



JAI BALAJI INDUSTRIES LIMITED

Ref. : JBIL/SE/2019-20
Date: 28th May, 2019

To
The Manager
Listing Department,
National Stock Exchange of India Limited
"EXCHANGE PLAZA", C-1, Block G
Bandra - Kurla Complex, Bandra (E)
Mumbai – 400 051
(Company's Scrip Code: JAIBALAJI)

To
The Manager,
Dept. of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400 001
(Company's Scrip Code: 532976)

Dear Sir,

Sub: Submission of Annual Secretarial Compliance Report for the year ended March 31, 2019

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended March 31, 2019 issued by M/s MKB & Associates, Practicing Company Secretaries.

This is for your kind information and record.

Thanking you.

Yours faithfully,
for **JAI BALAJI INDUSTRIES LIMITED**

AJAY KUMAR TANTIA
Company Secretary

Regd. Office : 5, Bentinck Street, 1st Floor, Kokata- 700 001.

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CIN - L27102WB1999PLC089755



SECRETARIAL COMPLIANCE REPORT OF JAI BALAJI INDUSTRIES LIMITED
FOR THE YEAR ENDED 31.03.2019

I, Manoj Kumar Banthia, Partner, MKB & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **Jai Balaji Industries 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 31st 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, to the extent applicable, 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) Securities and Exchange Board of India (Buyback of Securities) Regulations,2018;
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations,2014;
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations,2008;
- (g) Securities and Exchange Board of India(Issue and Listing of Non- Convertible and Redeemable Preference Shares)Regulations,2013;
- Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations,2015;

and circulars/ guidelines issued thereunder;

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 thereunder, except in respect of matter specified below:

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary





1.	Regulation 33(3)(d) of Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Board of Directors of the Company have approved the audited financial results for financial year 2017-18 on 30 th June, 2018 which were supposed to be approved and submitted to stock exchanges within sixty days from the end of the Financial Year i.e. by 30 th May, 2018	The National Stock Exchange of India Limited (NSE) and BSE Limited have imposed a fine on the Company for the days of non-compliance and the same has been paid on 17 th April, 2019 and 21 st September, 2018 respectively.
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- (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/our examination of those records.
- (c) The following are the actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges¹ (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 letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1.	National Stock Exchange of India Limited (NSE)	The Board of Directors of the Company have approved the audited financial results for financial year 2017-18 on 30 th June, 2018 which were supposed to be approved and submitted to stock exchanges within sixty days from the end of the Financial Year i.e. by 30 th May, 2018 thus violating Regulation 33(3)(d) of Exchange Board of India (Listing Obligations and	Fine was imposed by National Stock Exchange of India Limited on the Company	The Company has paid the fine on 17 th April, 2019.





		Disclosure Requirements) Regulations,2015		
2.	BSE Limited	The Board of Directors of the Company have approved the audited financial results for financial year 2017-18 on 30 th June, 2018 which were supposed to be approved and submitted to stock exchanges within sixty days from the end of the Financial Year i.e. by 30 th May, 2018 thus violating Regulation 33(3)(d) of Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations,2015	Fine was imposed by BSE Limited on the Company	The Company has paid the fine on 21 st September, 2018.

- (d) Being the first year of Secretarial Compliance Report, there are no comments on the observations made in the secretarial compliance report of previous years.

Date: 28.05.2019
Place: Kolkata

For **MKB & Associates**
Company Secretaries


Manoj Kumar Banthia
[Partner]

ACS no. 11470

COP no. 7596

FRN: P2010WB042700