



SECRETARIAL COMPLIANCE REPORT OF SPORTKING INDIA LIMITED  
FOR THE YEAR ENDED 31<sup>ST</sup> MARCH, 2020

I, Rattan Lal (Membership No. F-9960), Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanation provided by **Sportking India 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,

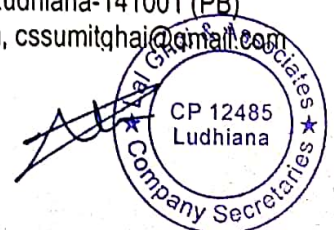
for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of:

- (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)**
- (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)**

3rd Floor, SCF-14, I Block, Sarabha Nagar market, Opp. Durga Mata Mandir, Ludhiana-141001 (PB)  
Tele: 0161-4610886, 8284000886, 9463640466 Email: rattanchanjotra@gmail.com, cssumitghai@gmail.com



Redeemable Preference Shares)Regulations,2013;*(Not applicable during review period)*

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

(i) SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003

and circulars/ guidelines issued thereunder;

and based on the above examination, 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 matter specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	The listed entity shall ensure that hundred percent of shareholding of promoter(s) and promoter group is in dematerialized form and the same is maintained on a continuous basis in the manner as specified by the Board.  <i>(Regulation 31(2) of SEBI (Listing Obligations and</i>	0.94 % of Promoter and Promoter group shareholding is not in dematerialized mode during financial year under review.	Out of total 24,63,450 Equity Shares of Promoter and Promoter Group Shareholding, 24,40,350 Equity Shares held by the promoter and promoter group are in dematerialized form and balance 23,100 Equity Shares held by them in physical form during review period. However as per the confirmation received from Management, as on date 1,500 Equity shares had further been converted into dematerialized form in current financial year and for balance 21,600 Equity shares, an application/ request

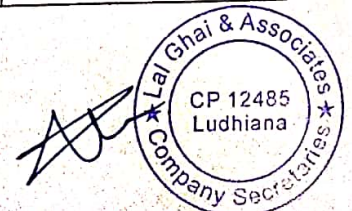


*Annual Secretarial Compliance Report for year ended 31 March, 2020*  
SPORTKING INDIA LIMITED

<b>Disclosure Requirements) Regulations, 2015)</b>		has already been initiated with the Depository Participant for dematerialization which is under process.
--	--	--

- (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 examination of those records.
- (c) There were no actions taken against the listed entity/ its promoters/ directors 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:
- (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
1.	Out of total 2463450 Equity Shares of Promoter and Promoter Group Shareholding, 2432150 Equity Shares held by the promoters and promoters group are in	31 <sup>st</sup> March, 2019	8,200 Equity Shares of Promoter and Promoter Group Shareholding converted into dematerialised form during the financial Year 2019-20 and 1500 Equity Shares in current financial year 2020-21.	The actions taken by listed company were satisfactory however 21,600 Equity Shares were still pending for dematerialization. As per the reply received, the Company was following up the matter with the shareholder for payment of balance



*Annual Secretarial Compliance Report for year ended 31 March, 2020*  
SPORTKING INDIA LIMITED

	<p>dematerialized and balance 31300 Equity Shares held in physical form during review period.</p>			<p>allotment money (delayed due to death of major Promoter of Investee Company) (pre-requisite for Demat) on 21,600 Equity Shares which was received on 18.02.2020 and after that the Company had applied to BSE on 20.02.2020 for Listing of these Equity Shares. As on 31.03.2020, the listing approval from BSE was pending and same was received as on 08.04.2020 and due to lockdown/Covid-19, there have been delay in submitting the application/ request to Depository Participant for Dematerlisation of these shares, which is under process.</p>
--	---	--	--	---

Place: Ludhiana  
Date: 28<sup>th</sup> July, 2020

For Lal Ghai & Associates & Associates  
Company Secretaries  
CP 12485  
Ludhiana  
  
**Rattan Lal, FCS**  
Partner  
M. No. 9960 / C.P. No. 12485  
UDIN: F009960B000518061