



# 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: June 30, 2021

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, 2021**

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, we are submitting herewith the Annual Secretarial Compliance Report of the Company for the year ended March 31, 2021, issued by M/s Shobhit Mahesh and Associates, Practising Company Secretaries.

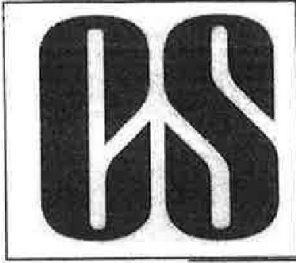
Kindly take the same on your records.

Thanking you,

For and on behalf of  
**SONAL MERCANTILE LIMITED**

  
**Vikram Goyal**  
Whole Time Director  
Din: 00381115





# SHOBHIT MAHESH AND ASSOCIATES

## Practicing Company Secretary

Ref: SMA/PCS/21-22/01

Date: 30-06-2021

### SECRETARIAL COMPLIANCE REPORT of SONAL MERCANTILE LIMITED (For the year ended 31st March, 2021)

We, M/s Shobhit Mahesh & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Sonal Mercantile Limited** ("hereinafter referred to as "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 31<sup>st</sup> March, 2021 ("Review Period") in respect of compliance with the provisions of:

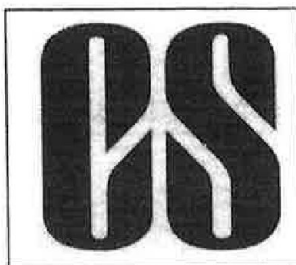
- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities 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;

Off. Add: 2/1027, Buddhi Vihar, Avas Vikas Colony, Near LIC Office, Moradabad- 244001 (Uttar Pradesh)  
Branch Office Address: 201 A, Top Floor, Street No. 3, Govindpuri, Kalkaji, New Delhi-110019  
MOB- 9711456299, 9911456299 E-MAIL: [csshobhit.mahesh@gmail.com](mailto:csshobhit.mahesh@gmail.com):





# SHOBHIT MAHESH AND ASSOCIATES

## Practicing Company Secretary

- (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;
- (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
	NA		

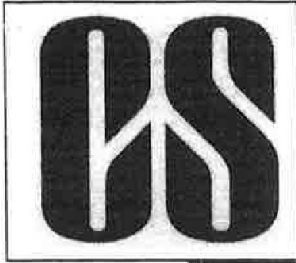
- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ 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.
	NA			

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:


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# SHOBHIT MAHESH AND ASSOCIATES

## Practicing Company Secretary

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	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA			

We further report that during the Review Period, there was no event of appointment/reappointment/resignation of statutory auditor of the Company and the Company has suitably modified the terms of appointment of its existing auditor. In this regard, we report that the Company has complied with Para 6(A) and 6(B) of Circular No. CIR/CFD/CMDI/114/2019 dated October 18, 2019.

Thanking You.

For Shobhit Mahesh & Associates  
Company Secretaries



Shobhit Mahesh  
Mem No.: 42278  
Cop No: 22713

UDIN: A042278C000557771

Date: 30/06/2021  
Place: New Delhi