



# ISL CONSULTING LIMITED

CIN No. : L67120GJ1993PLC086576

Regd. Office : 501, 5th Floor, Abhijeet - II, Above Standard Chartered Bank, Nr. Mithakhali Six Road,  
Ahmedabad-380009. Ph. 079-40030351, 079-40030352 Fax : 079-30077352  
E-mail : innogroup@gmail.com , Website : www.islconsulting.in

July 31, 2020

To,  
The Corporate Relationship Department,  
**BSE Limited**  
P J Towers, Dalal Street,  
Mumbai-400001,  
Maharashtra, India.  
**Scrip Code: 511609**

Dear Sir / Madam,

**Subject: Annual Secretarial Compliance Report for the financial year ended on March 31, 2020**

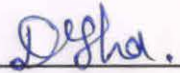
Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we are enclosing herewith the Annual Secretarial Compliance Report, issued by M/s. Keyur J. Shah & Associates, Practicing Company Secretary, Ahmedabad for the financial year ended on March 31, 2020.

You are requested to take the same on your record.

Thanking You,

Yours Faithfully,

For, ISL Consulting Limited



Disha Shah

Company Secretary & Compliance Officer



Encl: As Above



**SECRETARIAL COMPLIANCE REPORT OF ISL CONSULTING LIMITED**  
FOR THE FINANCIAL YEAR ENDED 31<sup>st</sup> MARCH 2020

To,  
**ISL Consulting Limited,**  
501, 5th Floor, Abhijeet-II,  
Above Standard Chartered Bank,  
Near Mithakhali Six Road: 380009,  
Ahmedabad, Gujarat, India

We, **Keyur J. Shah & Associates, Company Secretaries** have examined:

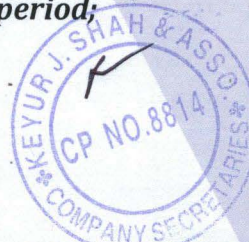
- a) all the documents and records made available to us and explanation provided by **ISL CONSULTING LIMITED** having CIN-L67120GJ1993PLC086576 ("the Listed Entity/ Company");
- b) the filings/ submissions made by the listed entity to the stock exchanges;
- c) website of the listed entity (<http://www.islconsulting.in>)
- d) any other document/ filing, as may be relevant, which has been relied upon to make this certification.

**For the year ended March 31, 2020 ("Review Period") in respect of compliance with the provisions of;**

- a) all the applicable regulations, circulars, guidelines issued thereunder by the Securities and Exchange Board of India (SEBI); and
- b) the Securities Contract (Regulation) Act, 1956 ("SCRA"), rules made thereunder by SEBI

**The specific Regulations, 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 as no securities were issued by the listed entity for the relevant 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 as no securities were bought back by the Listed entity during the reporting period;**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014: **Not Applicable as no securities were issued to the employees under Employee Stock Option Scheme or Employee Stock Purchase Scheme by the listed entity during the reporting period;**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008: **Not Applicable as no Debt securities were issued by the listed entity during the reporting period;**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013: **Not Applicable as no Non-Convertible and Redeemable Preference Shares were issued by the listed entity during the reporting period;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and circulars/ guidelines issued there under;

**Based on the above examination, we hereby report that, during the Review Period (i.e. 01<sup>st</sup> April, 2019 to 31<sup>st</sup> March, 2020):**

- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued there under, except in respect of matters specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	-	Refer Annexure I for our comments



2	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011	-	Refer Annexure II for our comments
3	Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015	-	Refer Annexure III for our comments

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from our examination of those records.

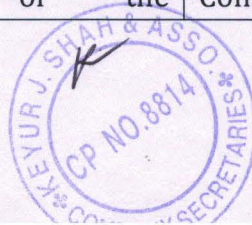
(c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued there under:

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	Bombay Stock Exchange	Late submission of Annual report for the year ended March, 2019	The BSE imposed a penalty via exchange letter dated 15.10.2019 under regulation 34 of LODR on account of non-submission of Annual report prescribed under this regulation.	The Company has made clarification dated 16.10.2019 and the said levied fine was withdrawn by BSE dated 07.01.2020.



