



MDS & Associates

Company Secretaries in Practice

M.D. Selvaraj M Com MBA FCS

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Secretarial Compliance Report of M/s. The Lakshmi Mills Company Limited for the year ended 31st March 2020

[Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019]

I, M D Selvaraj (FCS 960 / CP.No.411) of M/s. MDS & Associates, Company Secretaries, have examined:

- all the documents and records made available to us and explanation provided by M/s. The Lakshmi Mills Company Limited (CIN: L17111TZ1910PLC000093) ("the listed entity"),
- the filings/ submissions made by the listed entity to BSE Limited ("the stock exchange"),
- website of the listed entity
- any other document / filing, as may be relevant, which has been relied upon to make this certification

for the year ended 31st March 2020 ("Review Period") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- 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 as applicable to the listed entity, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include: -

- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015
- Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client
- Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018 and other regulations as applicable 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 insofar as it appears from my examination of those records.
- (c) There were no actions taken against the listed entity / its promoters / directors 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.
- (d) The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Observations made in the secretarial compliance report for the year ended 31 st March 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	During the quarter "October 2018 to December 2018", one of the promoter director has purchased 1481 equity shares of Rs.100/- each which has been disclosed by the Company to the Stock Exchange under Regulation 7(2)(b) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 belatedly on 30 th May 2019.	The Company, vide its response letter dated 30 th May 2019, has informed that it has made requisite disclosure to the Stock Exchange in respect of purchase of 1481 equity shares of Rs.100/- each under regulation 7(2)(b) of SEBI (Prohibition of Insider Trading) Regulations, 2015 belatedly on 30 th May 2019.	Nil

- (e) There was no event of appointment/ re-appointment/ resignation of statutory auditor of the Company during the period under review. Further, the Company has modified the terms of appointment of its existing auditor in compliance of the Para (6A) and 6(B) of Circular No. CIR/CFD/CMD1/1 14/2019 dated 18th October, 2019

Place : Coimbatore

Date : 29.07.2020



M D Selvaraj
MDS & Associates
 Company Secretaries
 FCS. No: 960; CP. No: 411
 UDIN: F000960B000523231

