



Date May 31, 2019

To,

**BSE Limited**

**Corporate Relation Department**

**Phiroze Jeejeebhoy Towers**

**Dalal Street**

**Mumbai – 400 001**


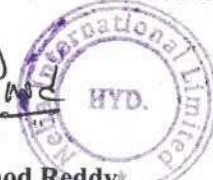
**Scrip Code: 519560**

**Sub: Submission of Secretarial Compliance Report from Practicing Company Secretary under Regulation 24A of the Securities and Exchange Board of India (LODR) Regulations, 2015, for the year ended March 31, 2019.**

As per requirements of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, We are sending herewith a copy of Annual Secretarial Compliance report duly signed by the practicing Company Secretaries for the year ended March 31, 2019.

Please take the above information on record.

**For Neha International Limited**

**G Vinod Reddy**

**Managing Director**

**Neha International Limited**

501, Manbhumi Jade Towers, Rajbhavan Road, Somajiguda, Hyderabad-500 082, India  
CIN: L01122TG1993PLC015987, Tel: +91-40-6613 4759/6636 4543, Fax: +91-40-6613 6435  
[www.nehainternational.com](http://www.nehainternational.com)

We JRA and Associates LLP, Company Secretaries, Hyderabad have examined:

- (a) all the documents and records made available to us and explanation provided by Neha International 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 31<sup>st</sup> March, 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, 2018; (**Not applicable for the reporting period**)
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; (**Not applicable for the reporting period**)
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (**Not applicable for the reporting period**)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (**Not applicable for the reporting period**)
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; (**Not applicable for the reporting period**)
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; (**Not applicable for the reporting period**)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018


and relevant circulars/ guidelines issued thereunder, to the extent applicable;

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 hereunder, 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	Regulation 31 of SEBI Listing Obligations and Disclosure Requirement Regulations, 2015	Delay in Submission of Share holding Pattern for the quarter ended 31 <sup>st</sup> March, 2018 and 30 <sup>th</sup> September, 2018	The share holding pattern for the quarter ended 31 <sup>st</sup> March, 2018 was submitted on 27 <sup>th</sup> April, 2018 as against due date of 21 <sup>st</sup> April, 2018 and for the quarter ended 30 <sup>th</sup> September, 2018 it was submitted on 4 <sup>th</sup> December as against due date of 21 <sup>st</sup> October, 2018.
2	Regulation 33 of SEBI Listing Obligations and Disclosure Requirement Regulations, 2015	Delay in approval of Consolidated Financial Results for the year ended 31 <sup>st</sup> March, 2018	The Consolidated Financial Results for the year ended 31 <sup>st</sup> March, 2018 was approved on 5 <sup>th</sup> December, 2018 and submitted on 10 <sup>th</sup> December, 2018 as against due date of 30 <sup>th</sup> May, 2018.
3	Regulation 13 of SEBI Listing Obligations and Disclosure Requirement Regulations, 2015	Delay in submission of Investor Grievance Report for the quarter ended 31 <sup>st</sup> March, 2018	The Investor Grievance report for the quarter ended 31 <sup>st</sup> March, 2018 was submitted on 27 <sup>th</sup> April, 2018 as against due date of 21 <sup>st</sup> April, 2018.
4	Regulation 19 of SEBI Listing Obligations and Disclosure Requirement Regulations, 2015	Delay in filling up of casual vacancy of Non Executive Director for the Composition of Nomination and Remuneration Committee	The casual vacancy of Non Executive Director was filled on 5 <sup>th</sup> December, 2018 as against the due date of 15 <sup>th</sup> September, 2018.
5	Regulation 76 Securities And Exchange Board Of India (Depositories And Participants) Regulations, 2018	Delay in submission of Reconciliation of Share Capital Audit Report for the quarter ended 30 <sup>th</sup> September, 2018	The Reconciliation of Share Capital Audit Report was submitted on 4 <sup>th</sup> December, 2018 as against due date of 30 <sup>th</sup> October, 2018.

*As per*



- (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 our 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 thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letters, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE	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 report	Observations made in the Secretarial Compliance Report for the year ended 31 <sup>st</sup> March, 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE	NOT APPLICABLE

Place: Hyderabad  
Date: 29-May-2019



For and on behalf of  
JRA and Associates LLP  
Company Secretaries

*Ashok*  
Ashok Kumar Pipalwa  
Designated Partner  
ACS No : 37314  
CP No : 17814