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

Sr. No	Observations of the PCS in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	NA	<p>In the matter of dealing in Illiquid Stock Options at BSE Limited-</p> <p>The adjudicating proceedings are currently ongoing, wherein the listed entity has submitted their reply to the Securities and Exchange Board of India.</p> <p>The Company has received Show cause notice of SEBI bearing reference No. EAD-4/ADJ/ SRP / HKS/ OW/ P/ 31347/1/2018 dated 14.11.2018</p>	<p>In respect of said letter, the Company replied to the Adjudicating Officer, EAD, Securities and Exchange Board of India via their letter dated 21.11.2018 and dated 19.12.2018 and no further communication has been received by the Company from the SEBI in this regard.</p>	<p>In absence of further direction from the SEBI, no action is warranted from the Company's end.</p>
2	NA	<p>The discrepancy/ non-compliance was noted in the letter by SEBI dated 17.10.2018 for the formation of Audit Committee and Nomination and remuneration committee of the company, as per Corporate Governance Report submitted for the Quarter ended September, 2018, wherein 2 directors and no chairperson, the composition of the</p>	<p>Clarification was made to the BSE by the Company on 19.10.2018.</p> <p>Further communication was received from the BSE on 31.10.2018 to which a clarification was submitted by the Company on</p>	<p>The Company appointed Mr. Savjibhai Galiya as an independent Director on 29<sup>th</sup> November, 2018 on the Board and Committees for proper constitution of Board.</p>



	<p>Committees was disturbed due to sudden demise of the Independent Director of the Company, Late Mr. Hasmukh M. Thakkar, Due to the sudden unexpected demise the listed entity was not able to appoint an independent director immediately,</p> <p>The demise was taken on record through Board Meeting on 6th October 2019 and the same was intimated immediately to the Stock Exchange [BSE Limited]. Further, the listed entity appointed Additional Director (independent) on 29th November, 2018 i.e. within 3 months of the cessation of Late Mr. Hasmukh M. Thakkar', complying with the provisions of the Companies Act, 2013</p>	<p>12.11.2018.</p> <p>Thereafter, on 14.11.2018, the BSE waived off the penalty therein.</p>	
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**Place: Ahmedabad**  
**Date: 31<sup>st</sup> July, 2020**

**For Keyur J. Shah and Associates**

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**CS Keyur J. Shah**  
**Keyur J. Shah & Associates,**  
**Company Secretaries**  
**FCS No.: 9559**  
**C P No.: 8814**  
**UDIN: F009559B000537592**

**Annexure-1**

**Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015**

Information regarding documents, forms, returns, notices, intimations, etc. filed during the audit period, with the stock exchanges under The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

1. In compliance with requirements under Regulation 7(3), the listed entity has submitted compliance certificate to the stock exchange as detailed below:

Sr. No.	Description	Due date for intimation	Date of Intimation
1	Compliance Certificate for Period Ended March, 2019	30.04.2019	08.04.2019
2	Compliance Certificate for Period Ended September 30, 2019	31.10.2019	19.10.2019
3	Compliance Certificate for Half Year Ended March 31, 2020	30.04.2020 Extended up to 31.05.2020 Via SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/38 dated 19.03.2020	20.05.2020

2. The listed entity has formulated the policy for preservation of documents under Regulation 9 and published the same on its website.
3. The entity is registered on the SCORES platform and complied with provision of Regulation 13 for Grievance Redressal Mechanism.

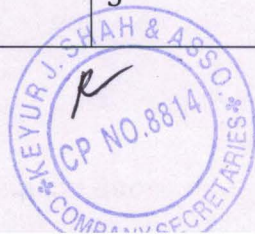
Sr. No.	Description	Due date of Intimation	Date of Intimation
1	Statement of Investor Complaints for The Quarter Ended March 2019	21.04.2019	08.04.2019
2	Statement of Investor Complaints for The Quarter Ended June 2019	21.07.2019	09.07.2019



3	Statement of Investor Complaints for The Quarter Ended September 2019	21.10.2019	07.10.2019
4	Statement of Investor Complaints for The Quarter Ended December 2019	21.01.2020	03.01.2020
5	Statement of Investor Complaints for The Quarter Ended March 2020	21.04.2020 Extended up to 15.05.2020  Via SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/38 dated 19.03.2020	05.05.2020

