



Regd. Office : 456, Aggarwal Metro Heights,
Netaji Subhash Place, Pitampura, Delhi-110034
Telefax : 011-45645347 | E-mail : cubfinserv@yahoo.com
Website : cubicalrealtors.com
CIN No. : L65993DL1990PLC040101

Date: 29th May, 2019

The Manager,
Corporate Relationship Department,
Bombay Stock Exchange Limited,
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai-400001

BSE Scrip Code- 511710

Dear Sir/Madam,

Sub: Annual Secretarial Compliance report of the Company for the Year ended March 31, 2019

In compliance of Regulation 24A of SEBI (LODR) Regulations, 2015, Company has appointed M/s Mukesh Agarwal & Co., Practicing Company Secretaries, as Auditor of the Company for the financial year ended on 31 March, 2019. They have carried out the audit and submitted Annual Secretarial Compliance Report. We are enclosing the copy of the same for your record.

You are requested to take the above information in your records.

For Thanking You,
Yours faithfully,

For **CUBICAL FINANCIAL SERVICES LIMITED**

A handwritten signature in black ink, appearing to read "Ashwani Kumar Gupta", is written over a horizontal line.

(Ashwani Kumar Gupta)
Managing Director
DIN: 00348616

MUKESH AGARWAL & CO.

(COMPANY SECRETARIES)

3029, Sant Nagar, Rani Bagh, Opp. M2K Pitampura, Delhi-110034
Tel. No. : 011-42458279, 47060535 Email : magarwalandco@gmail.com

Ref. No.

Dated.....

SECRETARIAL COMPLIANCE REPORT OF CUBICAL FINANCIAL SERVICES LIMITED. FOR THE YEAR ENDED 31ST MARCH, 2019

[Pursuant to Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 as issued by SEBI]

We **Mukesh Agarwal & Co.** have examined:

- a) all the documents and records made available to us and explanation provided by **Cubical Financial Services 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 documents/ filings, as may be relevant, which has been relied upon to make this certification,

for the year ended 31st 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; (**Not Applicable to the Company during the Audit Period**)
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- d) Securities and Exchange Board of India (Buy back 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) and circulars / guidelines issued thereunder

and based upon the above examination, We hereby report that, during the Review Period:

- a) The Listed entity has complied with the provision of the above Regulations and circular/ 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 |
|--------|--|------------|---|
| 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:

| 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. |
|--------|-----------------|----------------------|---|--|
| | | | | |



None

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

| Sr. No | Observations of the Practicing Company Secretary in the previous reports | Observations made in the secretarial compliance report for the year ended 31 st march,2019 | Action taken by the Listed entity, if any | Comments of the Practicing Company Secretary on the actions taken by the listed entity |
|---|--|---|---|--|
| This being the first reporting since the notification of the requirements to submit the report, reporting on actions to comply with the observations made in the previous reports does not arise. | | | | |

Place: Delhi
Date: 28.05.2019

for Mukesh Agarwal & Company




Mukesh Kumar Agarwal
M No-F5991
C P No.3851