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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.

June 30, 2021

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, 2021.

Thanking you,

Sincerely,
For SANCO TRANS LIMITED

PRASANNA N
Company Secretary

Encl: As above

“Service And Trust - Part Of Our Tradition”

A. K. JAIN & ASSOCIATES
C O M P A N Y S E C R E T A R I E S



S. Anil Kumar Jain B.Com., FCS
Balu Sridhar M.A.C.S., FCS., LLB
Pankaj Mehta B.Com (C.S.), ACS

SECRETARIAL COMPLIANCE REPORT
OF M/S. SANCO TRANS LIMITED
FOR THE FINANCIAL YEAR ENDED 31.03.2021

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,

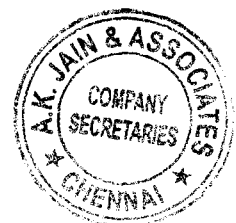
for the year ended 31.03.2021 in respect of compliance with the provisions of:

- a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued 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;

S. Anil Kumar Jain



- 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.

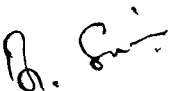

And based on the above examination, We hereby report that, during the Review Period:

- 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:-



S. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	<p><i>Regulation 17(1) read with Regulation 25(6) of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 -</i></p> <p>Composition of Board of Directors with appointment of adequate number of Independent Directors and filing up of vacancy of the Independent Director.</p>	<p>Delay of 1 day in filling up of the vacancy caused by the cessation of Mr. R Raghavan Independent Director due to completion of his tenure.</p>	<p>The Company has appointed Independent Director Mr. P R Renganath with effect from 19.11.2020 to fill the vacancy caused by cessation of Mr. R Raghavan on 18.08.2020 and complied with the composition of Board of Directors as prescribed in Regulation 17(1) of SEBI (LODR) Regulations, 2015.</p> <p>The Stock Exchange vide its Notice Reference-SOP-CReview-Feb2021 dated 15.02.2021 has levied a fine of Rs.5,900/- (Including GST) in accordance with the SEBI Circular SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020 and the Company paid the same.</p>

- 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)	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director for the Quarter ended December, 2020.	The Stock Exchange vide its Notice Reference-SOP-CReview-Feb2021 dated 15.02.2021 has levied a fine of Rs.5,900/- (Including GST) in accordance with the SEBI Circular SEBI/HO/CFD/CMD/CIR/P/2020/12 dated January 22, 2020	The Company has appointed Independent Director Mr. P R Renganath with effect from 19.11.2020 and complied with the composition of Board of Directors as prescribed in Regulation 17(1) of 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 34 of Securities Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015: Delay in submission of Annual Report to Stock Exchanges	For Financial Year ended 31 st March, 2020	The Company had belatedly uploaded the Annual Report and the delay was due to inadvertence. Further 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 action taken by the Company as reported herein is self-explanatory.

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	along with Notice of Annual General Meeting.		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	
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Place: Chennai
Date: 30.06.2021

For A.K.JAIN & ASSOCIATES
Company Secretaries



A handwritten signature in black ink, appearing to read "B. Sridhar".

BALU SRIDHAR

Partner

M.No. F5869

C.P. No. 3550

UDIN: F005869C000545793