4. The compliance officer has declared that the listed entity has paid the Fees and other charges to be paid to the recognized stock exchange(s) pursuant to Regulation 14.
5. The listed entity has duly complied with the provisions for composition of Board of Directors and other provisions pursuant to Regulation 17 (1), (1A), (2) and (2A) of the Regulations.
6. Pursuant to Regulation 17(10), the evaluation of independent directors was done by the Board in the meeting held on 06/02/2020, as reflected from the minutes.
7. The directors of the listed entity have complied with the provision of maximum number of directorships as required under Regulation 17A.
8. The listed entity has duly constituted the Committees under Regulation 18, 19 and 20 of the Regulations and further has conducted Committee Meetings on following dates with adequate quorum:

Committee	No. of Committee Members as on 31/03/2019	Date of Meetings
Audit Committee	3	28.05.2019
		11.09.2019
		12.12.2019
		06.02.2020
Stakeholder	3	28.05.2019
		11.09.2019





Relationship Committee		12.12.2019
		06.02.2020
Nomination and Remuneration Committee	3	19.08.2019
		06.02.2020

9. The listed entity has formulated vigil mechanism for directors and employees pursuant to Regulation 22 of the Regulation.
10. The listed entity has also formulated policy on materiality of related party transaction and on dealing with related party transaction (also published on its official website). Further, the compliance officer has reported that there are no related party transactions other than filed and mentioned below;

Sr. No.	Description	Due date of Intimation	Date of Intimation
1	For half year ended September, 2019	30/10/2019	14/12/2019

11. The listed entity does not have any subsidiary and therefore Regulation 24 is not applicable.
12. Pursuant to Regulation 25 (3), the independent directors of the listed entity have conducted meeting on 06<sup>th</sup> February, 2020.
13. Pursuant to Regulation 27 (2), during the reporting period, the listed entity has submitted quarterly compliance report on corporate governance in the format as specified by the Board from time to time to the recognised stock exchange(s) within fifteen days from close of the quarter, detailed as under:

Sr. No.	Description	Due date of intimation	Date of Intimation
1	Quarter Ended March 31, 2019	15/04/2019	04/04/2019 04:42:31 PM
2	Quarter Ended June 30, 2019	15/07/2019	08/07/2019 03:45:14 PM
3	Quarter Ended September 30, 2019	15/10/2019	11/10/2019 02:44:21 PM
4	Quarter Ended December 31, 2019	15/01/2020	07/01/2020 12:22:59 PM
5	Quarter Ended March 31, 2020	15/04/2020 Extended up to 30/06/2020 Via SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/38 dated 19.03.2020	14/05/2020 03:26:42 PM



14. The listed entity has given prior intimation to stock exchange about the Board Meetings under Regulation 29 (1) on the following dates for respective Board Meetings within time.

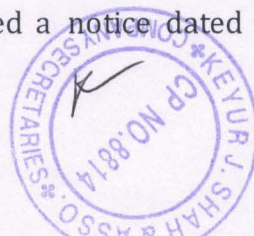
Sr. No	Date of BM	Pre announcement	Due date of Intimation	Intimation of Outcome of Meetings
1	03.04.2019		Not Applicable	
2	28.05.2019	20.05.2019	24.05.2019	28.05.2019 6.10 PM
3	19.08.2019	10.08.2019	16.08.2019	19.08.2019 15:34:52
4	10.09.2019	31.08.2019	07.09.2019	The meeting was postponed to 11.09.2019
5	11.09.2019	Not Applicable	Not applicable	11.09.2019
6	12.12.2019	02.12.2019	09.12.2019	12.12.2019
7	06.02.2020	29.01.2020	03.02.2020	06.02.2020 16:58:56

15. The compliance officer has reported the following list of material events under Regulation 30(1) and 30(5) and made disclosures to Stock Exchange accordingly:

- Disclosure of Financial Results
- Proceedings of AGM (FY 2018-19).
- Resignation of Company Secretary / Compliance Officer of Ms. Bhanupriya Katta whose Resignation effected from 06.02.2020 and intimation of the same was made on 28-01-2020 17:27:06.
- Change in authorization of KMP for determining materiality of events or information under 30(5) of LODR in which they updated the details of authorized person from Ms. Bhanupriya Katta to Mr. Ankit Shah. The intimation of the same was made on 07-02-2020 15:07:23.

