

Date: 30.05.2019

The Listing Department,  
BSE Ltd. (Designated Stock Exchange)  
PJ Towers, Dalal Street,  
Mumbai- 400 001

The Listing Department,  
National Stock Exchange of India Ltd.  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (E),  
Mumbai – 400 051

**Stock Code: BSE: 532925**

**NSE: KAUSHALYA**

Dear Sir /Madam,

**Sub: Annual Secretarial Compliance Report for year ended March 31, 2019**

In compliance to Regulation 24A of SEBI (LODR) Regulations, 2015 read with SEBI circular no. CIRICFD/CMD1/27/2019 dated February 08, 2019; please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March, 31, 2019, issued by CS Atul Khater, Practicing Company Secretary.


This is for your reference, record and information.

Thanking You,

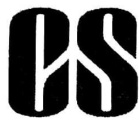
Yours Faithfully

*For Kaushalya Infrastructure Development Corporation Ltd.*

**Kaushalya Infrastructure Dev. Corporation Ltd**

  
Sanjay Lal Gupta  
Company Secretary

Encl: As above



**ATUL KHATER (CS & B.com)**

**Practicing Company Secretary**

**Address: 83, R.K. Street, Anand Bhavan,**

**Dist: Hooghly, Uttarpara - 712258**

**Email id: [atulkhater@gmail.com](mailto:atulkhater@gmail.com)**

**Mb: 9681885909/8777636004**

**SECRETARIAL COMPLIANCE REPORT OF  
KAUSHALYA INFRASTRUCTURE DEVELOPMENT CORPORATION LTD.  
FOR THE FINANCIAL YEAR ENDED ON 31ST MARCH, 2019  
[Pursuant to Circular No. CIR/CFD/CMDI/27/2019 dated 08/02/2019 issued by  
Securities and Exchange Board of India]**

To,  
The Members,  
Kaushalya Infrastructure Development Corporation Ltd.  
HB-170, Sector-III, Salt Lake,  
Kolkata-700 106

I have examined:

- (a) all the documents and records made available to us and explanation provided by M/s. Kaushalya Infrastructure Development Corporation Ltd. ("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 on 31st March, 2019 ("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 for the review 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 for the review period**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; -**Not Applicable for the review period**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; -**Not Applicable for the review period**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; -**Not Applicable for the review period**

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

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:-

1. Sr. No	2. Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	3. Deviations	4. Observations/ Remarks of the Practicing Company Secretary
1.	Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018	Not Applicable	The Regulation mentioned in the column no. 2 is not applicable to the Company
2.	Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018	Not Applicable	The Regulation mentioned in the column no. 2 is not applicable to the Company
3.	Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014	Not Applicable	The Regulation mentioned in the column no. 2 is not applicable to the Company



4.	Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008	Not Applicable	The Regulation mentioned in the column no. 2 is not applicable to the Company
5.	Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013	Not Applicable	The Regulation mentioned in the column no. 2 is not applicable to the Company

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/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 e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NA	NA	NA	NA	NA

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: Not Applicable



*Atul Khater*  
 (Atul Khater)  
 Practicing Company Secretary  
 Membership No.: 48472  
 C.P No.: 19148

Place: Kolkata  
 Date: 30.05.2019