SAL AUTOMOTIVE LIMITED

(Formerly known as Swaraj Automotives Ltd.)

Works:

Kakrala Rd. Nabha-147201 Distt. Patiala, Punjab (INDIA) Ph.: 01765-222163 & 221286

E-mail: info@swarajautomotive.com CIN: L45202PB1974PLC003516



02/SP/BSE 30th May 2022

The General Manager Corp. Relationship Deptt. BSE Ltd.

1st. Floor, New Trading Ring, Rotunda Building, P J Towers, Dalal Street, Fort, Mumbai

Sub.: Annual Secretarial Compliance Report for the year ended 31st March 2022

Dear Sir,

In compliance with provisions of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, we enclose Annual Secretarial Compliance Report for the financial year ended 31st March, 2022 issued by M/s A. Arora & Co., Company Secretaries dated 28th May, 2022.

You are requested to kindly take the same on record.

Thanking You,

Yours Faithfully,

For SAL Automotive Limited

Gagan Kaushik

(Company Secretary)

F8080

Works Dharwad: 183 / I, Belur Industrial Area, Dharwad, Distt. Dharwad, Karnataka -580011

Regd. Office:

C-127, IV Floor, Satguru Infotech, Phase - VIII, Industrial Area, SAS Nagar (Mohali), Punjab - 160071

Website:

www.swarajautomotive.com



AJAY K. ARORA LL.B., FCS, IP GST: 04ADSPA8498H1Z3

A. ARORA & CO.

Company Secretaries

Insolvency Professional

S.C.O. 64-65, 1ST FLOOR, SECTOR 17-A, MADHYA MARG, CHANDIGARH-160 017

Ph.: (O) 2701906 MOBILE: 98140-06492 E-MAIL: ajaykcs@gmail.com

Secretarial compliance report of SAL Automotive Limited (Formerly Swaraj Automotives Limited) for the year ended March 31, 2022

To,

SAL Automotive Limited, (Formerly Swaraj Automotives Limited)
C-127, 4th Floor, Sat Guru Infotech Industrial Area, Phase VIII, SAS Nagar, Mohali, Punjab 160062.

We, A. Arora & Co. have examined:

- (a) all the documents and records made available to us and explanation provided by SAL Automotive Limited (Formerly Swaraj Automotives 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 March 31, 2022 ("Review Period") 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) 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 Review Period.
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018: Not applicable as there was no instance of Buy-Back of its securities during the Review Period.
- (e) Securities And Exchange Board Of India (Share Based Employee Benefits) Regulations, 2014 and Securities And Exchange Board Of India (Share Based Employee Benefits And Exchange Board Of India (Share Based Employee Benefits And Exchange Board Of India (Share Based Employee Benefits And Exchange Board Of India (Share Based Employee Benefits)

- Sweat Equity) Regulations, 2021: Not applicable as the company did not provide share based employee benefits covered under these regulations during the Review Period;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: Not applicable as the company has not issued any debt securities during the Review Period.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities)
 Regulations, 2021: Not applicable as the company has not issued any such securities during the Review Period
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021: Not applicable as the company has not delisted any securities from any stock exchange during the Review Period
- (i) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993- Not applicable as the company is not registered as Registrar to an Issue and Share Transfer Agent during the review period.
- (j) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (k) Securities and Exchange Board of India (Depositories and Participant) Regulations, 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 thereunder, 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
		NIL	

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder inso 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:

Sr. 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.
			NIL	



(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	
		N.A.		

Place: Chandigarh Date: 28.05.2022

UDIN: F002191D000421170

For A. Arora & Co.

(Proprietor) FCS No.: 2191 C P No.: 993