



**Indo Thai**  
trade with confidence

**Indo Thai Securities Ltd.**

CIN : L67120MP1995PLC008959

Corporate Member : NSE | BSE | MSEI | DP-CDSL

28<sup>th</sup> May, 2019

To,  
The Listing Department  
**BSE Limited**  
Department of Corporate Affairs  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400 001

To,  
The Listing Department  
**National Stock Exchange of India Ltd.**  
Exchange Plaza, Plot No. C/1, G Block  
Bandra-Kurla Complex,  
Bandra (E)  
Mumbai - 400 051

Dear Sir/Madam,

**Sub. : Submission of Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2019**

**Ref. : ISIN - INE337M01013; Scrip ID-533676; Scrip Code-INDOTHAI**

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended, read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, we hereby submit the Annual Secretarial Compliance Report duly issued by M/s Kaushal Ameta & Co., Practicing Company Secretary, for the financial year ended on 31<sup>st</sup> March, 2019.

This is for your information and records.

Thanking you,

Yours truly,

**For Indo Thai Securities Limited**

**Sanjay Kushwah**

(Company Secretary cum Compliance Officer)

Membership No.: A49437



**ANNUAL SECRETARIAL COMPLIANCE REPORT  
(For the financial year ended 31<sup>st</sup> March, 2019)**

Pursuant to regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

To,

**Indo Thai Securities Limited**

Capital Tower, 2<sup>nd</sup> Floor,

Plot Nos. 169A-171, PU-4, Scheme No. - 54,

Indore (M.P.) - 452010

We have examined:

(a) all the documents and records made available to us and explanation provided by **Indo Thai Securities 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 **2018-19** ("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 on the Company during the reporting period under Audit)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) The Securities and Exchange Board of India (Stock Brokers and Sub-brokers) Regulations, 1992;
- (e) The Securities and Exchange Board of India (Issue and Listing of Debt Securities) regulations, 2008; (Not applicable on the Company during the reporting period under Audit)
- (f) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable on the Company during the reporting period under Audit)

*Kaushal Ameta*  


- (g) The Securities and Exchange Board of India (Employee Stock Option Scheme and Employee Stock Purchase Scheme) Guidelines, 1999 and the Securities and Exchange Board of India (Share Based Employee Benefits) Regulation, 2014. (Not applicable on the Company during the reporting period under Audit).
- (h) Securities and Exchange Board of India (Issue and Listing of Non Convertible and Redeemable Preference Shares) Regulations, 2013; (Not applicable on the Company during the reporting period under Audit).
- (i) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (j) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 as amended from time to time;
- (k) The Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
- (l) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009 as amended from time to time. (Not applicable on the Company during the reporting period under Audit);
- (m) Foreign Exchange Management Act, 1999 and the Rules and Regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investments and External Commercial Borrowings;
- (n) The Company has complied with the requirements under the Equity Listing Agreements entered into with BSE Limited and National Stock Exchange of India Limited;

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:

S. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviation	Observations/Remarks of Practicing Company Secretary
None			

- (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:

S. No	Action taken by	Details of violation	of	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NIL					

Kehul A. A.  
Kaushtal Ameta & Co.  
INDORE  
Company Secretary

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

S. No.	Observations of the Practicing Company Secretary in the previous report	Observations made in the Secretarial compliance report for the year ended...(The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE				

Place: Indore  
Date: 23<sup>rd</sup> May, 2019



For Kaushal Ameta & Co.

*Kaushal Ameta*

**Kaushal Ameta (Proprietor)**  
Practicing Company Secretary  
Mem. No. F8144, CP No. - 9103