

**DWARAKA PRASAD ASAWA**  
**Company secretary in practice**

#511, Raghava Ratna Towers, Chirag Ali Lane,  
Abids, Hyderabad-500001  
M: 9490506661 ☎ 040-66635759  
Email: [asawavickey@gmail.com](mailto:asawavickey@gmail.com)

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**Secretarial Compliance Report**  
**Of**  
**Pennar Engineered Building Systems Limited for the Year Ended**  
**31<sup>st</sup> March, 2019**

I/We Dwarka Asawa have examined:

- (a) all the documents and records made available to us and explanation provided by **PennarEngineered Building Systems Ltd** ("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**" 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;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) SEBI (Merchant bankers) Regulations, 1992
- (e) SEBI (Intermediaries) Regulations, 2008
- (f) SEBI (Prohibition of Fraudulent and unfair trade practices relating to Securities market) Regulations, 2003





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(g) SEBI (Know your client) Registration Agency} Regulations, 2011

and based on the above examination, I/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:-

Sr.no	Compliance requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/ Remarks of the practicing company secretary

- b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far as it appears from my/our examination of those records.

- c) The following are the details of action 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	Observations/ remarks of the Practicing Company Secretary, if any

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

sr.no	Observations of the Practicing company Secretary in the	Observations made in the Secretarial compliance report for the year ended 2019	Action taken By the listed Entity, if any	Comments of the practicing Company Secretary on





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	previous reports			the actions taken by the listed Entity

Place: Hyderabad

Date: 24.05.2019



Dwarka Prasad Asawa

Practicing Company Secretary

Membership No: 20636

CP NO: 7546