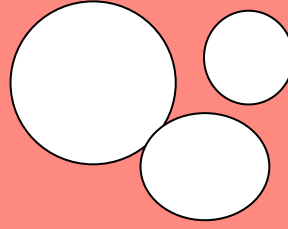


# SUN

TECHNO OVERSEAS LIMITED

CIN NO: L65910GJ1995PLC02670



July 24,2020

To,

Department of Corporate Services  
BSE Limited,  
Phiroze Jeejeebhoy Towers  
Dalal Street,  
Mumbai - 400 001

Dear Sir/Madam,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2019-20.**

In compliance with **SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019**, please finds enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2020 issued by secretarial auditor Mr. Haresh Kapuriya Practicing Company Secretaries. You are requested to take the same on your record.

Thanking you,

Yours faithfully,

FOR, SUN TECHNO OVERSEAS LIMITED

Sd/-

GAURANGKUMAR VINODRAY VAISHNAV  
DIRECTOR  
DIN NO.: 08175507  
Contact: 9376260729



# KH & ASSOCIATES

Practicing Company Secretaries

---

## ANNUAL SECRETARIAL COMPLIANCE REPORT

**Secretarial compliance report of SUN TECHNO OVERSEAS LIMITED for the year ended 31st March 2020**

We have examined:

- (a) all the documents and records made available to me and explanation provided by M/s. **SUN TECHNO OVERSEAS 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 on **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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued there under, 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; **(Not Applicable to during the review period)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the Review Period)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable during the Review Period)**





# KH & ASSOCIATES

Practicing Company Secretaries

- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;(Not Applicable during the review period)
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 1996 up to October 2, 2018 and Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 w.e.f. October 3, 2018;

and circulars/ guidelines/Amendments issued there under,

and based on the above examination, we hereby report that, during the Review Period:

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under to the extent applicable and in the manner prescribed, 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 |
|---------|--|---|--|
| 1       | Regulation 6(1) of SEBI (LODR) Regulation, 2015                                      | Non-Compliance with requirement to appoint a qualified Company Secretary for quarter ended September 2019 | The Company has not complied with the regulation.        |
| 2       | Regulation 14 of SEBI (LODR) Regulation, 2015  | Non-Payment of Annual Listing Fees (ALF) dues to BSE Limited  | The Company has paid listing fee                         |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under 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 there under:



# KH & ASSOCIATES

Practicing Company Secretaries

| 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. |
|---------|-----------------|---|---|---|
| 2       | BSE Limited     | Regulation 6(1) of SEBI (LODR) Regulation, 2015   | Levied monetary fines   | Company has not complied with regulation.                           |
| 3       | BSE Limited     | Regulation 14 of SEBI (LODR) Regulation, 2015- Non-Payment of Annual Listing Fees (ALF) dues to BSE Limited | Warning letter  | Company has paid listing fee  |

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

| Sr. No.        | Observations of the Practising Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31 <sup>st</sup> March, 2020 | Actions taken by the listed entity, if any | Comments of the Practising Company Secretary on the actions taken by the listed entity |
|----------------|--|--|--|--|
| Not Applicable |  |  |  |  |

Place: Vadodara  
Date: 26/06/2020  
UDIN: A026109B000387679

For, KH & Associates  
Practicing Company Secretaries



Haresh Kapuriya  
Partner  
M.NO: A26019 CP: 16749