

## Secretarial Compliance Report of Meenakshi Enterprises Limited for the year ended 31<sup>st</sup>

March, 2020

We, Lakshmi Subramanian and Associates, have examined all the documents and records made available to us and explanation provided by Meenakshi Enterprises Limited ("the listed entity"),

- (i) The filings/ submissions made by the listed entity to the stock exchanges,
- (ii) Website of the listed entity,
- (iii) Annual returns filed with the Ministry of Corporate Affairs, which has been relied upon to make this certification, for the year ended 31<sup>st</sup> March, 2020 ("Review Period") in respect of compliance with the provisions of:

- (1) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (2) 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- d. Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- e. Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- f. Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- g. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- h. Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- i. Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- j. Securities and Exchange Board of India (Delisting of Equity Shares) (Amendment) Regulation, 2016



- k. Securities and Exchange Board of India (Investor Protection and Education Fund) Regulations, 2009 Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003
- l. Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018 and circulars/ guidelines issued there under;

Further there are no events reported under (b), (d) to (m) for the year under review. With regard to (a), (c) deviations, wherever applicable, are reported as below.

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 there under, except in respect of matters specified below:-

| S. No. | Compliance Requirement(Regulations/circulars/guidelines including specific clause)         | Deviations   | Observations/Remarks of the Practising Company Secretary  |
|--------|--|--|---|
| 1      | Regulation 6 of SEBI (Listing Obligations and Disclosure Requirements), Regulations, 2015. | The Company has not appointed a qualified company secretary as a compliance officer. | The Company has not appointed a qualified company secretary as a compliance officer from 19 <sup>th</sup> August, 2019 to 19 <sup>th</sup> January, 2020. |

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under in so far 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

| S. No. | Action taken by | Details of Violation  | Details of Action taken, eg., fines, warning letter, debarment, etc. | Observations/Remarks of the Practising Company Secretary, if any |
|--------|-----------------|-----------------------|--|--|
| 1      | BSE Limited     | Non – Compliance with | Fine of Rs. 1,08,560/-   | The Company has made   |





|  |  |   |   |  |
|--|--|---|---|--|
|  |  | Regulation 6 of SEBI (Listing Obligations and Disclosure Requirements), 2015. | (including GST) was levied by the Stock Exchange for Non – Compliance with requirement to appoint a qualified company secretary as a compliance officer for the quarter ended 30 <sup>th</sup> September, 2019. | its representations to Bombay Stock Exchange on 21 <sup>st</sup> November, 2019 stating that According to Section 203 (4) of the Companies Act, 2013 the company has still have a time of Six Months to appoint a qualified company secretary as a compliance officer and also requested the stock exchange to remove the penalty imposed on it. |
|--|--|---|---|--|

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

| S. No. | Observations of the Practising Company Secretary in previous reports | Observations made in the secretarial compliance report for the previous year | Actions taken by the listed entity, if any | Comments of the Practising Company Secretary on the actions taken by the listed entity |
|--------|--|--|--|--|
| NIL    |  |  |  |  |

Name of the Practising Company Secretary :

Swetha Subramanian

Signature:

ACS No. 33222

C.P.No.12512

UDIN: A033222B000319783

Place: Chennai

Date:05-06-2020

