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GSTIN : 33AAACS7690F1ZB

SANCO GROUP  
SINCE  
1956

**Sanco  
Trans  
Limited**



CIN : L60220TN1979PLC007970  
S.T. TOWER, New Number : 24 & 25,  
Jehangir Street (2<sup>nd</sup> Line Beach Road),  
Chennai 600 001, INDIA.

July 28, 2020

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

Dear Sir/Madam,

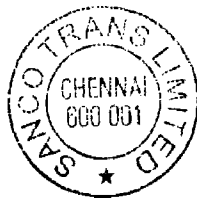
Sub: Annual Secretarial Compliance Report

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, 2020.

Thanking you,

Sincerely,  
For SANCO TRANS LIMITED

PRASANNA N  
Company Secretary



Encl: As above

***“Service And Trust - Part Of Our Tradition”***

■ Container Freight Station (CFS) ■ Terminal Operations ■ Stevedoring & Break Bulk ■ Empty Container Yard / Repair ■ Public Bonded Warehouse  
■ Customs Broker ■ Warehousing & Distribution ■ Transport ■ Freight Forwarding (Air/Sea) ■ Multimodal Transport Operator (MTO)



**SECRETARIAL COMPLIANCE REPORT**  
**OF M/S. SANCO TRANS LIMITED**  
**FOR THE FINANCIAL YEAR ENDED 31.03.2020**

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

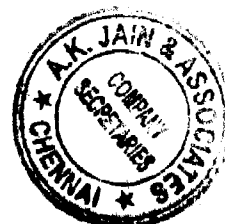
- a) all the documents and records made available to us and explanation provided by M/s. **SANCO TRANS LIMITED** ("the Listed Entity"),
- b) the filings/ submissions made by the listed entity to the Stock Exchange,
- c) website of the Listed Entity,
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.03.2020 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
- b) 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;

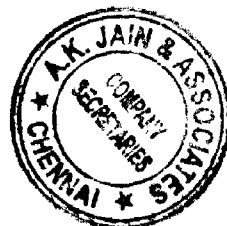
and circulars/ guidelines issued thereunder;

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) Regulations, 2014;
- c). The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009;
- 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.

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:-

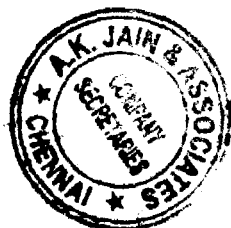


*[Handwritten signature]*

S. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 34 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 -  Submission of Annual Report to Stock Exchanges along with Notice of Annual General Meeting not later than the day of commencement of dispatch to its shareholders.	Delay of 12 days in submission of Annual Report to Stock Exchange.	The Stock Exchange vide its Notice LIST/COMP/523116/Reg. 34-Mar19/206/2019-20 dated 15.10.2019 has levied a total fine of Rs.28,320/- (Including GST). However, the aforesaid fine levied was later withdrawn by the Stock Exchange on 07.01.2020 considering the submission made by the Company and similar requests received from other Companies.

- 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:

S.No	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)	Delay in submission of Annual Report as prescribed under Regulation 34 of SEBI (LODR)	The Stock Exchange vide its Notice LIST/COMP/523116/Reg. 34-Mar19/206/2019-20 dated 15.10.2019 has levied a total fine of Rs.28,320/- (Including GST).	The fine levied was withdrawn by the Stock Exchange considering the submission made by the Company and similar requests received from other Companies and advised the Company to



		Regulations, 2015.	The aforesaid fine levied was later withdrawn by the Stock Exchange on 07.01.2020.	ensure utmost caution in future and ensure compliance with the provisions of SEBI (LODR) Regulations, 2015.
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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. (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

Place: Chennai  
Date: 07.07.2020

For A.K.JAIN & ASSOCIATES  
Company Secretaries



*B. Sridhar*

**BALU SRIDHAR**

Partner

M.No. F5869

C.P. No. 3550

UDIN:F005869B000424463