

Registered Office :
203, Abhijeet - 1,
Mithakhali Six Roads,
Ellisbridge, Ahmedabad-380006.
Ph. : + 91-79-26423365/66
Fax : +91-79-26423367
E-mail : koeil@yahoo.com
Website : www.kanel.in
CIN : L15140GJ1992PLCO17024



KANEL INDUSTRIES LTD.

Date: July 30, 2020

To,
Department of Corporate Services
Bombay Stock Exchange Limited
Floor 25, P. J. Towers,
Dalal Street,
Mumbai - 400 001

Dear Sir,

Sub: Annual Secretarial Compliance Report for the Financial Year 2019-2020.
Ref: Kanel Industries Limited (Scrip Code: 500236)

With regard to the captioned subject and in accordance with Regulation 24A of SEBI (Listing obligation and Disclosure requirements) Regulations 2015, Please find enclosed herewith Annual Secretarial Compliance Report, issued by a practicing Company Secretary based on a check of the compliance by our company with the applicable SEBI Regulations and circulars/guidelines issued there under.

Accordingly, we are attaching herewith the Annual Secretarial Compliance Report of the company issued by Himanshu S K Gupta & Associates, Practicing Company Secretary for the Financial Year 2019-20.

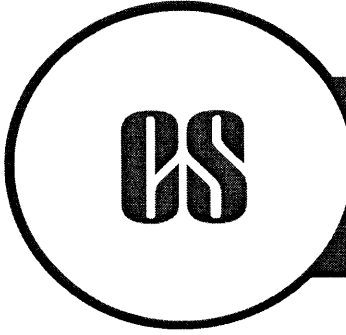
Thanking You,

Yours faithfully,
For, Kanel Industries Limited


Hitesh Thakkar
Director
DIN: 00610006



Encl: As above



Himanshu S K Gupta & Associates Company Secretaries

SECRETARIAL COMPLIANCE REPORT OF "KANEL INDUSTRIES LIMITED" FOR THE YEAR ENDED 31ST MARCH, 2020

I, Himanshu Gupta, Practising Company Secretary have examined:

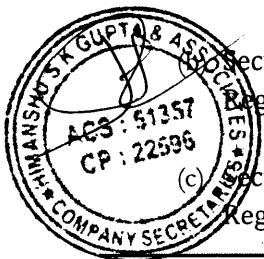
- all the documents and records made available to me and explanation provided by **KANEL INDUSTRIES LIMITED** ("the listed entity") through electronically by way of scan copy or soft copy through mail due to lockdown on account of COVID-19 during the conduct of audit of the company.
- the filings/ submissions made by the listed entity to the stock exchanges,
- website of the listed entity,
- any other document/filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st March, 2020 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended from time to time;
- Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (not attracted during the period under review)
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;



E-mail: himanshugupta@live.com

(M): +91-9033 9077 34

Office: 203, Abhijeet-1, Mithakhali Six Roads, Ellisbridge, Ahmedabad - 380006, Gujarat.

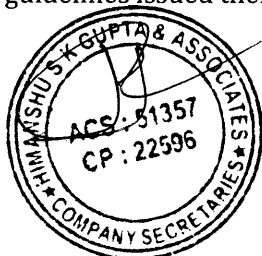
- (d) Securities and Exchange Board of India (Buy back of Securities) Regulations, 2018; **(not attracted during the period under review)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(not attracted during the period under review)**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(not attracted during the period under review)**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **(not attracted during year under review)**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;
- (i) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993
- (j) SEBI (Depositories and Participant) Regulations, 2018, as amended from time to time; and circulars/ guidelines issued thereunder;

and based on the above examination and considering the relaxations granted by the Ministry of Corporate Affairs and Securities and Exchange Board of India warranted due to the spread of the COVID-19 pandemic, I hereby report that, during the Period under review:

- (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	Observations/ Remarks of the Practicing Company Secretary
1	Payment of Listing fees and Annual Issuer Charges under Regulation 14 of SEBI LODR	Late Payment	Company has paid the listing fees to the stock exchanges and Depositories after due date.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my 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 E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	Bombay Stock Exchange	Non-payment of Listing Fees on time.	Stock exchange had froze the demat accounts of the promoters of the company for non-payment of listing fees on time.	As informed by the management of the company, company has paid the listing fees on 02/03/2020 to BSE, However the demat accounts of the promoters of the company are still showing frozen.

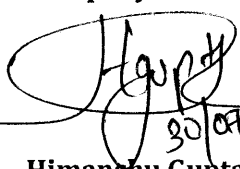
(d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Fines imposed by exchange for Late submission of various compliances	31.03.2019	Company had submitted all the pending compliances and made the payment of fines imposed.	Company had submitted all the pending compliances and made the payment of fines imposed and revoke the suspension of their trading of shares.

I further report that, the listed entity has complied with points 6(A) and 6(B) as mentioned in circular No. CIR/CFD/CMD 1/114/2019 dated 18th October, 2019 and that they have incorporated all the terms and conditions in the respective engagement letter/supplemental letter issued to the Statutory Auditors.

Place: Ahmedabad
Date: 30 July, 2020

For, Himanshu SK Gupta & Associates
Company Secretaries


30/07/20

Himanshu Gupta
Proprietor

ACS No.: 51357

C.P. No.: 22596

UDIN: A051357B000529043

