

# KOME-ON COMMUNICATION LTD

CIN: L74110GJ1994PLC021216

Block No. Block Number 338/Paiky 6/2, Dhamdachi Village, Tal & Dist. Valsad, GJ 396001.

Email ID: info@komeon.in //Tel. No: 67085160 //Web: www.komeon.in

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5<sup>th</sup> June, ,2020

To,  
The Bombay Stock Exchange Ltd.,  
Corporate Relationship Dept,  
1st Floor, New Trading Ring,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort, Mumbai-400 001

**Scrip Code: BSE 539910**

**Subject: - Submission of Annual Secretarial Compliance Report for year ended 31st March 2020  
pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements), 2015**

Dear Sir / Madam,

With reference to the above, please find enclosed herewith the copy of the Annual Secretarial Compliance Report for year ended 31st March 2020 issued by M/s. Aditya Shah & Associates, Practicing Company Secretaries pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements), 2015.

This is for your information and record.

Thanking you.

Yours Faithfully,

For **Kome-on Communication Limited**

**Sd/-**

**Harshad Thorve**

**Director**

**DIN:06605949**

**Aditya Shah & Associates**  
**PRACTICING COMPANY SECRETARIES**  
**AUTHORISED AGENTS FOR TRADEMARKS**

**CS ADITYA SHAH**

A.C.S., B Com., D.L.L. & L.W.

M. No – 58883; COP – 22912; Trademarks Agent Code No: 33226

Office No. F-137, Lower Level, 1st Floor, Raghuleela Mega Mall, Poisar Gymkhana Road, Near Poisar Bus Depot, Kandivali (W), Mumbai - 400 067.

**Mob : 8655757004 | Email : aditya@csadityashah.co.in**

To,  
The Board of,  
Kome – On Communication Limited,  
Block No. 338/Paiky 6/2, Dhamdachi Village,  
Tal & Dist. Valsad, Valsad, Ahmedabad – 396001.

**Subject: Annual Secretarial Compliance Report for the financial year 2019 – 2020.**

**Dear Madam / Sir,**


We have been engaged by Kome – On Communication Limited (“the Company”) having CIN L74110GJ1994PLC021216, whose equity shares are listed on Bombay Stock Exchange, to conduct an audit in terms of Regulation 24 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended read with SEBI’s circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February, 2019, and to issue Annual Secretarial Compliance Report thereon.

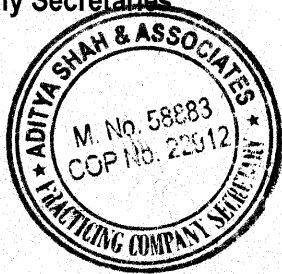
It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations and circulars/ guidelines issued there under from time to time and to ensure that the systems are adequate and are operating effectively.

Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations and circulars / guidelines issued there under from time to time and issue a report thereon.

Our audit was conducted in accordance with Guidance Note on Annual Secretarial Compliance Report issued by the Institute of Company Secretaries of India and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose. Annual Secretarial Compliance Report is enclosed.

For Aditya Shah & Associates,  
Practicing Company Secretaries

  
Aditya Shah  
Proprietor  
M. No: 58883  
COP No: 22912  
Place: Mumbai.  
Date: 04/06/2020.



# Aditya Shah & Associates

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### Secretarial Compliance Report of Kome – On Communication Limited for the year ended 31<sup>st</sup> March, 2020.

1. I, Aditya Shah, Proprietor of Aditya Shah & Associates, Practicing Company Secretaries, have examined:

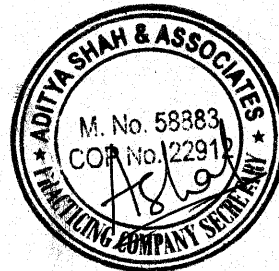
- a) all the documents and records made available to me and explanation provided by Kome – On Communication Limited (“the listed entity”) arising from the compliances of specific Regulations listed under Clause 2 of this report;
- b) the filings or submissions made by the Listed Entity to the Stock Exchanges in connection with the above;
- c) website of the listed entity; and
- d) all other documents, filings or submission on the basis of which this certification is given

for the year ended 31<sup>st</sup> March, 2020 (“Review Period”) in respect of compliance with the provisions of:

- i. The Securities and Exchange Board of India Act, 1992 (“SEBI Act”) and the Regulations, circulars, guidelines issued there under; and
- ii. The Securities Contracts (Regulation) Act, 1956 (“SCRA”), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“SEBI”);

2. The Specific Regulations, whose provisions and the circulars / guidelines issued there under, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;



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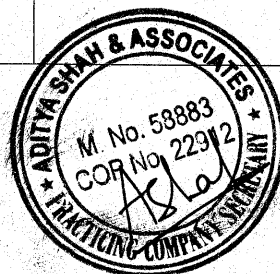
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- b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not applicable during the period under review)**
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; **(Not applicable during the period under review)**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not applicable during the period under review)**
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not applicable 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 applicable during the period under review)**
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- i) all other regulation and circulars / guidelines issued and as applicable to the Company from time to time

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 there under, 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	SEBI / CIR / ISD / 3 / 2011	All promoter's shareholding should be in Demat form.	As per the said circular and SEBI (LODR) Regulations, 2015, 100 % promoters shareholding was not in Demat mode.



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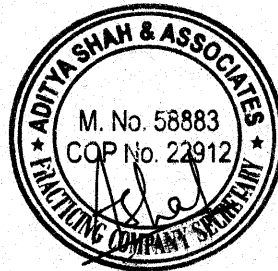
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- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my/our examination of those records.
- c) The following are the details of actions 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 there under:

Sr. No	Action Taken by	Details of Violation	Details of action taken. Eg: Fines, Warning Letter, Debarment. Etc.	Observations / Remarks of the Practicing Company Secretary, if any
NIL				

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

Sr. No	Observations of the PCS in the Previous Reports	Observations made in the Secretarial Compliance Report for the year ended ____	Actions taken by the Listed Entity, if any.	Comments of the PCS on the actions taken by the listed entity.
1	As per the said circular and SEBI (LODR) Regulations, 2015, 100% promoter's holdings was not in Demat mode.	NA	The Listed Company is in the process of complying with the same.	The Listed Company has ensured to complied with the same as soon as possible.



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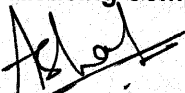
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2	The Company fails to publish the quarterly financial results for with respect to Regulation 47 of SEBI (LODR) Regulations, 2015.	NA	The Listed Company has made a compliance checklist for the same.	The Listed Company has made a compliance checklist for the same to ensure that the compliances has been done on timely basis.
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For Aditya Shah & Associates,  
Practicing Company Secretaries

  
Aditya Shah  
Proprietor



M. No: 58883  
COP No: 22912

Place: Mumbai.  
Date: 04/06/2020.

UDIN: A058883B000318208.