



CS. Shrinivas M Devadiga

COMPANY SECRETARY

Bangalore

ANNAUL SECRETARIAL COMPLIANCE REPORT OF
M/s ICDS LIMITED FOR THE YEAR ENDING 31ST MARCH 2019

[Pursuant to Circular No. CIR/CFD/CMD 1/27/2019 Dated February 08, 2019
Issued by Securities and Exchange Board of India]

I, SHRINIVAS MUTTA DEVADIGA, Practicing Company Secretary, have examined:

- a) All the documents and records made available to us and explanation provided by ICDS limited ("the listed entity")
- b) The filings/submissions made by the ICDS limited to the BSE Limited (BSE) and National Stock Exchange of India Limited (NSE). (However, shares are presently suspended for Trading. Company already filed revocation application in both stock exchanges, which is in advanced stage)
- c) The website of the listed entity (www.icdslimited.com)
- 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 in respect of compliance with the provisions of:

- a) The **Securities and Exchange Board of India Act, 1992** and the regulations, circulars, guidelines issued thereunder;
- b) The **Securities Contracts (Regulations) Act, 1956**, rules made thereunder and the Regulations, Circulars, guidelines issued thereunder by the Securities and Exchange Board of India;

The specific Regulations whose provisions and the circulars/guidelines issued thereunder have been examined include:

- a. The Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
- b. The Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c. The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- d. The Securities and Exchange Board of India (Registrars to an Issue and



No.105 Munireddy Building, Gear International School Road, Karmelaram Post, Doddakannelli,
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Mumbai



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Share Transfer Agents) Regulations, 1993 regarding the companies act and dealing with clients.

- e. The Securities and Exchange Board of India (Depositories & Participants) Regulations, 2018

And based on 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:

Sl. No	Compliance Requirement (Regulations/ guidelines specific clause)	Requirement circulars/ including	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Nil		Nil	Nil

- b) ICDS 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 Company/ 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 Act Regulations/and circulars/guidelines issued thereunder:

Sl. 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.
1.	Nil	Nil	Nil	



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- d) The listed entity has taken the following actions to comply with the observations made in previous reports (Not applicable since this being the first year report) :

Sl. No.	Observations of the Practicing Company Secretary 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 Practicing Company Secretary on the actions taken by the listed entity
1.	NA	NA	NA	NA

Signature :

Name :

Membership No. :

COP No. :

:

:

:

:



: Shrinivas Muttta Devadiga

: 22381

: 10372

Place : Manipal

Date : 24/05/2019

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