

South West Pinnacle

ISO 9001 : 2015 Certified Company

South West Pinnacle Exploration Limited
(formerly known as South West Pinnacle Exploration Pvt. Ltd.)

CIN No.: L13203HR2006PLC049480

Regd. & Corp. Office:

"Sidhartha House"

4th Floor, Plot No - 6, Sector-44,

Gurugram-122003

Haryana, INDIA

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(E) : info@southwestpinnacle.com

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Date: 07.06.2021

To,

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai - 400 051

Symbol: SOUTHWEST

Sub: Submission of Annual Secretarial Compliance Report for the Year ended March 31, 2021 under regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

Respected Sir/ Madam,

Pursuant to regulation 24(A) of SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015 read with SEBI circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith "Annual Secretarial Compliance Report" of the company for the Year ended March 31, 2021 issued by M/s KKS & Associates, Practicing Company Secretary for your kind perusal.

This is for your information and records.

Thanking You

For South West Pinnacle Exploration Limited


Vaishali

Company Secretary & Compliance Officer



Encl: as above

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SECRETARIAL COMPLIANCE REPORT OF M/S SOUTHWEST PINNACLE EXPLORATION LIMITED (CIN: L13203HR2006PLC049480) FOR THE YEAR ENDED 31ST MARCH 2021

[Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended vide SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019]

We **KKS & Associates** have examined:

- (a) all the documents and records made available to us and explanation provided by M/s South West Pinnacle Exploration Limited.
- (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 31st March 2021 (“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 since there were no events requiring compliance during the 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 since there were no events requiring compliance during the Review Period)*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not Applicable since there were no events requiring compliance during the Review Period)*
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not Applicable since there were no events requiring compliance during the Review Period)*



- (g) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not Applicable since there were no events requiring compliance during the Review Period)*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Circulars/Guidelines issued thereunder;
- (i) Securities and Exchange Board of India (Depositories and Participant) Regulation, 2018;

and based on the above examination, 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 (taking into account the relaxations and extension of time granted by SEBI from time to time to the Listed Companies in view of the Covid 19 pandemic situation).
- (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 was no event of appointment/re-appointment/resignation of statutory Auditor of the listed entity and listed entity has modified the term of appointment of its existing auditor and has complied with SEBI Circular no. CIR/CFD/CMD1/114/2019 dated October 18, 2019.
- (d) 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.
- (e) The listed entity has taken the following actions to comply with the observations made in previous reports. **No Observation were made in the previous reports**


S.No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance report for the year ended ... (the year are to be mentioned)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				

Place: New Delhi
Date: 07th June, 2021

UDIN: F008493C000426493



For KKS & ASSOCIATES
Company Secretaries


Krishna Kumar Singh
Proprietor
M. No. 8493

‘Annexure A’

To,
The Members,
SOUTH WEST PINNACLE EXPLORATION LIMITED
Siddhartha House, 4th floor, Plot No.6,
Sector-44, Gurgaon HR 122003

Our report of even date is to be read along with this letter.

- a. Maintenance of Secretarial record is the responsibility of the management of the Company. Our responsibility is to express an opinion on these secretarial records based on our audit.
- b. We have followed the audit practices and process 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. We believe that the process and practices, we followed provide a reasonable basis for our opinion.
- c. In view of lockdown due to COVID-19, we have conducted our verification and examination of the records/documents provided by company through email and/or other digital mode.
- d. Where ever required, we have obtained the Management representation about the Compliance of laws, rules and regulations and happening of events etc.
- e. As regards the books, papers, forms, reports and returns filed by the Company under the above mentioned regulations, the adherence and compliance to the requirements of the said regulations is the responsibility of management. Our examination was limited to checking the execution and timeliness of the filing of various forms, reports, returns and documents that need to be filed by the Company under the said regulations. We have not verified the correctness and coverage of the contents of such forms, reports, returns and documents.

Place: New Delhi
Date: 07th June, 2021



For KKS & ASSOCIATES
Company Secretaries


Krishna Kumar Singh
Proprietor
M. No/ 8493