

Dated: 25th May, 2019

To
The Chairman
Board of Directors of
M/s Aditya Spinners Limited
Durganagar Colony,
Hyderabad-500082

Dear Sir,

ANNUAL SECRETARIAL COMPLIANCE REPORT PURSUANT TO SEBI CIRCULAR

In compliance with SEBI Circular no. CIR/CFD/CMD 1/27/2019 dated 08th February, 2019, we are submitting the Annual Secretarial Compliance Report dated 25th May, 2019 for the year ended 31st March, 2019.

Thanking you,

Yours faithfully,
K.SWAMYANDCO
Company Secretaries



(K. SWAMY)
CP.NO.2013, MNO.F3743



SECRETARIAL COMPLIANCE REPORT OF M/S ADITYA SPINNERS LIMITED FOR THE
YEAR ENDED 31ST MARCH, 2019

I, K. Swamy, Proprietor of M/s K. Swamy and Co., have examined:

- (a) all the documents and records made available to me and explanation provided by M/s Aditya Spinners 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 31st March, 2019 ("Review Period") in respect of compliances 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;

(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;

*(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;

and circulars/ guidelines issued thereunder;

*No event took place under these Regulations during the review period.



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, 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
01.	-----None-----		

(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/re marks of the Practicing Company Secretary, if any.
01.	-----None-----			

(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.... (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
This being the first reporting since the notification of the requirement to submit this report, reporting on actions to comply with the observations made in previous reports is not applicable.				

Place: Secunderabad,
Date : 25th May, 2019

For K. SWAMY AND CO.,
COMPANY SECRETARIES


K. SWAMY
PROPRIETOR



CP NO.2013, M.NO. F3743