

General information about company	
Scrip Code*	532029
NSE Symbol	
MSEI Symbol	
ISIN	INE325D01025
Name of the listed entity	SINDHU TRADE LINKS LIMITED
Date of start of financial year	01-04-2021
Date of end of financial year	31-03-2022
Date of Report	30-05-2022
Whether any observations reported by the Secretarial Auditor	Yes
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.	Yes
Any actions taken against the listed entity/its promoters/directors/its material subsidiaries either by SEBI or by stock exchanges (including under the Standard operating procedures issued by SEBI through various circulars).	Yes
Is there any observation made in the previous report	Yes
Name of the Certifying Firm	ANAMIKA BHOLA & ASSOCIATES
Name of the practicing Company Secretary issuing the report	ANAMIKA BHOLA
Membership Type	ACS
ACS/FCS No.	26132
CP No.	23474
Place	GURUGRAM
Date	30-05-2022

Regulations			
Sr No	Regulation	Applicability during the period under review (Yes/No)	Any Observation (Yes/No)
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Yes	Yes
2	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018	No	No
3	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	No	No
4	Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018	No	No
5	Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014	No	No
6	Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008	No	No
7	Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013	No	No
8	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	No	No
9	Specify any other regulation applicable to the Company		

Table I					
Sr No	Regulation Name/ SEBI Circular number	Regulation Number/ circular dated	Compliance requirement (regulations/circulars/ guidelines including specific clauses)	Deviations	Observation details
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33(3)	ANNUAL RESULTS TO BE FILED WITHIN 60 DAYS OF THE CLOSURE OF THE FINANCIAL YEAR	RESULTS WERE FILED ON 31.08.2021	DUE TO COVID PANDEMIC THE FINALIZATION OF ACCOUNTS COULD NOT BE COMPLETED ON TIME.
2	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	33(3)	QUARTERELY RESULTS TO BE FILED WITHIN 45 DAYS OF THE CLOSURE OF THE QUARTER	RESULTS WERE FILED ON 29.09.2021	DUE TO COVID PANDEMIC THE FINALIZATION OF ACCOUNTS COULD NOT BE COMPLETED ON TIME.
3	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17(1)	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	THE COMPOSITION OF DIRECTORS WERE RECTIFIED ON 29.09.2021	DUE TO COVID PANDEMIC THE APPOINTMENT OF SIXTH DIRECTOR COULD NOT BE COMPLETED ON TIME.
4	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	17(1)	Non-compliance with the requirements pertaining to the composition of the Board including failure to appoint woman director	THE COMPOSITION OF DIRECTORS WERE RECTIFIED ON 29.09.2021	DUE TO COVID PANDEMIC THE APPOINTMENT OF SIXTH DIRECTOR COULD NOT BE COMPLETED ON TIME.

Table II				
Sr No	Action taken by	Details of violation	Details of action taken Eg fines, warning letter, debarment Etc	Observations/remarks of the practising Company Secretary, if any
1	BSE	Regulation 33 for Financial year ended March, 2021	Penalty of Rs 5,15,000/- Imposed by Stock Exchange	Standalone/Consolidated Financial results for the financial year ended 31.03.2021 were not filed within the prescribed time.
2	BSE	Regulation 33 for Financial year ended June, 2021	Penalty of Rs 2,20,000/- Imposed by Stock Exchange	Standalone and Consolidated Financial results for the Quarter ended 30th June, 2021 were not submitted within the prescribed time.
3	BSE	Regulation 17(1) for the Quarter ended June, 2021	Penalty of Rs 4,55,000/- Imposed by Stock Exchange	The Company has not complied provisions of Regulation 17(1) composition of Board of Directors till the month end June, 2021
4	BSE	Regulation 17(1) for the Quarter ended September, 2021	Penalty of Rs 4,50,000/- Imposed by Stock Exchange	The Company has not complied provisions of Regulation 17(1) composition of Board of Directors till the month end Sept, 2021

Table III				
Sr No	Regulation Name/ SEBI Circular number*	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
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Standalone and Consolidated Financial results for the financial year ended 31.03.2020 were not filed within the prescribed time or extended time given by SEBI due to COVID -19 Pandemic.	31.03.2020	Management of the Company has ensured to file the Annual Results on time in future.
2	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Consolidated Financial results for the Quarter ended 30th Sept, 2020 were not submitted within the prescribed time.	30.09.2020	Management of the Company has ensured to file the Annual Results on time in future.
3	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	Related Party Transaction for the half year ended 30.09.2020 were not submitted to the Stock Exchange within the time prescribed by SEBI(LODR), 2015	30.09.2020	Management of the Company has ensured to file the RPT on time in future.

