

## SANGHVI MOVERS LIMITED

Regd. Office : Survey No. 92, Tathawade,  
Taluka - Mulshi, Pune, Maharashtra - 411033, INDIA  
Tel. : 8669674701/2/3/4, 020-27400700  
E-mail : sanghvi@sanghvicranes.com  
Web. : www.sanghvicranes.com  
CIN No. : L29150PN1989PLC054143



REF: SML/SEC/SE/22-23/13

Date: 30<sup>th</sup> May 2022

### By Online filing

BSE Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai- 400001  
Kind Attn.: Ms. Pooja Sanghvi - Relationship Manager  
Ref: Code No. 530073

National Stock Exchange of India Limited  
Exchange Plaza,  
Bandra Kurla Complex  
Bandra East, Mumbai – 400051  
Kind Attn.: Mr. K. Hari – Asst. Vice President  
Symbol: SANGHVIMOV

Sub: Submission of Secretarial Compliance Report

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, Please find enclosed herewith the Annual Secretarial Compliance Report of the Company, for the year ended 31<sup>st</sup> March 2022, issued by Mr. Hrishikesh S. Wagh, Partner, Kanj & Co. LLP, Company Secretaries, Pune.

Kindly take the same on record and acknowledge.

Thanks & Regards,

For Sanghvi Movers Limited

Rajesh P. Likhite  
Company Secretary &  
Chief Compliance Officer



Encl.: As above

**SECRETARIAL COMPLIANCE REPORT OF SANGHVI MOVERS LIMITED**  
**for the year ended on 31<sup>st</sup> March 2022**

We have examined:

- (a) all the documents and records made available to us and explanation provided by Sanghvi Movers 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 on 31<sup>st</sup> March 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 Listed entity during 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 to the Listed entity during the review period;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; Not Applicable to the Listed entity during the review period;
- (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 review period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) And (other regulations as applicable) and circulars/ guidelines issued thereunder;
1. SEBI Circular CIR/CFD/CMD1/114/2019 dated 18<sup>th</sup> October 2019 for the terms of appointment of Statutory Auditor to cover the conditions specified under Clause 6(A) and 6(B) of the said circulars not applicable during the review period;

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 and subject to the observations stated as follows: -

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing company Secretary
1.	Events which shall be disclosed without any application of the guidelines for materiality within 24 hours from the occurrence of the event. (Regulation (30(4)) -)	Intimation of alteration of Articles of association approved in the AGM was to be intimated to the stock exchanges by 12.30 PM on 14/08/2021 whereas intimation was given to Bombay Stock Exchange (BSE) at 13.49 PM on 14/08/2021.	There was a delay in reporting to the stock exchange  As per the explanation given by the management, the delay was on account of a technical glitch at the time of submission.
2.	Outcome of board meeting - Outcome of board meeting to be submitted to the stock exchange within 30 minutes from conclusion of the meeting. (Regulation (30(6)) Disclosure of events)	The board meeting held on 27/05/2021 concluded at 2.05 PM however, the intimation to the BSE was filed at 2.37 PM	There was a delay of in the disclosure given to BSE. As per the explanation given by the management, the delay was on account of a technical glitch at the time of submission.
3.	Nomination & remuneration committee (Regulation 19(3A)) - The nomination and remuneration committee shall meet at least once in a year.	The Company has not convened and held a meeting of the Nomination and remuneration Committee during the financial year 2021-2022.	The company has not complied with Regulation 19(3A) to that extent. As per the explanation given by the management the meeting was not held due to uncertain times & challenges faced on account of second wave of COVID-19 and restrictions and lock down imposed.

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

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
Not Applicable				

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March 2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
-	-	-	-	-

**For KANJ & Co. LLP,  
 Company Secretaries,**

  
 Hrishikesh S Wagh  
 Partner  
 FCS: 7993  
 C P No: 9023  
 UDIN: F007993D000388923



Date: 25/05/2022  
 Place: Pune