

Corp. Off : Survey No. 314/3, SDA Compound,  
Lasudia Mori, Dewas Naka, Indore - 452010 (M.P.)  
Ph. : 0731- 4217800 Fax - 0731- 4217867  
E-mail : info@groupsignet.com  
Web : www.groupsignet.com  
CIN No. : L51900MH1985PLC035202  
GST NO. - 23AABCS3489F2ZD



Date: 29<sup>th</sup> May, 2019

To, The Secretary National Stock Exchange of India Limited Exchange Plaza, BandraKurla Complex, Bandra (East), Mumbai-400051	To, The Corporate Relationship Department Bombay Stock Exchange Limited PhirozeJeejeebhoy Towers, Dalal Street, Mumbai- 400 001
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Ref: SIGNET INDUSTRIES LIMITED (ISIN: INE529F01035) BSE Code: 512131, NSE Symbol: SIGIND

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

Dear Sir/Madam,

Pursuant to SEBI Circular CIR /CFD / CMD1/ 27 /2019 dated February 8, 2019, please find attached herewith the Annual Secretarial Compliance Report of the Company for the year ended on 31<sup>st</sup> March, 2019.

Kindly take the same on your record.

Thanking You,  
Yours Faithfully,  
For Signet Industries Limited

Preeti Singh  
(Company Secretary)  
M.no A26118

M. Maheshwari & Associates  
Company Secretaries

Manish Maheshwari  
M.Com, LL.B., F.C.S.

301 Shalimar Corporate Centre,  
8-B South Tukoganj,  
Indore - 452 001  
P. 0731 4068730  
Cell. 98260 40473  
[mmaheshwarics@gmail.com](mailto:mmaheshwarics@gmail.com)

**Secretarial compliance report of  
SIGNET INDUSTRIES LIMITED FOR THE YEAR ENDED MARCH 31, 2019**

I Manish Maheshwari have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s Signet 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 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 (Issue of Capital and Disclosure Requirements) Regulations, 2018
- b) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

The company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms / returns under:



- a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- b) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- c) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- d) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;

and circulars/ guidelines issued thereunder;

And based on the above examination, I hereby report that, during the Review Period:

Following are the details:

- 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:-

Sr.No	Compliance Requirement Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Clause 4 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations 2015. Designated Person and their immediate relatives shall not trade during the period of closure of the trading window.	Mr. Mukesh Sangla, the Managing Director of the Company has purchased 114 shares on 22.01.2019 by oversight, i.e. after the closure of trading window from 22.01.2018 to 02.02.2019.	Mr. Mukesh Sangla, the Managing Director of the Company has purchased 114 shares in the open market immediately on next early trading day i.e. on 23.01.2019.

- 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 my 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:

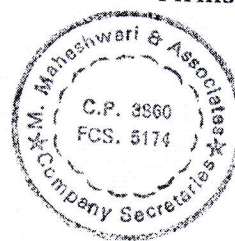


Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc	Observations/ remarks of the Practicing Company Secretary, if any
NIL				

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 31.03.2018	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not Applicable				

For M. Maheshwari & Associates  
Company Secretaries  
Firms U.C.N. I2001MP213000



*Manish Maheshwari*

Manish Maheshwari  
Proprietor  
FCS-5174  
CP-3860

Date : 29.05.2019  
Place : Indore