CIN: L51909GJ1997PLC031561

7 Shree Shakti Estate, Behind Milan Complex, Sarkhej-Sanand Cross Road, Sarkhej, Ahmedabad-382 210 Tel No.: 079-2909 6047 E-Mail: sctl31561@gmail.com, Website: www.sctl.in



Date: 16.05.2022

To, Listing Department, BSE Limited, P J Tower, Dalal Street, Mumbai-400001

Dear Sir/Madam,

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

In compliance with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please finds enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31st March, 2022 issued by secretarial auditor Ms. Geeta Serwani Practicing Company Secretaries. You are requested to take the same on your record.

Thanking you,

Your TOURNE TRADERS LIMITED

Director/Authorizes Signatory.

Fractions Company Secretary

(E): gserwani2@gmail.com (P): +91 888 55 36949

ANNUAL SECRETARIAL COMPLIANCE REPORT

Secretarial compliance report of M/S. SUNCARE TRADERS LIMITED(CIN: L51909GJ1997PLC031561) For the year ended 31st March, 2022.

I have examined:

- (a) all the documents and records made available to me and explanation provided by *M/S. SUNCARE TRADERS LIMITED(CIN: L51909GJ1997PLC031561*) " the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity, http://http://https://www.sctl.club/
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

For the year ended on March 31, 2022 ("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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/guidelines issued there under, 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 the period under review**.
- (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** the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable during the period under review.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable during the period under review.**



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- (g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; Not Applicable during the period under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 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 matters specified below:

Sr.No	Compliance Requirement (Regulations/	Deviations	Observations/ Remarks of
	circulars / guidelines including specific		the Practicing Company
	clause)		Secretary
1	SEBI (LODR) Regulations, 2015 – Regulation No. 13, 22 And 23	Policies for Grievance Redressal Mechanism, Vigil mechanism and Related party transaction are not framed.	The Company advised to make necessary policies immediately as per the regulation 13, 22 and 23.
2	SEBI (LODR) Regulations, 2015 – Regulation No. 30 and 47.	The listed entity shall publish the information in the newspaper	Necessary newspaper advertisements were not published during the period under review as per regulation 30 and 47.
3	SEBI (LODR) Regulations, 2015 – Regulation No. 23, 30 and 46	The listed entity should maintain a functional website containing the required details as specified in the SEBI (LODR) Regulations, 2015 are not available on website of the company	Some information's as per SEBI (LODR) Regulation 2015 are not available/updated on website of the company.
4.	SEBI (LODR) Regulations, 2015 - corporate governance provisions	Acknowledgement for sending the notices of the Meeting of the Board, General and Committees meetings are not maintained by the company. Minutes and Attendance Registers of the Board meeting and General Meeting for the period under review were not available to check.	Notices, Attendance Registers and Minutes book of General meetings, Board meetings and various committee meetings were not available to check/review.

(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.	Action taken by	Details of violation	Details	of	action	Observations/ remarks of the		
No			taken	E.g.	fines,	Practicing Company Secretary, if		
			warning letter,		letter,	any.		
			debarme	ent, etc	C.			
NIL								

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

Sr.	Observations of the		the	Observations made in the secretarial		Actions		Comments	of	the
No	Practicing Company		pany	compliance report for the year ended	by	the	listed	Practicing	Com	pany
	Secretary in the		the	2020	entity, if an		any.	Secretary	on	the
	previous reports							actions tak	en by	the
								listed entity	•	
NOT APPLICABLE										

Note: Company has amended Memorandum of Association due to increase in Authorized share capital.

For, GEETA SERWANI & ASSOCIATES

Practicing Company Secretary



Cs Geeta Serwani Proprietor C. P. No.: 8842

Membership No. 8991

Place: Secunderabad Date: 16.05.2022

UDIN: F008991D000326704