**CS B KRISHNAVENI**
B.Com., A.C.A., A.C.S.
COMPANY SECRETARY

Flat No 302, Heavenly Meadows,
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SSPDL LIMITED
3RD FLOOR, SERENE TOWERS
8-2-623/A, ROAD NO.10
BANJARA HILLS
HYDERABAD – 500 034

**Secretarial compliance report of SSPDL Limited**
**for the year ended March 31, 2020**

I have examined:

(a) all the documents and records made available to me and explanation provided by ***SSPDL 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 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 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;

(b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; ***(not applicable during review period)***

(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 during review period)***

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(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ***(not applicable during review period)***

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ***(not applicable during review period)***

(g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; ***(not applicable during review period)***

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

(j) Securities and Exchange Board of India (Depositories & Participants) Regulations, 2015;

Based on the above examination and explanations provided to me, 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 (Regulations/ circulars / guidelines including specific clause) | Deviations | Observations/ Remarks of the Practicing Company Secretary |
|---|---|---|---|
| 1. | In compliance with the requirement under the Regulation 13(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, Statement of Investor Complaints for the Quarter ended 30.09.2019 has to be filed within 21 days from the end of the Quarter, i.e on or before 21.10.2019. | Statement of Investor Complaints for the Quarter ended 30.09.2019 was filed on 22.10.2019 as against due date of 21.10.2019.<br><br>There was a delay of 1 day in filing the Statement of Investor Complaints pursuant to Regulation 13(3) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. | As per the oral explanations given, delay of 1 day in filing the Statement of Investor Complaints for the quarter ended 30.09.2019 was due to inadvertence on the part of Company. |

(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.

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(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. | Observations/ remarks of the Practicing Company Secretary, if any. |
|---|---|---|---|---|
| Not Applicable | | | | |

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

| Sr. No. | 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 | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---|---|---|---|---|
| Not Applicable | | | | |

**Place: Hyderabad**
**Date: July 28, 2020**

**B KRISHNAVENI**
**ACS No.: 9686**
**C P No.: 4286**

**UDIN: A009686B000514674**