.03.2022

We, A.K. Jain & Associates, have examined:

- a) all the documents and records made available to us and explanation provided by M/s. **SANCO TRANS LIMITED** ("the Listed Entity"),
- b) the filings/ submissions made by the listed entity to the Stock Exchange,
- 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 31.03.2022 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
- 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). The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

- b). The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c). The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d). The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- e). The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;

and circulars/ guidelines issued thereunder;

We further report that, the following Regulations / Guidelines were not applicable to the Company during the audit period:-

- a). The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- b). The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- c). The Securities and Exchange Board of India (Delisting of Equity Shares)Regulations, 2021;
- d). The Securities and Exchange Board of India (Issue and Listing of Debt Securities)
 Regulations, 2008;
- e). The Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; and
- f). The Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018.

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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 thereunder, except in respect of matters specified below:-

S.	Compliance	Deviations	Observations/ Remarks of the
No	Requirement		Practicing Company Secretary
	(Regulations/ circulars /		
	guidelines including		
	specific clause)		
1	Regulation 17(1) read	Delay of 107 days in	The Company has not appointed
	with Regulation 25(6) of	filling up of the vacancy	an Independent Director in place
	Securities Exchange	caused by the cessation	of the vacancy caused by the
	Board of India (Listing	of Mr. T R	cessation of Mr. T R
	Obligations and	Chandrasekaran	Chandrasekaran.
	Disclosure Requirements)	Independent Director	
	Regulations, 2015 –	due to completion of	The Company appointed Mr.
		his tenure.	Bharat Venkat Epur with effect
	Composition of Board of		from 31.03.2022 to fill the
	Directors with		vacancy caused by cessation of
	appointment of		Mr. T R Chandrasekaran on
	adequate number of		14.09.2021 and complied with the
	Independent Directors		composition of Board of Directors
	and filing up of vacancy		as prescribed in Regulation 17(1)
	of the Independent		of SEBI (LODR) Regulations, 2015.
	Director.		

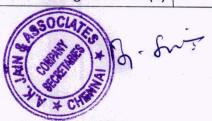
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from our examination of those records.
- c) The following are the details of actions taken against the listed entity/ its Promoters/ Directors/ 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 thereunder:

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S.N o	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 (Stock Exchange)	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director for the Quarter ended December, 2021 and March, 2022.	of Rs.1,06,200/- (Including GST) and Rs.5,25,100/- (Including GST) respectively in accordance with the SEBI Circular SEBI / HO / CFD /	The Company appointed Mr. Bharat Venkat Epur with effect from 31.03.2022 to fill the vacancy caused by cessation of Mr. T R Chandrasekaran on 14.09.2021 and complied with the composition of Board of Directors as prescribed in Regulation 17(1) of SERIA (1008)
	3	őv.	CMD / CIR / P / 2020 / 12 dated January 22, 2020	SEBI (LODR) Regulations, 2015.

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.	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Regulation	For Financial	The Company has appointed	The action
	17(1) read with	Year ended 31 st	Independent Director Mr. P R	taken by the
	Regulation	March, 2021	Renganath with effect from	Company as
	25(6) of		19.11.2020 to fill the vacancy	reported
	Securities		caused by cessation of Mr. R	herein is self-
	Exchange		Raghavan on 18.08.2020 and	explanatory.
	Board of India		complied with the	
	(Listing		composition of Board of Directors	
	Obligations		as prescribed in Regulation 17(1)	



and Disclosure	of Composition of Board
Requirements)	SEBI(LODR)Regulations, 2015.
Regulations,	
2015 –	The Stock Exchange vide its Notice
	Reference-SOP-CReview-Feb2021
Composition of	dated 15.02.2021 has levied a fine
Board of	of Rs.5,900/- (Including GST) in
Directors with	accordance with the SEBI Circular
appointment	SEBI/HO/CFD/CMD/CIR/P/2020/12
of adequate	dated January 22, 2020 and the
number of	Company paid the same.
Independent	
Directors and	
filing up of	
vacancy of the	
Independent	
Director.	

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Company Secretaries

For A.K.JAIN& ASSOCIATES

Place: Chennai Date:30.05.2022

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BALU SRIDHAR

Partner M.No. F5869

C.P. No. 3550

UDIN: F005869D000424199