



Dhiren R. Dave

B.Com., LL.B., FCS, AICS (U.K.)

COMPANY SECRETARY

B-103, International Commerce Centre, Near Kadiwala School, Ring Road, Surat-395 002, (Gujarat) INDIA.
Tele : 0261-2460903, 24751122 (M) 98241 15061
Website : www.drdcs.net E-mail : drd@drdcs.net

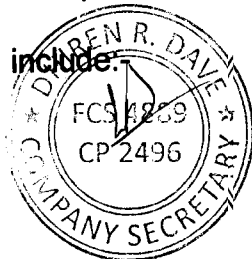
**Secretarial Compliance Report of Sumeet Industries Limited
for the Financial Year Ended 31st March, 2019**

To
The Members,
Sumeet Industries Limited
504, Trividh Chambers,
Opp. Fire Station, Ring Road,
Surat – 395 002

I Dhiren R Dave, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to us and explanation provided by Sumeet Industries 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 2019 (“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 there under; and
 - (b) the Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under 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 there under, 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;
- (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; - There are no events occurred during the year which attracts provisions of these regulations hence not applicable.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - There are no events occurred during the year which attracts provisions of these regulations hence not applicable.
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - There are no events occurred during the year which attracts provisions of these regulations hence not applicable.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; - There are no events occurred during the year which attracts provisions of these regulations hence not applicable.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;



- (i) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 - There are no events occurred during the year which attracts provisions of these regulations hence not applicable.

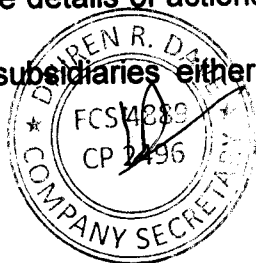
and circulars/ guidelines issued there under and based on the above examination, I hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, 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
1	Regulation 46(2)(s) of SEBI (Listing of Obligations and Disclosure Requirements) Regulations, 2015.	Separate audited financial statements of subsidiary not uploaded.	Instructed to comply immediately.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far as it appears from my 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

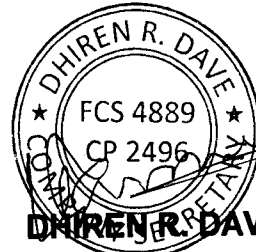


under the Standard Operating Procedures issued by SEBI through various circulars)
 under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under.

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.
1	Securities and Exchange Board of India	Section 11B of SEBI Act, 1992	Show cause notice dated 05.04.2018.	Investigation/Litigations are still on with regard to the subject matter of SEBI order dated 21.05.2014.

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable being first year of reporting.

Place: SURAT
 Date: 30.05.2019



DHIREN R. DAVE
COMPANY SECRETARY
FCS:4889
CP :2496