



SONAL

MERCANTILE LIMITED

Registered Office: 365, Vardhman Plaza, III
Floor, Sector-3, Rohini, New Delhi-110085
CIN: L51221DL1985PLC022433
E-mail Id: sonalmercantile@yahoo.in
Website: www.sonalmercantile.in
Contact No. 011-49091417

Date: July 31, 2020

To
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalai Street,
Fort Mumbai - 400001

BSE Scrip Code - 538943

Dear Sir / Madam,

Sub.: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2020

Pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 and SEBI Circular 'SEBI/HO/CFD/CMD1/CIR/P/2020/109' dated June 25, 2020, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2020, issued by M/s Mayank Panwar & Co., Practising Company Secretaries.

Kindly take the same on your records.

Thanking you,

For and on behalf of
SONAL MERCANTILE LIMITED

Kush

Mishra



Kush Mishra
Company Secretary



MAYANK PANWAR & CO.

Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF SONAL MERCHANTILE LIMITED FOR THE YEAR ENDED MARCH 31, 2020

I, Mayank Singh Panwar have examined:

- (a) all the documents and records made available to us and explanation provided by **SONAL MERCHANTILE 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, 2020 ("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;
- (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;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and circulars/ guidelines issued thereunder, and based on the above examination I hereby report that, during the Review Period:





MAYANK PANWAR & CO.
Company Secretaries

- (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	Nil	Nil

- (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 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 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	Nil	Nil	Nil

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

Place: New Delhi
Date: 31.07.2020



Mayank S.P.

MAYANK SINGH PANWAR
ACS No.: A41991
C P No.: 15643
UDIN: A041991B000536421