



**SWISS  
MILITARY**

May 17, 2022

BSE Limited  
Listing Department  
P J Towers, Dalal Street  
Mumbai – 400 001  
Scrip Code- 523558

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

Dear Sir/ Madam,

In compliance of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 08, 2019, we enclosing herewith the 'Annual Secretarial Compliance Report' for the financial year ended as on March 31, 2022.

Kindly take the above on record.

Thanking You

For **SWISS MILITARY CONSUMER GOODS LIMITED**

  
**VIKAS JAIN**  
**COMPANY SECRETARY**



**SWISS MILITARY CONSUMER GOODS LIMITED**

(Erstwhile known as Network Limited)

Regd. Office: W-39, Okhla Industrial Area, Phase-II, New Delhi – 110020

Tel.: +91 11 41067060, [www.swissmilitaryshop.com](http://www.swissmilitaryshop.com)

CIN: L51100DL1989PLC034797

# V K SINGH & CO

Company Secretaries

Email:-svikash630@gmail.com,

Cell. +91-9582467808



## SECRETARIAL COMPLIANCE REPORT OF SWISS MILITARY CONSUMER GOODS LIMITED FOR THE YEAR ENDED 31<sup>st</sup> MARCH 2022

I, Vikash Kumar Singh, Practicing Company Secretary have examined:

- a) all the documents and records made available to us and explanation provided by Swiss Military Consumer Goods Limited (CIN: L51100DL1989PLC034797) having its registered office at W-39, Okhla Industrial Area, Phase- II, New Delhi- 110020 ("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 2021-22 ("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; and circulars/ guidelines issued thereunder.
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (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 as the entity has not bought back/propose to buy back any of its securities during the year under review)**
- (e) The Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021. **(However, there were no actions / events pursuant to these regulations, hence not applicable.)**

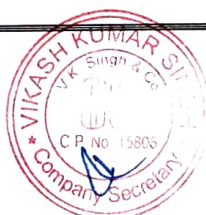


- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008. **(The entity has not issued any Debt securities during the financial year under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- convertible Securities) Regulations, 2021. **(The entity has not issued any non-convertible securities during the financial year under review)**
- (h) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009. **(However, there were no actions / events pursuant to these regulations, hence not applicable)**
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client; and circulars/ guidelines issued thereunder.

The Securities and Exchange Board of India (Depository and Participant) Regulations, 2018 and based on the above examination, 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.
- 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. The following are the details of actions taken against the listed entity 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.

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.
1	BSE Limited	Regulation 19(1)/ 19(2) - Non - Compliance with the constitution of nomination and remuneration committee	A penalty of Rs. 1,30,000/- and 18% GST of Rs. 23,400/-, Total an amount of Rs. 1,53,400/- was levied on the company for the quarter ended June 2021.	The company vide its letter dated 30 <sup>th</sup> August, 2021 clarified that company has duly complied with the provisions of Regulation 19(1)/ 19(2) of SEBI (Listing Obligation and Disclosure Requirements) Regulations 2015 and therefore penalty levied on the company is



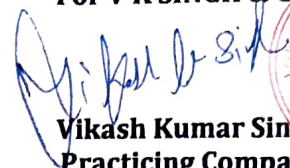
				not maintainable, hence same should be withdrawn. Accordingly, BSE Ltd. vide its email dated 31 <sup>st</sup> December, 2021 had withdrawn the said penalty.
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- d. There were no observations in the previous report i.e. for the financial year 2020-21. Therefore, no actions required by the company to comply with observations-.

**Place: Delhi**

**Date: 12.05.2022**

**For V K SINGH & Co.**

  
**Vikash Kumar Singh**

**Practicing Company Secretary**

**Mem No.: A- 42789**

**C. P. No.: 15806**

**UDIN: - A042789D000312861**

