

LATL:CS:SCR:2019-20

Date : 29.05.2019

BSE Limited  
1st Floor, Rotunda Building  
P.J. Towers, Dalal Street, Fort  
Mumbai- 400 001

The National Stock Exchange of India Limited  
Listing Department  
Exchange Plaza, C-1 Block G,  
Bandra Kurla Complex,  
Bandra (E), Mumbai- 400051

Company Code: 532796

Company Code: LUMAXTECH

Sub.: Annual Secretarial Compliance Report pursuant to Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 i.e. "Listing Regulations".

Sir/Ma'am,

Pursuant to Regulation 24A of Listing Regulations read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, kindly find enclosed Secretarial Compliance Report of the Company issued by Mr. I. U. Thakur, Practicing Company Secretary and Lumax DK Auto Industries Limited (Unlisted Material Subsidiary of the Company) issued by Mr. Prabhakar Kumar, Partner of VAPN & Associates, Company Secretaries for the Financial Year ended 31<sup>st</sup> March 2019.

This is for your information and record please.

Thanking you,

Yours faithfully,

For **LUMAX AUTO TECHNOLOGIES LIMITED**



**Anil Tyagi,**  
**Company Secretary & Compliance officer**  
**M. No.: A-16825**

Encl. : as above



Secretarial compliance Report of **LUMAX AUTO TECHNOLOGIES LIMITED** for the year ended 31<sup>st</sup> March, 2019.

To,  
**LUMAX AUTO TECHNOLOGIES LIMITED**  
2nd Floor, Harbans Bhawan-II,  
Commercial Complex, Nangal Raya,  
New Delhi South West Delhi DL  
110046 IN

I, I.U. Thakur have examined:

- (a) All the documents and records made available to us and explanation provided by LUMAX AUTO TECHNOLOGIES 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 31<sup>st</sup> 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-
- (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** to the Company during the Audit Period;



- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014-**Not applicable** to the Company during the Audit Period;
- (f) Securities and Exchange Board of India (Issue and listing of Debt Securities) Regulations, 2008- **Not applicable** to the Company during the Audit Period;
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013- **Not applicable** to the Company during the Audit Period;
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018

and circulars / guidelines issued thereunder;

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
1			

- (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/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	Details of Violations	Details of action Taken e.g. fines, warning letter, 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 the previous reports: **Not Applicable**

Sr. No.	Observations of the Practicing company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March, 2018	Actions taken by the listed entity, if any.	Comments of the Practicing company Secretary on the actions taken by the listed entity

Place: Pune  
Date: 28/05/2019

Signature:   
**I. U Thakur**  
Practicing Company Secretary  
FCS No.2298  
C.P. No.1402







# VAPN & ASSOCIATES.

COMPANY SECRETARIES

**Secretarial Compliance Report of LUMAX DK AUTO INDUSTRIES LIMITED, unlisted material subsidiary Company of listed entity LUMAX AUTO TECHNOLOGIES LIMITED for the financial year ended March 31, 2019**

I have examined:

- (a) all the documents and records made available to us and explanation provided by **LUMAX DK AUTO INDUSTRIES LIMITED** ("unlisted material subsidiary Company of listed entity **LUMAX AUTO TECHNOLOGIES LIMITED**"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges (not applicable being unlisted company),
- (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 March 31, 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



# VAPN & ASSOCIATES.

COMPANY SECRETARIES

- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **[Not applicable as there was no reportable event during the period under the Review];**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; 2018 **[Not applicable as there was no reportable event during the period under the Review]**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; 2018 **[Not applicable as there was no reportable event during the period under the Review]**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013; **[Not applicable as there was no reportable event during the period under the Review];**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; 2018 **[Not applicable as there was no reportable event during the period under the Review]**

and based on the above examination, I hereby report that, during the Review Period:

- (a) The unlisted entity Lumax DK Auto Industries Limited has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, wherever, it is applicable,
- (b) The unlisted entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar 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 an
-----NIL-----				



# VAPN & ASSOCIATES.

COMPANY SECRETARIES

(d) The unlisted entity has taken the following actions to comply with the observations made in previous reports: **[Not applicable as this being the First Report];**

For VAPN & Associates  
Company Secretaries

Prabhakar Kumar  
Partner  
FCS No. 5781  
CP No. 10630



Place: New Delhi  
Date: 01<sup>st</sup> May, 2019