



Ahluwalia Contracts (India) Limited

ENGINEERING ♦ DESIGNING ♦ CONSTRUCTION

Courier/Email/on-line

Date: 28/05/2019

To,

Asst. General Manager
(Corporate Services)

BSE Limited.

25th Floor, P.J.Towers

Dalal Street, Mumbai - 400001

Asst. Vice President - Listing,
National Stock Exchange of India Ltd.

5th Floor, Exchange Plaza,

Bandra Kurla Complex ,

Bandra (East) Mumbai- 400051

Sub.: Annual Secretarial Compliance Report of the Company for the year ended 31 March 2019

Ref.: Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

Dear Sir/Madam,

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMDI /27/2019 dated February 08, 2019 please find attached herewith the "Annual Secretarial Compliance Report" dated 26th May, 2019 issued by Mr. Santosh Kumar Pradhan, Practicing Company Secretary for the year ended 31 March, 2019.

We request you to take note of the above.

Regards,

Yours faithfully,

For Ahluwalia Contracts (India) Ltd

(Vipin Kumar Tiwari)

GM (Corporate) & Company Secretary

Copy to:

To,
The Manager (Listing), Code : 10011134
Calcutta Stock Exchange Ltd ,
7, Lyons Range,
Kolkata – 700001,
Ph.: 033-22104470-4477
Fax : 033-22102223, 4500, 22102210





**Secretarial Compliance Report of Ahluwalia Contracts (India) Limited
(CIN: L45101DL1979PLC009654) for the Year
ended 31st March, 2019**

I, Santosh Kumar Pradhan, Company Secretary in Practice, have examined:

- (a) All the documents and records made available to us and explanation provided by **Ahluwalia Contracts (India) Limited (hereinafter referred to as the Listed Entity)**,
- (b) The filling/ submissions made by the Listed Entity to the Stock Exchanges,
- (c) Website of the Listed Entity,
- (d) Any other document/ filling, 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 of the Provisions of:
 - (a) The Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulation, 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, as amended;
- (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) Regulation, 2018;
- (e) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirement) Regulation, 2018:- **Not applicable during the Review period.**
- (f) Securities and Exchange Board of India (BuyBack of Securities) Regulations, 2018:- **Not applicable during the Review period.**
- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not applicable during the Review period.**



**SANTOSH KUMAR PRADHAN
COMPANY SECRETARIES**

- (g) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014:- **Not applicable during the Review period.**
- (h) Securities and Exchange Board of India (Issued and Listing of Debt Securities Regulation, 2008):- **Not applicable during the Review period.**
- (i) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulation, 2013:- **Not applicable during the Review period.**

and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the review period:

- (a) The Listed Entity has generally 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 though various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder.
- (d) The Listed Entity is not required to take any actions to comply with the observations made in the previous reports, as this is the first secretarial compliance report.
- (e) During the Audit, I observe that the Listed Entity has published its financial results in English Language in Hindi Newspaper. It is suggested to publish the financial results in Hindi in Hindi Newspaper, as Regulation 47(4) of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 requires to publish the financial result in one daily newspaper published in the language of the region, where the registered office of the listed entity is situated.

Place: Ghaziabad
Date: 26.05.2019



**For Santosh Kumar Pradhan
Company Secretaries**



**Santosh Kumar Pradhan
Proprietor
C. P. No. : 7647**