

May 29, 2019

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

The National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (E),
Mumbai - 400 051

Scrip code: 512529

Scrip code: SEQUENT

Dear Sir/ Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2018-19

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 08, 2019, kindly find enclosed Annual Secretarial Compliance Report of the Company for the financial year 2018-19.

You are requested to take the same on record.

Thanking you,

Yours faithfully,
For Sequent Scientific Limited


Krupesh Mehta
Company Secretary

Encl: A/a

SeQuent Scientific Limited

Registered Office: 301/A, 'Dosti Pinnacle', Plot No.E7,Road No. 22, Wagle Industrial Area, Thane (W), Mumbai – 400604, India
Tel: +91 22 41114777 | FAX: +91-22-41114754 | CIN: L99999MH1985PLC036685
<http://www.sequent.in>

NILESH SHAH & ASSOCIATES

Company Secretaries

Ref.: _____

ANNUAL SECRETARIAL COMPLIANCE REPORT

FOR THE FINANCIAL YEAR ENDED 31ST MARCH, 2019

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015]

To
The Board of Directors,
Sequent Scientific Limited
301, 3rd Floor, Dosti Pinnacle,
Plot No. E7 Road No. 22,
Wagle Industrial Estate,
Thane west - 400 604

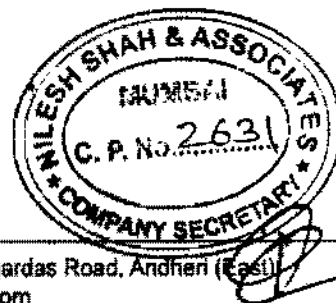
Dear Sir / Madam,

We, Nilesh Shah & Associates, Company Secretaries in Practice have examined:

- (a) all the documents and records made available to us and explanation provided by **Sequent Scientific Limited** (hereinafter called "**the Company**");
- (b) the filings/ submissions made by the listed entity to the stock exchanges;
- (c) website of the listed entity; and
- (d) other document/ filing, as may be relevant, which has been relied upon to make this certification;

for the financial year ended **31st March, 2019** 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



211-B (Back Side) 2nd Floor, Building No. 1, Sona Udyog, Parsi Panchayat Road, Extn. of Old Nagardas Road, Andheri (East)
Mumbai - 400 069. Tel. : 2820 7824 / 2820 3582 E-mail : nilsh@ngshah.com

304-A, Poonam Sagar, Poonam Nagar, Off. Mahakali Caves Road, Andheri (East), Mumbai - 400 093.
Tel.: 2836 3419 Email : ngshah.cs@gmail.com

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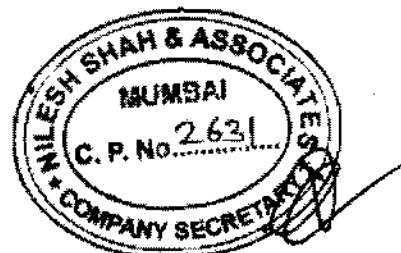
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made thereunder and the Regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India ("SEBI");

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) The Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 (to the extent applicable) / Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 (to the extent applicable);
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (e) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993, regarding the Companies Act and dealing with client;
- (f) The Securities and Exchange Board of India (Depository and Participant) Regulations, 1996 / Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (g) The Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

and circulars/ guidelines issued thereunder and based on the above examination, we hereby report that, during the financial year ended **31st March, 2019**:

- (a) The Company has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except in respect of matters specified below;



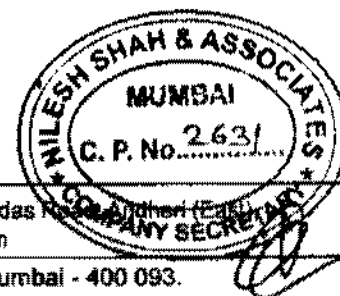
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Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	The Company shall notify the particulars of trading by Promoters to the stock exchange on which the securities are listed within two trading days (2 trading days) of receipt of the disclosure or from becoming aware of such information in trading in securities [Regulation 7 (2) (b) of Securities and Exchange Board of India (Prohibition of Insider Trading), Regulation, 2015.]	There was delay in one instance for making intimation of acquisition of shares by the Promoter. The disclosure was made by the Company after receipt of intimation under regulation 7(2)(a) of Securities and Exchange Board of India (Prohibition of Insider Trading), Regulation, 2015 from the Promoter instead of becoming aware of such information as required under regulation 7(2)(b.	The Company has delayed in filing of intimation as required under regulation 7(2)(b) of Securities and Exchange Board of India (Prohibition of Insider Trading), Regulation, 2015 in respect of acquisition of Shares by the Promoter.

- (b) The Company has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records;
- (c) No actions were taken against the Company/ its promoters/ directors/ material subsidiaries, if any 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;



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- (d) The Company was not required to take corrective action as there were no adverse observations made in previous reports:

Date: 14/05/2019

Place:- Mumbai

Signature:-

Name:- Nilesh Shah (Partner)

For:- **Nilesh Shah & Associates**

FCS : 4554

C.P. : 2631

