



CIN: L45200MH1992PLC069044

Date : 29th May, 2024

To,
Department of Corporate Services
BSE Limited
Floor 25, Phiroze Jeejeebhoy Tower,
Dalal Street, Mumbai – 400 001

Re. : Scrip Code : 526727

Sub : Annual Secretarial Compliance Report for the F. Y. 2023-2024

Dear Sir/ Madam, Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, read with SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed the Annual Secretarial Compliance Report of the Company issued by M/s. Namrata Vyas & Associates, Practicing Company Secretaries for the financial year 2023-2024

Kindly take the same on your record.

Thanking You,
Yours truly,
For Garnet Construction Limited

A handwritten signature in blue ink, appearing to read "Kishan Kumar Kedia", is written over a faint, light blue horizontal line.

Kishan Kumar Kedia
Managing Director

Encl : As above

Garnet Construction Limited

Registered & Corporate Office:

501/531, Laxmi Mall, Laxmi Industrial Estate, New Link Road, Andheri (W), Mumbai - 400 053.
Tel: 91-22-42578500 | Fax: 91-22-42578522 | E-mail: garnet@garnetconstructions.com | www.garnetconstructions.com

NEETU MAHESHWARI

PRACTISING COMPANY SECRETARY

Office : 316, MANGLAM, ELECTRONIC MARKET, RIDHI SIDHI CHORAHA, JAIPUR, RAJASTHAN
302015 CONT. 7976364437, 9530158082 Email: csmaheshwari2@gmail.com

To,

The Members

Garnet Construction Limited

CIN:L45200MH1992PLC069044

501/531, Laxmi Mall, Laxmi Industrial Estate, New Link Road,
Andheri West, Mumbai-400053

Sir/Madam,

Annual Secretarial Compliance Report for the Financial Year 2023-24

I have been engaged by Garnet Construction Limited having CIN L45200MH1992PLC069044 whose equity shares are listed on BSE Limited (Security Code: 526727, ISIN: INE797D01017), to conduct an audit in terms of Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended, read with SEBI's Circular No: CIR/CFD/CMD1/27/2019 dated 8th February, 2019 and to issue the Annual Secretarial Compliance Report thereon.

It is the responsibility of the management of the Company to maintain records, devise proper systems to ensure compliance with provisions of all applicable SEBI Regulations, relevant circulars /guidelines issued thereunder from time to time and to ensure that the systems are adequate and are operating effectively.


Our responsibility is to verify compliances by the Company with provisions of all applicable SEBI Regulations, relevant circulars/ guidelines issued there under from time to time and issue a report thereon.

We have conducted our Audit based on the records and information made available to us and in accordance with ICSI Guidance Note on Annual Secretarial Compliance Report and in a manner which involved such examinations and verifications as considered necessary and adequate for the said purpose.

Annual Secretarial Compliance Report is enclosed.

For
NEETU MAHESHWARI
Practicing Company Secretaries

NEETU
MAHESHWARI



Digitally signed by
NEETU MAHESHWARI
Date: 2024.05.28
14:46:11 +05'30'

CP No. 13397
Membership No. F10266
UDIN: F010266F000469857
Place: Mumbai
Date: 28.05.2024

SECRETARIAL COMPLIANCE REPORT
For the year ended March 31st 2024
Garnet Construction Limited
CIN:L45200MH1992PLC069044

I, NEETU MAHESHWARI, Practicing Company Secretaries, having office at 316, MANGLAM MALL, RIDHI SIDDHI CHORAHA, JAIPUR, RAJ, 302018, India have examined:

- (a) all the documents and records made available to us and explanation provided by the GARNET CONSTRUCTIONS LTD. (“the listed entity”);
- (b) the filings/submissions made by the listed entity to the stock exchange.
- (c) Web site 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, 2024 (“**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 there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India (“**SEBI**”);

The specific Regulations applicable to the Company, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015; and amendment thereof (“**Listing Regulations**”);
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; and amendment thereof
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011; and amendment thereof
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (Not applicable to the company during reporting period)
- (e) securities and Exchange Board of India (Share Based Employee Benefits)

Regulations, 2014; (Not applicable to the company during reporting period)

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(Not applicable to the company during reporting period)

(g) Securities and Exchange Board of India (Issue and Listing of Non- convertible and Redeemable Preference Shares) Regulations, 2013(Not applicable to the company during 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 circulars/ guidelines issued thereunder;

(j) Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2009; **(Not Applicable to the Company during reporting period)**

(k) Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;

(l) Other regulations as applicable and circulars/guidelines issued thereunder;

and based on the above examination; I hereby report that, during the Review Period:

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

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
										None

None

- 1) (b) The listed entity has taken the following actions to comply with the observations made in previous

Sr. No.	Compliance Requirement (Regulations / circulars/ guidelines including specific clause)	Regulation/ Circular No	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary (PCS)	Management Response	Remarks
										None

- 1) (c) The listed entity has suitably included the conditions as mentioned in para 6(A) and 6(8) of the SEBI Circular CIR/CFD/CMDI/114/2019 dated October 18, 2019 in terms of re-appointment of statutory auditor of the listed entity.

Based on my examination and verification of the documents and records produced to us and according to the information and explanations given to us by the Company, I hereby also report that:

Sr. No.	Particulars	Compliance status (Yes/No/NA)	Observations /Remark by PCS*
1.	Secretarial Standards. The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India {ICSI}.	Yes	NA

2.	<p>Adoption and timely updation of the Policies:</p> <p>a) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities.</p> <p>b) All the policies are in conformity with SEBI Regulations and has been reviewed & timely</p> <ul style="list-style-type: none"> • updated as per the regulations/circulars/issued by SEBI 	Yes	NA
3.	<p>Maintenance and disclosures on Website.</p> <p>a) The Listed entity is maintaining a functional website.</p> <p>b) Timely dissemination of the documents/ information under a separate section on the website.</p> <p>c) Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website</p>	Yes	NA
4.	<p>Disqualification of Director.</p> <p>None of the Directors of the Company is disqualified under Section 164 of Companies Act, 2013.</p>	Yes	NA
5.	<p>To examine details related to Subsidiaries of listed entities.</p> <p>(a) Identification of material subsidiary companies.</p> <p>(b) Requirements with respect to disclosure of material as well as other subsidiaries.</p>	NA	NA
6.	<p>Preservation of Documents.</p> <p>The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations,2015</p>	Yes	NA

7.	Performance Evaluation. The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations/ Listing Regulations.	Yes	NA
8.	Related Party Transactions. a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions. b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ ratified/rejected by the Audit committee~	Yes	NA
9.	Disclosure of events or information. The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule Ill of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	Yes	NA
10.	Prohibition of Insider Trading. The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	NA
11.	Actions taken by SEBI or Stock Exchange(s), if any: No Actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars/ guidelines issued thereunder.	NA	NA

12.	Additional Non-compliances, if any: No any additional non-compliance observed for all SEBI regulation/circular/guidance note etc.	NA	NA
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For
NEETU MAHESHWARI
Practicing Company Secretaries

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MAHESHWARI

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