16. The listed entity has intimated to BSE to comply with the following circulars and notifications or clarification sought in the review period;

- Intimation Regarding Applicability Of IND-AS Rules (accordance with SEBI Circular CIR/IMD/DF1/69/2016 dated August 10, 2016) made on 09.08.2019;
- Announcement Under SEBI Circular No. SEBI/HO/MIRSD/DOS3/CIR/P/2018/139 for notice of proposed transfer, the intimation of the same was made on 21.09.2019;
- Format of Initial Disclosure to be made by an entity identified as a Large Corporate SEBI circular SEBI/HO/DDHS/CIR/P/2018/144 dated November 26, 2018 declaring that it is not a large Corporate Entity was made on 12.10.2019;
- The Company has received a notice dated 13.03.2020 in reference to



significant movement in price and clarification for it was submitted by the Company on 16/03/2020;

17. The listed entity has formulated policy for determination of materiality pursuant to Regulation 30(4)(ii) also published the same on its official website.
18. The listed entity is required to submit shareholding pattern on a quarterly basis, within twenty-one days from the end of each quarter, for which following submissions are made under Regulation 31 (1) (b).

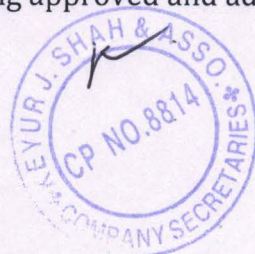
Sr. No.	Description	Due date of intimation	Date of Intimation
1	Shareholding for the Period Ended March 31, 2019	21/04/2019	09/04/2019
2	Shareholding for the Period Ended June 30, 2019	21/07/2019	19/07/2019
3	Shareholding for the Period Ended September 30, 2019	21/10/2019	11/10/2019
4	Shareholding for the Period Ended December 31, 2019	21/01/2020	13/01/2020
5	Shareholding for the Period Ended March 31, 2020	21/04/2020 Extended up to 15.05.2020 Via SEBI Circular No. SEBI/HO/CFD/CMD1/CIR/P/2020/38 dated 19.03.2020	08/05/2020

19. Entire shareholding of the promoter(s) and promoter group is in dematerialized form as per the data available on the stock exchange.
20. The compliance officer has declared that no requests for the re-classification of any person as promoter/ public was received during the reporting period under Regulation 31A.
21. Statement of deviation(s) or variation(s) under Regulation 32 was not applicable on the Company.
22. The compliance officer has declared compliance of Regulation 33, and made the listed entity has submitted financial results on following dates complying with Regulation 33(3) (a).



Sr. No.	Description	Due date of intimation	Date of Intimation
1	Audited Financial Results for Quarter and Year Ended March 31, 2019	29-05-2019	28-05-2019
2	Financial Results for June 30, 2019	14-08-2019 With extension, due date was 14-09-2019	11-09-2019 Revised on 21-09-2019  As this was first year for the applicability of IND- AS on the Company so the extended period of 1 Month was applicable for the concerned quarter in accordance with the SEBI Circular No. CIR/IMD/DF1/69/2016 dated August 10, 2016.
3	Financial Results for Period Ended September 30, 2019	14-11-2019 With extension, due date was 14-12-2019	12-12-2019  As this was first year for the applicability of IND- AS on the Company so the extended period of 1 Month was applicable for the concerned quarter in accordance with the SEBI Circular CIR/IMD/DF1/69/2016 dated August 10, 2016
4	Financial Results for December 31, 2019	14-02-2020	06-02-2020
5	Financial Results for Quarter and Year Ended March 31, 2020	31-07-2020	29-06-2020

23. Pursuant to Regulation 34 (1), the listed entity has published the Annual Report for FY 2018-19 on its website and also submitted to Stock Exchange on within 21 working days of it being approved and adopted in the Annual General Meeting.



