

# SRESTHA FINVEST LIMITED

Date: May 16, 2019

To

1. The Bombay Stock Exchange Limited, Mumbai.
2. The Metropolitan Stock Exchange of India Limited, Mumbai.
- 3.

Dear Sir,

**Sub: Annual Secretarial Compliance Report for the Year ended March 31, 2019**  
**Ref: SEBI Circular No. CIR/CFD/CMD/27/2019 dated February 8, 2019.**

Please find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2019, issued by M/s AXN Prabhu & Associates, Practicing Company Secretaries and Secretarial Auditors of our Company.

We request you to kindly take the same on record.

Thanking you,  
Yours faithfully,  
For Srestha Finvest Limited

*Kamlesh*

**Kamlesh Parasmal**  
**Whole Time Director**  
**DIN: 00810823**  
**Encl. As above**





AXN PRABHU & ASSOCIATES  
COMPANY SECRETARIES

## Secretarial Compliance Report of SresthaFinvest Limited for the year ended March 31, 2019

We, M/sAXN Prabhu & Associates, have examined:

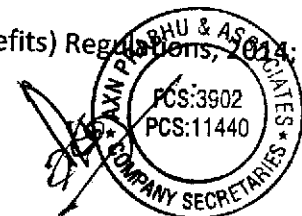
- (a) All the documents and records made available to us and explanation provided by SresthaFinvest Limited ("the Listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (d) any other document/filing, as may be relevant, 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, 2009 (till November 9, 2018);
- (c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) regulations, 2018 w.e.f. November 1, 2018);
- (d) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;



(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;

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

(h) The Securities and Exchange Board of India (Intermediaries) Regulations, 2008;

(i) The Securities and Exchange Board of India (Registration to an issue and share Transfer Agents) Regulations, 1993;

(j) Securities and Exchange Board of India (Debentures Trustee) Regulations, 1993 (in relation to obligations of Issuer Company);

and circulars/guidelines issued thereunder;

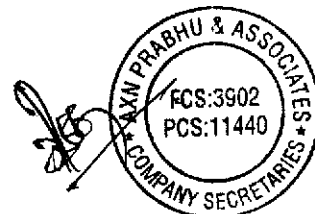
and based on the above examination, We hereby report that, during the review period;

**(a) The Listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued thereunder, except in respect of the matters specified below:-**

<b>Sr. No</b>	<b>Compliance Requirement (Regulations/circulars/guidelines including specified clause)</b>	<b>Deviations</b>	<b>Observations/Remark of the practicing company secretary</b>
<b>1.</b>	<b>Regulation 95 (1) of SEBI (ICDR) Regulations, 2009</b>	<b>Delay of six days</b>	<b>The company had duly remitted the imposed penalty amount and complied with accordingly.</b>

(b) The listed entity has maintained proper record 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 the actions taken against the listed entity/directors/ material subsidiaries either by SEBI or by stock Exchanges (including under the standard operating Procedures issued by SEBI through various circulars)



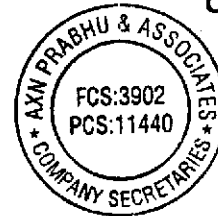
under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

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

(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	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/s AXN Prabhu & Associates  
Company Secretaries



*(Handwritten Signature)*

AXN Prabhu  
Proprietor  
M. No. PCS11440

Place: Chennai  
Date: May 16, 2019