

*M. Maheshwari & Associates*  
*Company Secretaries*

Manish Maheshwari  
M.Com, LL.B., F.C.S.

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**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SIGNET INDUSTRIES LIMITED FOR  
THE YEAR ENDED MARCH 31, 2020**

To  
The Board of Directors  
**SIGNET INDUSTRIES LIMITED**  
CIN: L51900MH1985PLC035202  
1003, MEADOWS BUILDING, SAHAR PLAZA  
COMPLEX J.B. NAGAR, ANDHERI (EAST)  
MUMBAI 400059

Sir/Madam

We, M/s. M. Maheshwari & Associates, Company Secretaries, have examined:

- (a) All the documents and records made available to us and explanation provided by **M/s Signet Industries Limited** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity [www.groupsignet.com](http://www.groupsignet.com).
- (d) Any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31, 2020 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 there under; 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, whose provisions and the circulars/ guidelines issued there under, have been examined, include:-

- a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 to the extent applicable.



- b) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- c) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

The company, during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minute books or other records or file any forms / returns under:

- a) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- b) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- d) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

and circulars/ guidelines issued thereunder;

And based on the above examination, we hereby report that, during the Review Period, following are the details:

- 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)	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 insofar as it appears from my 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 there under:





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

- 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 reports	Observations made in the secretarial compliance report for the year ended 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Mr. Mukesh Sangla, rectified the wrongful purchase by selling those 114 shares in the open market immediately on next early trading day i.e on 23.01.2019.	Mr. Mukesh Sangla, rectified the wrongful purchase by selling those 114 shares in the open market immediately on next early trading day i.e on 23.01.2019.	The wrongful purchase was rectified by selling those 114 shares in the open market immediately on next early trading day i.e on 23.01.2019.	The non-compliance occurred is not a willful omission. The Promoter reversed the transaction and informed to Stock Exchanges.

\*The report is subject to the information made available by the Company during the restrictions applied due to 'COVID-19'.

For M. Maheshwari & Associates  
Company Secretaries  
Firms U.C.N. I2001MP213000



*Manish Maheshwari*

Manish Maheshwari  
Proprietor  
FCS-5174  
CP-3860

Date : 29<sup>th</sup> July 2020

Place : Indore

UDIN : F005174B000524429