24. During the reporting period, the listed entity has complied with Regulation 38 with respect to Minimum Public Shareholding.
25. The listed entity has submitted certificate under Regulation 40 (9) read with 40 (10) on following dates for respective reporting period:

Sr. No.	Description	Due date of intimation	Date of Intimation
1	Half yearly compliance certificate (March, 2019)	30/04/2019	26/04/2019
2	Half yearly compliance certificate (September, 2019)	31/10/2019	16/10/2019
3	Half yearly compliance certificate (March, 2020)	30/04/2019 Extended up to 31/05/2020	23/05/2020

26. The listed entity has not declared dividend during the reporting period and hence no amount was supposed to be deposited in a Separate Bank account for the said purpose.
27. The Company has provided E-voting facility to its shareholders under Regulation 44(2) of the SEBI (Listing Obligation and Disclosure Requirements) Regulation, 2015 and has complied with the requirement of the said Clause. Under Regulation 44(3), the listed entity has submitted the voting results of AGM held within prescribed time of 48 hours as below:

Meeting Date	Meeting Type	Meeting ended	Reporting time to BSE (Shareholder Meeting / Postal Ballot-Outcome of AGM)
27-09-2019	Annual General Meeting	27-09-2019	Voting Results were uploaded on 28/09/2019 at 07:07 PM.

28. The Company has paid listing fee and annual listing. The company has also paid annual custodial fee to the depositories as specified by SEBI.
29. The Company maintains a functional website (<http://www.islconsulting.in>) which contains all the required basic information about the company. The Company has also posted Annual Reports, Corporate Governance Report, Shareholding Pattern and Code of Conduct on its website.



30. Pursuant to Regulation 47, the listed entity has made following – advertisements in newspaper:

Sr. No.	Description	Date of Meeting	Date of Advertisement
1	Board Meeting	12/12/2019	14/12/2019
2	Board Meeting	06/02/2020	07/02/2020
3	Board Meeting	29/06/2020	01/07/2020
4	Annual General Meeting Notice	27/09/2019	31/08/2019

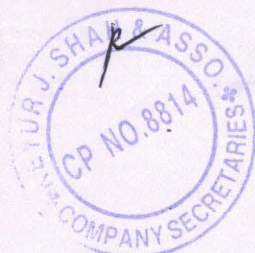
31. The listed entity has not increased/reduced its authorized share capital and there was no allotment, redemption or buy back of the any securities of the company during the year.

32. Following prosecution has been initiated or shows-cause notice issued for any offense, to the Company during the year, under this Act;

(a) Notice was issued by BSE for Late submission of Annual report for the year ended March, 2019. The BSE imposed a penalty via exchange letter dated 15.10.2019 under Regulation 34 of LODR on account of late submission of Annual report prescribed under this regulation. In respect of which, the Company has made clarification dated 16.10.2019 and the said levied fine was withdrawn by BSE dated 07.01.2020.

33. The listed entity has submitted the Reconciliation of Share Capital Audit Report under Regulation 55A of the SEBI (Depositories and Participants) Regulations, 1996 as detailed below:

Sr. No.	Description	Due date of Intimation	Date of Intimation
1	Reconciliation of Share Capital Audit for Quarter ending March, 2019	30/04/2019	26/04/2019
2	Reconciliation of Share Capital Audit for Quarter ending June, 2019	30/07/2019	11/07/2019
3	Reconciliation of Share Capital Audit Quarter ending September, 2019	30/10/2019	16/10/2019
4	Reconciliation of Share Capital Audit Quarter ending December, 2019	30/01/2020	22/01/2020



5	Reconciliation of Share Capital Audit Quarter ending March, 2020	30/04/2020  Extended up to 31/05/2020  Via SEBI's Circular no. SEBI/HO/MIRSD/RTAM B/CIR/P/2020/59 dated 13.04.2020	23/05/2020
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34. Following chapters of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 **are not applicable** to the listed entity:

