

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

Ph: 91-261-2535577, E-mail: sicl1388@gmail.com Web: www.sicl.co.in

Date: 30th May, 2022

To,
The Department of Corporate Services,
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400001

Script Code: 539469; Script ID: PANORAMA.

Subject: Submission of Annual Secretarial Compliance Report under Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir(s),

In terms of Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019; we are enclosing herewith Annual Secretarial Compliance Report of the Company issued by M/s Abhilasha Chaudhary & Associates, Practicing Company Secretary, firm- Mumbai for the year ended March 31st, 2022.

You are requested to take this on your record and acknowledge the receipt.

Thanking You,
Yours Faithfully

For, Equilateral Enterprises Limited



Pratik kumar Sharadkumar Mehta
Managing Director
DIN: 06902637

Encl: Annual Secretarial Compliance Report



To
The Board of Directors
Equilateral Enterprises Limited
B-9, Industrial Estate,
Partapur, Meerut- 250 103

Dear Sir/Madam,

Subject: Annual Secretarial Compliance Report for the Financial Year 2021-22.

I have been engaged by **Equilateral Enterprises Limited** (hereinafter referred to as "the Company") bearing **CIN: L36912UP1988PLC010285** whose equity shares listed on **Bombay Stock exchange** to conduct audit in terms of Regulations 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with **SEBI's Circular No. CIR/CFD/CMD1/27/2019** dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is responsibility of the management of the Company to maintains records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and Circulars/ guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with guidance note on Annual Secretarial Compliance report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Abhilasha Chaudhary & Associates
Practising Company Secretary



Abhilasha Chaudhary, Proprietor
Mem. No.: ACS 62496
COP No.: 23604

Date: 30.05.2022





SECRETARIAL COMPLIANCE REPORT OF EQUILATERAL ENTERPRISES LIMITED
For the year ended for the year ended on 31st March, 2022
{Under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements)
Regulations, 2015}

I, Abhilasha Chaudhary, Practicing Company Secretary, have examined:

- all the documents and records made available to us and explanation provided by Equilateral Enterprises Limited ("the listed entity"),
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended **March 31, 2022** 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; ;(**not applicable on the Company for the year under Review**)
- 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 on the Company for the year under Review**)
- Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; ;(**not applicable on the Company for the year under Review**)
- Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; ;(**not applicable on the Company 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 on the Company for the year under Review**)
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

And based on the above examination, I hereby report that, during the Review Period:

- The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder except the following:





Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
			The company have Failed to pay the Annual Listing fees of the Bombay Stock Exchange where the Shares of the Company are listed hence the Stock Exchange have Suspended the Company from the year 2015.
1.	Securities and Exchange Board of India (Prohibition of insider Trading) Regulations, 2015		Closure of trading Window is not uploaded by the Company for the quarter of September, 2021, December, 2021 and March, 2021.
2.	Regulation 13(3) of SEBI (LODR) regulation, 2015 relating to Investor Grievance Complaint report	Delay in filing	The Company had delayed file Investor Grievance Report for the quarter ended March, 2022.
2.	Regulation 27(2) of SEBI (LODR) regulation, 2015 relating to Corporate Governance Report to be submitted by the Company Quarterly	Non filing for December, 2021 and March, 2022	The Company have failed to file Corporate Governance Report for December, 2021 and March, 2022.
3.	Regulation 31(3) of SEBI LODR relating to Share holding pattern.	Delay in filing	The Company had delayed file Shareholding Pattern of the quarter ended March, 2022.
4.	Update under Regulation 33 of SEBI(LODR) pertaining to Disclosure of Financial Results	Delay in filing	The Company filed Financial Results for the year ended March, 2021 on 30 th June, 2021.
5.	Update under Regulation 33 of SEBI(LODR) pertaining to Disclosure of Financial Results	Non filing for December, 2021 and March, 2022	The Company failed to file Unaudited Financial Results for the Quarter ended December, 2021 and Audited Financial Results for March, 2022.
6.	Regulation of 34 SEBI(LODR) Regulation, 2015 relating to filing of Annual Report	Non-Compliance	The Company, have not filed Annual Report of 31 st March, 2021.
7.	Regulation 47 of SEBI (LODR) Regulation, 2015 relating to publication of Financial Results in Newspaper.	Non- filing	The Company have not placed advertisement of the Financial Results in the Newspapers.
8.	Regulation 74(5) of SEBI	Non- filing	The Company have not filed for the quarter.





	(PIT) Regulation, 2018 relating to certificate about Dematerialization and Dematerialization during the year.		June, 2021, December, 2021 and March, 2022.
9.	Regulation 76(1) of SEBI(Depositories and participants) Regulation,2018 relating to Reconciliation of share Capital	Non- filing	The Company have not filed Reconciliation of Share Capital for the quarter ended June 2021, December, 2021 and March, 2022.

- (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.
- (c) There were no 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 in so far as it appears from my examination of those records cause the Company is under suspension:

Sr. No.	Action taken by	Details of Non-Compliance	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
During the audit period company securities are suspended on BSE Ltd.				

- (d) The Listed Entity has taken following Actions to comply with the Observations made in Previous Reports:

(e)

S. No.	Observations of the Practicing Company Secretary in previous reports	Observation made in the secretarial compliance report for the year end March 2021	Actions taken by Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the Listed Entity
	Regulation 6(1) of SEBI LODR appointment of Company Secretary cum Compliance	Non Appointment of Company Secretary	As per regulation 6(1) of SEBI LODR Regulations appointment of Company Secretary cum Compliance Officer is compulsory during the period of under	The Company has not yet complied with appointment of Company Secretary





ABHILASHA CHAUDHARY & ASSOCIATES
Practising Company Secretary

	Officer.		review the company has not appointed Company Secretary cum Compliance officer. As Status of the Company is Suspended on BSF 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).	
	Non- Payment of the Annual Listing Fees For F.Y 2020-21	Non- Payment of the Annual Listing Fees to BSE Ltd	The Company has not paid annual listing fees for the F.Y 2020-21.	The Company is asked to make payment of the Fees at the earliest.

For Abhilasha Chaudhary & Associates
Practising Company Secretary

Abhilasha
COP-23604
ACS-62496
Abhilasha Chaudhary Proprietor
Mem. No.: ACS 62496
COP No.: 23604
UDIN - A062496D000427388

Date: 30.05.2022



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