



KAMANWALA HOUSING CONSTRUCTION LIMITED

REGD. & ADMINISTRATIVE OFFICE: 135/406, NEW UDYOG MANDIR - 2,
MOGUL LANE, MAHIM (WEST), MUMBAI - 400 016.
Tel.: 2444 0601, 2445 6029, 2447 4983 • Email : kamanwala@gmail.com
Website : www.kamanwalahousing.com CIN: L65990MH1984PLC032655

May 22, 2019

To,
BSE Limited,
1st Floor, Rotunda Building,
B.S. Marg, Fort, Mumbai - 400 001

Dear Sir,

Sub: Submission of Secretarial Compliance Report under Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2018.

Ref: Scrip Code: 511131 Scrip Name: KAMANWALA

With Reference to the above-mentioned subject, we are attaching herewith Secretarial Compliance Report for the year ended 31st March, 2019 given by m/s. Devesh Mehta & Associates, Practicing Company Secretaries, Bhavnagar in compliance of Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2018 read with SEBI circular no - CIR/CFD/CMD1/27/2019 dated February 8, 2019.

You are requested to kindly take the same on your records.

Thanking you,

Yours faithfully,

For, Kamanwala Housing Construction Limited

SA Desai



Sejal Desai
Company Secretary & Compliance Officer
Encl: as stated



DEVESH MEHTA

& ASSOCIATES

COMPANY SECRETARY

Secretarial Compliance Report of
KAMANWALA HOUSING CONSTRUCTION LIMITED
for the year ended 31st March 2019

We, Devesh Mehta & Associates, Practicing Company Secretaries have examined:

- 1) all the documents and records made available to us and explanation provided by KAMANWALA HOUSING CONSTRUCTION LIMITED — CIN L65990MH1984PLC032655 ("the listed entity"),
- 2) the filings/ submissions made by the listed entity to the stock exchanges,
- 3) website of the listed entity,
- 4) any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended 31.3.2019 ("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 for the financial year ended 31.03.2019 ("Review Period"), 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;

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- 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;
- i) Securities and Exchange Board of India (Depository and Participants) Regulations, 2018;

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	Observations/ Remarks of the Practicing Company Secretary

However, regulations mentioned above under clause (d), (e), (f) & (g) are not applicable to the Company during the review period;

- 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 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:



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Sr. No.	Action Taken by	Details of violations	Details of action taken e.g. fines, remarks of the warning letter, Practicing debarment, etc.	Observations/remarks of the Practicing Company Secretary, if any.

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	Action Taken by Listed Entity, if any	Comments of the Practicing Company Secretary on the Action Taken by Listed Entity

Not Applicable

DEVESH MEHTA & ASSOCIATES



Devesh

PROPRIETOR

DEVESH UPENDRA MEHTA
PROPRIETOR
FOR DEVESH MEHTA & ASSOCIATES
PRACTICING COMPANY SECRETARIES
ACS No.: 45544 C. P. No.: 16649

Date : 21st May, 2019
Place : Bhavnagar

Office At: 208, RATNADEEP COMPLEX, ABOVE ICICI BANK, NR. CENTRAL SALT, WAGHAWADI ROAD, BHAVNAGAR-364001

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