

(AN ISO 9001:2015 CERTIFIED COMPANY)
CIN : L65993DL1994PLC060154

Regd. Office: 209, Bhanot Plaza - II
3, D .B. Gupta Road, Paharganj
New Delhi - 110055

Date: 25-05-2022

To,

Department of Corporate Services
Bombay Stock Exchange Limited
P. J. Towers, Dalal Street,
Mumbai- 400001

Subject: Submission of Certificate under Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 for the Financial Year ended on 31st March, 2022 (Scrip Code: 539574)

Dear Sir,

With reference to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we are enclosing herewith a copy of the Annual Secretarial Compliance Report for the period ended on **31st March, 2022**.

You are requested to take the above in your records and acknowledge the same.

Thanking you

Yours Faithfully

**For and on behalf of
SUNSHINE CAPITAL LIMITED**



**Surendra Kumar Jain
Managing Director
DIN: 00530035**

Encl-a/a

Parul Agrawal & Associates.

Company Secretaries

Add : - B/2, 3rd Floor, West Patel Nagar, Delhi -110008

M. No. +91-9554649629

Email : csparulagwl@gmail.com



ANNUAL SECRETARIAL COMPLIANCE REPORT
(Pursuant to Regulation 24A of Securities and Exchange Board of India
(Listing Obligations and Disclosure Requirements) Regulations, 2015

SUNSHINE CAPITAL, LIMITED ("The Company")

For The Year Ended 31st March, 2022

I, CS Parul Agrawal, Proprietor of Parul Agrawal & Associates, Company Secretaries, have examined;

(a) all the documents and records made available to me and explanation provided by the Company and its officers.

(b) the filings/ submissions made by the Company to BSE Limited from time to time.

(c) website of the Company; and

(d) such other documents/ filings, made by the Company, which has been relied upon to make this certification

For the year ended 31st March, 2022 ("Review Period") in respect of Compliance with the provisions of:

(a) Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and

(b) 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)**

(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;

(i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018

and circulars/ guidelines issued thereunder; 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 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
NIL			

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our 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 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.
NIL				



For Parul Agrawal & Associates
(Company Secretaries)

Date: 24/05/2022

CS Parul Agrawal
M. No. A35968
COP: 22311
UDIN: A035968D000373514

Annexure-A

To,

SUNSHINE CAPITAL LIMITED
209 Bhanot Plaza II 3 D B Gupta Road,
New Delhi-110055

My report of even date to be read along with this letter:

1. Maintenance of records is the responsibility of the management of the Company. My responsibility is to express an opinion on these records based on my audit.
2. I have followed the audit practices and processes as were appropriate to obtain reasonable assurance about the correctness of the contents of the Secretarial records. The verification was done on test basis to ensure that correct facts are reflected in secretarial records. I believe that the processes and practices, I have followed provide a reasonable basis for my opinion.
3. I have not verified the correctness and appropriateness of financial records and Books of Accounts of the Company.
4. Wherever required I have obtained the Management representation about the compliance of SEBI laws, rules and regulations thereof.
5. The compliance of the provisions of SEBI laws, rules and regulations is the responsibility of the management. My examination was limited to the verification of procedures on test basis.
6. This report is neither an assurance as to future viability of the Company nor of the efficacy and effectiveness with which the management has conducted the affairs of the Company.

Date:24/05/2022



For Parul Agrawal & Associates
(Company Secretaries)

CS Parul Agrawal
M. No. A35968
COP: 22311
UDIN: A035968D000373514