



KAMANWALA HOUSING CONSTRUCTION LIMITED

REGD. & ADMINISTRATIVE OFFICE: 135/406, NEW UDYOG MANDIR - 2,
MOGUL LANE, MAHIM (WEST), MUMBAI - 400 016.
Tel.: 2444 0601, 2445 6029, 2447 4983 • Email : kamanwala@gmail.com
Website : www.kamanwalahousing.com CIN: L65990MH1984PLC032655

25th May, 2024

To,
BSE Limited,
1st Floor, Rotunda Building,
B.S. Marg, Fort, Mumbai - 400 001

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Ref: Scrip Code: 511131 Scrip Name: KAMANWALA

With Reference to the above-mentioned subject, we are attaching herewith Secretarial Compliance Report for the year ended 31st March, 2024 given by M/s. Devesh Mehta & Associates, Practicing Company Secretaries, Bhavnagar in compliance of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI circular no - CIR/CFD/CMD1/27/2019 dated February 8, 2019.

You are requested to kindly take the same on your records.

Thanking you,

Yours faithfully,

For Kamanwala Housing Construction limited

Divya Agarwal
Company Secretary & Compliance Officer
Encl: As Stated



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

Secretarial Compliance Report of
KAMANWALA HOUSING CONSTRUCTION LIMITED

for the year ended 31st March 2024

I, Devesh Mehta & Associates, Practicing Company Secretaries have examined:

- 1) all the documents and records made available to us and explanation provided by KAMANWALA HOUSING CONSTRUCTION LIMITED - CIN L65990MH1984PLC032655 ("the listed entity")
- 2) The filings/ submissions made by the listed entity to the stock exchanges: Verified on the BSEINDIA .COM Website,
- 3) Website of the listed entity is UPDATED,
- 4) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31.3.2024 ("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 for the financial year ended 31.03.2024 ("Review Period"), 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,
- 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;
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

Office At: 208, RATNADEEP COMPLEX, ABOVE ICICI BANK, NR. CENTRAL SALT, WAGHAWADI
ROAD, BHAVNAGAR-364001

M: +91-9428401989

O: +91-9825204369

EMAIL:csdeveshmehta@gmail.com



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

and based on the above examination, we 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 in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations /Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
-	-	-	-	-	Advisory/ Clarification/ Fine/ Show Cause Notice/ Warning etc.	-	-	-	-	-

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

Sr. No.	Observations/ Remarks Of the Practicing Company Secretary	Observations made in the secretarial compliance report for	Compliance Requirement (Regulations/ circulars/ guidelines including specific	Details of violation / deviations and actions taken /	Remedial actions, if any, taken by the listed entity	Comments of the PCS on the actions taken by the listed entity



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

	<i>in the previous reports) (PCS)</i>	<i>the year ended (the years are to be mentioned)</i>	<i>clause)</i>	<i>penalty imposed, if any, on the listed entity</i>		

In the report for the year ended 31st Mar, 2024, the PCS shall provide a list of:

- all the observations in the report for the year ended 31st March, 2024 along with the actions.: **None**
- taken by the listed entity on those observations. : **None**
- the observations in the reports pertaining to the year ended 31st March, 2024 and earlier, in case the entity has not taken sufficient steps to address the concerns raised/ observations in those reports.): None

I. I/we hereby report that, during the review period the compliance status of the listed entity with the following requirements:

Sr. No.	Particulars	Compliance Status (Yes/ No/NA)	Observation s/Remarks by PCS*
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries of India (ICSI).	YES	NA
2.	Adoption and timely updating of the Policies: <ul style="list-style-type: none">• All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.• All the policies are in conformity with SEBI Regulations and have been	Yes Yes	NA NA

Office At: 208, RATNADEEP COMPLEX, ABOVE ICICI BANK, NR. CENTRAL SALT, WAGHAWADI ROAD, BHAVNAGAR-364001

M: +91-9428401989

O: +91-9825204369

EMAIL:csdeveshmehta@gmail.com



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

	reviewed & updated on time, as per the regulations/ circulars/guidelines issued by SEBI.		
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">• The listed entity is maintaining a functional website.• Timely dissemination of the documents/ information under a separate section on the website.• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.	Yes Yes Yes	NA NA NA
4.	Disqualification of Director(s): None of the director(s) of the listed entity is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity	Yes	Checked the status with MCA website and it shows none of them are disqualified/ NA
5.	Details related to subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies. (b) Disclosure requirement of material as well as other subsidiaries.	NA NA	NA NA
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per policy of preservation of documents and archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	NA

Office At: 208, RATNADEEP COMPLEX, ABOVE ICICI BANK, NR. CENTRAL SALT, WAGHAWADI ROAD, BHAVNAGAR-364001

M: +91-9428401989

O: +91-9825204369

EMAIL:csdeveshmehta@gmail.com



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

7.	Performance Evaluation: The listed entity has conducted performance evaluation of the board, independent directors and the committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	NA	---
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of audit committee for all related part transactions; (b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	Yes NA	Checked and verified with the minutes Book The same has been complied with hence NA
9.	Disclosure of events or information: The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	No observation
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	



DEVESH MEHTA

& ASSOCIATES

COMPANY SECRETARY

11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>No action(s) has been taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder (or)</p> <p>The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.</p>	<p>Yes (No actions has been taken)</p> <p>NA</p>	<p>---</p> <p>No Notice received by the SEBI or Stock Exchange as been informed by the management and no Actions need to be taken as per the data base of the company</p>
12.	<p>Resignation of statutory auditors from the listed entity or its material subsidiaries:</p> <p>In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.</p>	<p>NO</p>	<p>No Resignation of Auditor during the year under review</p>
13.	<p>Additional Non-compliances, if any:</p> <p>No additional non-compliances observed for any SEBI regulation/circular/guidance note etc. except as reported above.</p>	<p>NA</p>	<p>None Observed as per the data base of the company</p>

Office At: 208, RATNADEEP COMPLEX, ABOVE ICICI BANK, NR. CENTRAL SALT, WAGHAWADI ROAD, BHAVNAGAR-364001

M: +91-9428401989

O: +91-9825204369

EMAIL:csdeveshmehta@gmail.com



DEVESH MEHTA & ASSOCIATES
COMPANY SECRETARY

Assumptions & limitation of scope and review:

- 1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.**
- 2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.**
- 3. We have not verified the correctness and appropriateness of financial records and books of account of the listed entity.**
- 4. This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.**

**DEVESH
UPENDRAB
HAI MEHTA**

Digitally signed by
DEVESH
UPENDRABHAI
MEHTA
Date: 2024.05.24
17:55:34 +05'30'

Date : 24th May, 2024
Place : Bhavnagar

**DEVESH UPENDRABHAI MEHTA
PROPRIETOR
FOR DEVESH MEHTA & ASSOCIATES
PRACTICING COMPANY SECRETARIES
ACS No.: 45544 C. P. No.: 16649
UDIN: A045544F000444646
Peer Review Cert no: 1766/2022**