<b>CHAPTER V</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS NON-CONVERTIBLE DEBT SECURITIES OR NON-CONVERTIBLE REDEEMABLE PREFERENCE SHARES OR BOTH
<b>CHAPTER VI</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS SPECIFIED SECURITIES AND EITHER NON-CONVERTIBLE DEBT SECURITIES OR NON-CONVERTIBLE REDEEMABLE PREFERENCE SHARES OR BOTH
<b>CHAPTER VII</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS INDIAN DEPOSITORY RECEIPTS
<b>CHAPTER VIII</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS SECURITISED DEBT INSTRUMENTS
<b>CHAPTER VIIIA</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS SECURITY RECEIPTS
<b>CHAPTER IX</b>	OBLIGATIONS OF LISTED ENTITY WHICH HAS LISTED ITS MUTUAL FUND UNITS

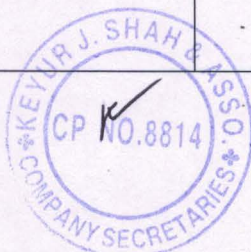


**Annexure-2**

**The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011**

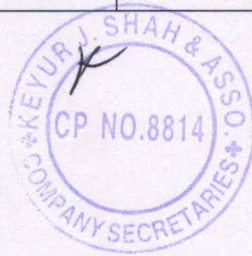
Information regarding documents, forms, returns, notices, intimations, etc. filed during the audit period, with the stock exchanges under The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011.

Sr. No.	Description	Relevant provision under which filed	No. Of shares	Date of Acquisition	Due date of intimation	Date of Disclosure
1	Disclosure to Exchange (BSE)	Disclosure under Regulation 29(2) of SEBI (SAST) Regulations, 2011 for disclosure for every acquisition or disposal of shares by shareholder who already holds more than 5% in Target Company	4000	13/11/2019	15/11/2019	15/11/2019  Belongs to Promoter Group
			10700	14/11/2019	16/11/2019	
			4000	15/11/2019	17/11/2019	
2			9400	18/11/2019	20/11/2019	20/11/2019  Belongs to Promoter Group
			13500	19/11/2019	21/11/2019	
			5400	20/11/2019	22/11/2019	
3			7500	21/11/2019	23/11/2019	22/11/2019
4			7000	13/11/2019	15/11/2019	26/11/2019  Belongs to non-promoter group. And the percentage of shares acquired was 0.16% which is less than 2% and thus the said intimation was not mandatory
			5000	06/11/2019	08/11/2019	
			2500	07/11/2019	09/11/2019	
			3000	11/11/2019	13/11/2019	
			4000	13/11/2019	15/11/2019	
			5000	14/11/2019	16/11/2019	
			1000	15/11/2019	17/11/2019	
			3000	18/11/2019	20/11/2019	
			5000	19/11/2019	21/11/2019	
			2000	20/11/2019	22/11/2019	
			2000	21/11/2019	23/11/2019	
5			14000	11/03/2020	13/03/2020	18/03/2020  Belongs to non-promoter group. And the percentage of shares acquired was 0.12% which is less than 2% and thus the said
			10000	11/03/2020	13/03/2020	
			5000	12/03/2020	14/03/2020	





						intimation was not mandatory.
6			10000	18/03/2020	20/03/2020	20/03/2020
			5000	19/03/2020	20/03/2020	
1	Continual Disclosure	Reg 30(1) & 30(2) of SEBI (SAST) Reg, 2011 regarding disclosure by every person who together with persons acting in concert to exercise 25% or more of the voting rights in target Company	<p>For the year ended 31.03.2019, Disclosure was made by Ms. Reema Shah dated 03.04.2019.</p> <p>For the year ended 31.03.2020, Disclosure was made by Ms. Reema Shah dated 21.05.2020</p>			



**Securities and Exchange Board of India (Prohibition of Insider Trading)  
Regulations, 2015**

Information regarding documents, forms, returns, notices, intimations, etc filed during the audit period, with the stock exchanges under The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Description	Relevant provision under which filed	Date of filing
1	Disclosure to Stock Exchange (BSE)	Regulation 7 (2) read with Regulation 6(2)	15/11/2019
2			20/11/2019
3			22/11/2019

1. The company has formulated a Code of Conduct for Insider Trading as provided in the SEBI Regulations.
2. The company has appointed Ms. Disha Shah, Company Secretary as compliance officer of the company with effect from 29.05.2020 who take care of the all the compliances related to company.

