



31<sup>st</sup> July, 2020

To,  
The Corporate Relationship Manager  
Department of Corporate Services  
BSE Ltd., P J Towers, Dalal Street,  
Mumbai - 400001

**Ref : Scrip Code - 540756**

**Subject : Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup>  
March, 2020**

Dear Sir,

Please find enclosed herewith the Annual Secretarial Compliance Report of practicing company secretary as per Regulation 24A of SEBI (LODR) Regulations, 2015 for the year ended on 31<sup>st</sup> March, 2020.

Kindly take the same on record and acknowledge the receipt.

Thanking you,

Yours faithfully,  
For Kaarya Facilities And Services Limited



Jitendra Adhyaru  
CFO

**Kaarya Facilities And Services Ltd.**

217, Gemstar Commercial Complex, Ramchandra Lane Extn., Kanchpada, Malad (West), Mumbai - 400 064.  
CIN No. : L93090MH2009PLC190063 • Telefax : +91-22-4003 0768 • E-mail : info@kaarya.co.in • url : www.kaarya.co.in

# SARK AND ASSOCIATES

## Company Secretaries

Gala no: 215, Gundecha Industrial estate, Akurli road, Kandivali East, Mumbai – 400101

---

### Secretarial Compliance Report of Kaarya Facilities And Services Limited for the year ended 31<sup>st</sup> March, 2020

We, SARK & Associates, Practicing Company Secretaries have examined:

- (a) all the documents and records made available to us and explanation provided by Kaarya Facilities And Services Limited (“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 31.03.2020 (“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 during the year under review*)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (*Not applicable during the year under review*)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (*Not applicable during the year under review*)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (*Not applicable during the year under review*)

- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable during the year under review)*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable during the year under review)*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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, except in respect of matters specified below:-

Sr. no:	Compliance Requirement (Regulations! circulars! guidelines including specific clause)	Deviations	Observation/remark by Practicing Company Secretaries
	NA	NA	NA

- (b) On the basis of information provided to us, the listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from our examination of those records .

- (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. no:	Action taken by	Details of violation	Details of action taken	Observation/remark by Practicing Company Secretaries
1	N.A.	N.A	N.A	N.A

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

Sr. no:	Observation /remark by Practicing Company Secretaries	Observations made in the secretarial compliance report for the year end (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
	NA	NA	NA	

**For SARK & Associates  
Practicing Company Secretaries**

**Sumit Khanna  
Partner**

**Membership No.: 22135**

**C P No.: 9304**

**Place: Mumbai Date: 31.07.2020**

**UDIN - A022135B000541379**