

Phone No.: 30767700

Fax No.: 24902363

# THE SWASTIK SAFE DEPOSIT & INVESTMENTS LIMITED

CIN: L65190MH1940PLC003151

Regd. Office: 4<sup>th</sup> Floor, Piramal Tower Annexe, Ganpatrao Kadam Marg, Lower Parel, Mumbai – 400013

27<sup>th</sup> May, 2022

The Secretary,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Fort, Mumbai - 400 001

Dear Sir,

Scrip Code: BSE: 501386

**Sub.: Annual Secretarial Compliance Report u/r 24(A) of SEBI LODR Regulations, 2015**

Please find enclosed herewith the Annual Secretarial Compliance Report dated 26<sup>th</sup> May, 2022 of M/S. N. L. Bhatia & Associates, Practicing Company Secretaries as required under Regulation 24(A) of SEBI LODR Regulations, 2015 for the financial year ended 31<sup>st</sup> March, 2022.

Kindly acknowledge the receipt.

Thanking you,  
Yours faithfully,  
For **The Swastik Safe Deposit & Investments Limited**

**Jitesh Kumar** Digitally signed by Jitesh  
Agarwal Kumar Agarwal  
Date: 2022.05.27  
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**Jitesh K. Agarwal**  
Company Secretary

**FCS - 6890**

Encl: a/a



**N L BHATIA & ASSOCIATES**  
**PRACTISING COMPANY SECRETARIES**

Tel. : 91-022-2510 0718  
Tel. : 91-022-2510 0698  
E-mail : navnitlb@hotmail.com  
brupadhyay@hotmail.com  
Website : www.nlba.in

To,  
The Board of Directors,  
The Swastik Safe Deposit and Investments Ltd.,  
CIN: L65190MH1940PLC003151  
4th Floor, Piramal Tower Annexe,  
Ganpatrao Kadam Marg, Lower Parel,  
Mumbai - 400013 IN

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2021-22**

We have been engaged by The Swastik Safe Deposit and Investments Ltd. (hereinafter referred to as the Company') bearing CIN: L65190MH1940PLC003151 whose Equity Shares are listed on the BSE Limited to conduct an 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 08<sup>th</sup> February 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 thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our 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.

Our 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.

Date: May 26, 2022.

Place: Mumbai.



For M/S. N. L. Bhatia & Associates  
Practicing Company Secretaries  
PR NO.:700/2020

Bhaskar Bharat Upadhyay  
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Bhaskar Bharat  
Upadhyay  
Date: 2022.05.26  
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**Bhaskar Upadhyay**

**Partner**

**FCS: 8663**

**COP NO.: 9625**

**UDIN: F008663D000392959**



**SECRETARIAL COMPLIANCE REPORT OF THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD FOR YEAR ENDED MARCH 31, 2022**

We, M/s. N.L. Bhatia & Associates Practicing Company Secretaries have examined:

- a) all the documents and records made available to us and explanation provided by **THE SWASTIK SAFE DEPOSIT AND INVESTMENTS LTD ("the Company")**.
- b) the filings/ submissions made by the Company to the Stock Exchanges.
- c) website of the Company.
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

for the year ended March 31, 2022 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, includes:-

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (b) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.



- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.
- (d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018, to the extent applicable on the Company.
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021- **(Not Applicable during the Financial Year).**
- (f) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 - **(Not Applicable during the Financial Year).**
- (g) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 - **(Not Applicable during the Financial Year).**
- (h) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2016 - **(Not Applicable during the Financial Year).**
- (i) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **(Not Applicable during the Financial Year).**
- (j) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 - **(Not Applicable during the Financial Year).**

and based on the above examination, I/We hereby report that, during the review period:

- a) The Company has complied with the provisions of the above Regulations and Circulars/ Guidelines issued thereunder, except in respect of matters specified below: -

S. No.	Compliance Requirement (Regulations/ Circulars / Guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
None			

- b) The Company has maintained proper records under the provisions of the above Regulations and Circulars/ Guidelines issued thereunder in so far as it appears from our examination of those records.

- c) The following are the details of actions taken against the Company/ 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:-

S. 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.
1.	The Company	Non-Compliance of Regulation 17(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 with respect to the requirements pertaining to composition of Board of Directors and failure to appoint Independent Director(s) as mandated under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Penalty – Rs. 5,66,400/- for the period ended on September 30, 2021	Complied

**Note:-** The Non - Compliance has been fulfilled by the Company by appointing Mr. Snehal Parikh as an Additional Independent Director w.e.f. December 30, 2021.

d) The Company has taken the following actions to comply with the observations made in previous Reports: -

S. No.	Observations of the Practicing Company Secretary in the Previous Reports	Observations made in the Secretarial Compliance Report for the year ended...	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NA				

Date: May 26, 2022.

Place: Mumbai.

For M/S. N. L. Bhatia & Associates

Practicing Company Secretaries

UIN: P1996MH055800

PR NO.:700/2020



Bhaskar

Bharat

Upadhyay

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Bhaskar Bharat  
Upadhyay  
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**Bhaskar Upadhyay**

**Partner**

FCS: 8663

COP NO.: 9625

UDIN: F008663D000392959