



**CS. IRA BAXI**  
B.Sc., FCS, PGDMSM  
Practicing Company Secretary

**CORPORATE TOWER**  
PLOT NO: 21 & 22  
BEHIND BANK OF MAHARASHTRA  
SECOND PULIYA COMMERCIAL CENTRE  
CHOPASNI HOUSING BOARD, JODHPUR  
PHONES: 98285 34248, 98291 34248  
E- mail: fcsirabaxi@gmail.com, irabaxi@rediffmail.com

To,  
The Board of Directors,  
Somi Conveyor Beltings Limited  
CIN: L25192RJ2000PLC016480  
4F-15, Oliver House,  
New Power House Road,  
Jodhpur, Rajasthan - 342003

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2020-2021**

I have been engaged by Somi Conveyor Beltings Limited (hereinafter referred to as the Company') bearing CIN: L25192RJ2000PLC016480 whose equity shares are listed on BSE Limited and National Stock Exchange of India Limited to conduct and audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI's Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with the provisions of all the applicable SEBI Regulations and circulars/guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

My responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

My audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

Place: Jodhpur  
Date: 24<sup>th</sup> June, 2021

Signature:   
  
IRA BAXI  
Practicing Company Secretary  
FCS No.: 5456; C P No.: 4712  
UDIN: F005456C000507485



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**Secretarial compliance report of SOMI CONVEYOR BELTINGS LIMITED for the year ended  
31<sup>st</sup> March, 2021**

To,  
**Somi Conveyor Beltings Limited**

I Ira Baxi, Practicing Company Secretary has examined:

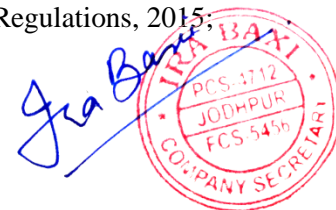
- all the documents and records made available to me and explanation provided by SOMI CONVEYOR BELTINGS LIMITED (“the listed entity”),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has 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 :

- the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued thereunder; and
- 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:-

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
  - Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **Not Applicable to the Company during the Financial Year under review;**
  - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
  - Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **Not Applicable to the Company during the Financial Year under review;**
  - Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable to the Company during the Financial Year under review;**
  - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable to the Company during the Financial Year under review;**
  - Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable to the Company during the Financial Year under review;**
  - 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:

a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.

(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:

<b>Sr No</b>	<b>Action taken by</b>	<b>Details of violation</b>	<b>Details of action taken E.g. fines, warning letter, debarment, etc</b>	<b>Observations/ remarks of the Practicing Company Secretary, if any.</b>
<b>NIL</b>				

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

<b>Sr. No.</b>	<b>Observations of the Practicing Company Secretary in the previous reports</b>	<b>Observations made in the secretarial compliance report for the year ended...(The years are to be mentioned)</b>	<b>Actions taken by the listed entity, if any</b>	<b>Comments of the Practicing Company Secretary on the actions taken by the listed entity</b>
1.	Non-submission of the financial results within period prescribed under regulation 33 of SEBI(LODR) Regulation, 2015	For FY 2018-19, Penalty has been paid in part by the company vide cheque deposited in favour of BSE & NSE on 30/06/2018	Complied with the provisions of regulation 33 of SEBI(LODR) Regulation, 2015 and paid penalty to: BSE – Rs. 2,33,404/-; NSE – Rs. 2,33,401/-	-

**Place: Jodhpur**  
**Date: 24<sup>th</sup> June, 2021**

**Signature:**

**IRA BAXI**

**Practicing Company Secretary**  
**FCS No.: 5456; C P No.: 4712**  
**UDIN: F005456C000507485**

