



S.G. KANKANI & ASSOCIATES
COMPANY SECRETARIES

SECRETARIAL COMPLIANCE REPORT
OF
M/S SARDA ENERGY & MINERALS LIMITED
FOR THE YEAR ENDED MARCH 31, 2022

TO,
M/S SARDA ENERGY & MINERALS LIMITED,
CIN: L27100MH1973PLC016617
73-A, CENTRAL AVENUE,
NAGPUR (MS) 440018

I Kamlesh Ojha, Partner of M/s S.G. Kankani & Associates, Company Secretaries, Raipur (Chhattisgarh) have examined:

- all the documents and records made available to us and explanation provided by M/s Sarda Energy & Minerals Limited (hereinafter referred to as "the listed entity"),
- the filings/submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2022 ("Review Period") in respect of compliance with the provisions of:

- 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 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (***Not Applicable to the listed entity during the Review Period***)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (***Not Applicable to the listed entity during the Review Period***)

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SARDA ENERGY & MINERALS LIMITED - SECRETARIAL COMPLIANCE REPORT- FY 2021-22

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- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the listed entity during the Review Period)**
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **(Not Applicable to the listed entity during the Review Period)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulation 2018;

and circulars/guidelines issued thereunder and based on the above examination, I hereby report that, during the Review Period:

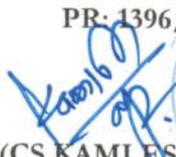
- a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued there under.
- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from my examination of those records.
- c) During the previous financial year 2020-21, there was delay of 202 days in appointment of Independent Women Director on the Board of Directors of the Company in pursuance of the provisions of Regulation 17(1)(a) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. With respect to the above non-compliance, BSE Ltd., in August, 2021, had imposed a fine of Rs. 1,12,100/- (including GST), which was duly paid by the Company in August, 2021 itself. Except the above, there are no 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.

PLACE: RAIPUR (C.G.)
DATE: 30.05.2022

FOR, S.G. KANKANI & ASSOCIATES
COMPANY SECRETARIES

FRN: P1998CG012600

PR: 1396/2021


(CS KAMLESH OJHA)

PARTNER

FCS NO.: 10807

CP NO.: 14660

UDIN: F010807D000425760