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SUNRISE INDUSTRIAL TRADERS LIMITED

Date: 19th June, 2021

To, Bombay Stock Exchange
P. J. Towers, Dalal Street,
Mumbai - 400 001
Dear sir,

Ref.: BSE Code No. 501110

SUB: SUBMISSION OF ANNUAL SECRETARIAL COMPLIANCE REPORT FOR YEAR ENDED 31st MARCH, 2021

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015, Company has appointed Mr. Kishor Ved, Practicing Company Secretaries, as Secretarial Auditor of the Company for the financial year ended on 31st March, 2021. They have carried out the secretarial audit and submitted Annual Secretarial Compliance Report dated 19th June, 2021.

We are enclosing the copy of the same for your record.

Kindly take same on your record

Thanking You

Yours faithfully

FOR SUNRISE INDUSTRIAL TRADERS LIMITED


SURESH RAHEJA
WHOLE TIME DIRECTOR
(DIN:00077245)



KS Kishor V. Ved
 B.Com., F.C.S.
 Practicing Company Secretary

D/215, Neelkanth Business Park,
 Near Vidyavihar Bus Depot,
 Vidyavihar (West), Mumbai - 400 086.
 Tel. (O) : +91 22 2510 0327
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 kishore.ved@gmail.com

**SECRETARIAL COMPLIANCE REPORT OF SUNRISE INDUSTRIAL TRADERS LIMITED FOR THE YEAR
 ENDED 31ST MARCH, 2021**

To,
SUNRISE INDUSTRIAL TRADERS LIMITED
 503, Commerce House,
 140, N. M. Road, Mumbai – 400 001

I, Kishor V. Ved, Practicing Company Secretary, have examined:

- (a) all the documents and records made available to me and explanation provided by **Sunrise Industrial Traders Limited** ("the listed entity") (**CIN - L67120MH1972PLC015871**),
- (b) the filings/ submissions made by the listed entity to the Bombay Stock Exchange,
- (c) website of the listed entity, is linked with www.bseindia.com to view all the submission, disclosures etc. made by 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 31st March, 2021 ("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 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, include: -

- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended:
- (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 the Company during the review period as the Company has not bought back any shares from the shareholders.

Kishor V. Ved, Practicing Company Secretary

- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- NOT APPLICABLE to the Company during the review period as the Company has not made any preferential allotment of securities as specified in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- NOT APPLICABLE to the Company during the review period as the Company has not issued any debt securities. Only equity shares of the company are listed on the Bombay Stock Exchange.
- (g) 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 review period as the Company has not issued any preference shares.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018 and circulars / guidelines issued thereunder;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, 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, except in respect of matters specified below:

Sr No.	Compliance Requirement (Regulation/Circulars/guidelines including specific clause)	Deviation	Observation/Remarks of Practicing Company Secretary
	NONE		

- (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 examination of those records.

Kishor V. Ved, Practicing Company Secretary

(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:

Sr No.	Action taken by	Details of Violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observation / remarks of the practicing Company Secretary if any
				NONE

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

Sr No.	Observation of the practicing Company Secretary in previous Report	Observation made in the Secretarial Compliance Report for the year ended 31.03.2021	Action Taken by Listed Entity if any	Comments on practicing Company Secretary on the action taken by the Listed entity
				Not Applicable



Mumbai, 19th June, 2021

UDIN - F005411C000487057

**KISHOR
VALLABH
DAS VED**

Digitally signed by KISHOR VALLABHDAS VED
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Date: 2021.06.19 11:59:21 +05'30'

**Kishor V. Ved
Practicing Company Secretary
F.C.S. No. : 5411
C. P. No.: 4691**