

**Registered Office :**  
203, Abhijeet - 1,  
Mithakhali Six Roads,  
Ellisbridge, Ahmedabad-380006.  
Ph. : + 91-79-26423365/66  
Fax : +91-79-26423367  
E-mail : koeil@yahoo.com  
Website : www.kanel.in  
CIN : L15140GJ1992PLCO17024



**KANEL INDUSTRIES LTD.**

Date: May 29, 2019

To,  
Department of Corporate Services  
Bombay Stock Exchange Limited  
Floor 25, P. J. Towers,  
Dalal Street,  
Mumbai - 400 001

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Financial Year 2018-2019.**  
**Ref: Kanel Industries Limited (Scrip Code: 500236)**

Pursuant to SEBI Circular dated February 8, 2019, all listed entities are required to submit to the Stock Exchange within 60 days of the end of the financial year, Annual Secretarial Compliance Report, issued by a practicing Company Secretary based on a check of the compliance by such listed entity with the applicable SEBI Regulations and circulars/guidelines issued there under.

Accordingly, we are attaching herewith the Annual Secretarial Compliance Report of the company issued by Chintan K. Patel, Practicing Company Secretary for the Financial Year 2018-19.

Thanking You,

Yours faithfully,  
**For, Kanel Industries Limited**

  
Dhiren K. Thakkar  
Managing Director  
DIN: 00610001



Encl: As above



**Secretarial Compliance Report of Kanel Industries Limited for the year ended March 31, 2019.**

I, **Chintan K. Patel, Practicing Company Secretary** have examined:

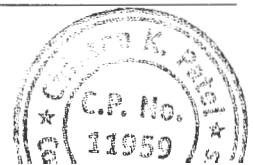
- (a) all the documents and records made available to me and explanation provided by **Kanel Industries Limited** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 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; **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.**





# Chintan K. Patel

## Company Secretaries

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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.
- (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 our examination of those records.
- (c) No 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.

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 any.
1.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 30/09/2014	Fine of Rs. 10000 imposed by the Exchange	The Company had submitted the all pending Disclosures / Compliances with the Exchange and make payment of total fine of Rs. 20,79,868/- paid in the f.y. 2018-19.
2.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 31/12/2014	Fine of Rs. 9000 imposed by the Exchange	
3.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 31/03/2015	Fine of Rs. 2000 imposed by the Exchange	
4.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 30/06/2015	Fine of Rs. 15000 imposed by the Exchange	
5.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 31/12/2015	Fine of Rs. 226120 imposed by the Exchange	
6.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 31/03/2016	Fine of Rs. 244120 imposed by the Exchange	
7.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 30/06/2016	Fine of Rs. 276120 imposed by the Exchange	
8.	BSE Limited	Late Submission of Shareholding Pattern for the quarter ended 30/09/2016	Fine of Rs. 206000 imposed by the Exchange	
9.	BSE Limited	Late Submission of Financial Results for the quarter ended 31/03/2016	Fine of Rs. 339120 imposed by the Exchange	
10.	BSE Limited	Late Submission of Financial Results for the quarter ended 30/09/2016	Fine of Rs. 369120 imposed by the Exchange	
11.	BSE Limited	Late Submission of Corporate Governance Report for the quarter ended 30/09/2014	Fine of Rs. 4000 imposed by the Exchange	
12.	BSE Limited	Late Submission of Corporate Governance Report for the quarter ended 31/03/2015	Fine of Rs. 8000 imposed by the Exchange	
13.	BSE Limited	Late Submission of Corporate Governance Report for the quarter ended 30/06/2016	Fine of Rs. 39000 imposed by the Exchange	
14.	BSE Limited	Late Submission of Corporate Governance Report for the quarter ended 30/09/2016	Fine of Rs. 1000 imposed by the Exchange	
15.	BSE Limited	Late Submission of Annual Report for the year ended 31/03/2014	Fine of Rs. 14000 imposed by the Exchange	





# Chintan K. Patel

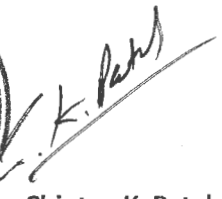
## Company Secretaries

---

- (d) This is first Secretarial Compliance Report, hence no action required to be taken by the listed entity to comply with the observations made in previous reports.

Place: Ahmedabad  
Date: May 29, 2019



  
Chintan K. Patel  
Proprietor  
Mem. no. A31987  
COP no. 11959