

EQUILATERAL ENTERPRISES LIMITED

(Formerly Known as: Surya Industrial Corporation Limited)

CIN:L36912UP1988PLC010285

Redg. Office: B-9, Industrial Estate, Partapur, Meerut- 250 103 (Uttar Pradesh)

Corp. Office: 120-121, Swati Chambers, Galemandi Main Road, Nr. Delhi Gate, Surat

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Date: 30.06.2021

To,
Department of Corporate Services,
Bombay Stock Exchange
Ground Floor, P.J. Towers,
Dalal Street Fort,
Mumbai-400001

Reference: Scrip Code - 531262

Subject: Annual Secretarial Compliance Report for the year ended 31st March 2021.

Dear Sir(s),

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, we are submitting here with the Annual Secretarial Compliance Report for the year ended 31st March, 2021.

Please take the same on your record and acknowledge the receipt of the same

Thanking You,
Yours Faithfully

For Equilateral Enterprises Limited
(Formerly Known as Surya Industrial Corporation Limited)

Sd/-
Pratik Kumar Mehta
Managing Director
DIN: 06902637



SECRETARIAL COMPLIANCE REPORT OF EQUILATERAL ENTERPRISES LIMITED
(Formerly Known as Surya Industrial Corporation Limited)
For the year ended on 31st March, 2021
(Under Regulation 24A of the SEBI (Listing Obligations and Disclosure
Requirements) Regulations, 2015)

To,
EQUILATERAL ENTERPRISES LIMITED
(Formerly Known as Surya Industrial Corporation Limited)
B-9 INDUSTRIAL ESTATE PARTAPUR,
MEERUT UP 250103

I Abhilasha Chaudhary have examined:

- all the documents and records made available to us and explanation provided by M/s. EQUILATERAL ENTERPRISES LIMITED ("the listed entity"),
- the filings/ submissions made by the listed entity (status as on date is suspended on BSE Ltd.) to the stock exchanges,
- website of the listed entity, (Website of the Company is not Fictional and not updates)
- other documents/ filings, which were relevant, and relied upon to make this certification and issue this report for the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

For the year ended 31st March, 2021 ("Review Period") in respect of compliance with the provisions of:

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

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (not applicable for the year under review);
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (not applicable for the year under review);
- Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; (not applicable for the year under review);
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- Securities Contracts (Regulation) (Stock Exchanges and Clearing Corporations) Regulations, 2018;

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 (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 6(1) of SEBI LODR Regulations 2015 appointment of Company Secretary cum Compliance Officer	Non appointment of Company Secretary	As per regulation 6(1) of SEBI LODR Regulations 2015 appointment of Company Secretary cum Compliance Officer is compulsory during the period of under review the company has not appointed Company Secretary cum Compliance officer. As Status of the Company is Suspended on BSE Ltd. w.e.f. 27 th August 2015 with the reason of Surveillance measure, the exchange has not imposed any penalties on the company during the audit period under Regulation 6(1).
2	Non-payment of Annual Listing Fees for F.Y. 2020-21	Non-payment of Annual Listing fees to BSE Ltd.	The Company has not paid annual listing fees for F.Y. 2020-21 under review of Audit Period.

Status of the Company as on date is suspended on BSE Ltd. The securities of the company are suspended with effect from 27th August, 2015 with reason of Surveillance Measure.

(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 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 during the audit period are as under:

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.
	Nil	Nil	Nil	Nil



For Abhilasha Chaudhary
Practicing Company Secretary

Abhilasha Chaudhary
Abhilasha Chaudhary
ACS No. 62496
CP No.: 23604

UDIN - A062496C000538611

Place: Mumbai
Date: 29/06/2021



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