



# Gromo Trade & Consultancy Limited

(Formerly Kamalakshi Finance Corporation Limited)

CIN: L67120MH1973PLC016243

Date: 29/05/2019

To,  
The Bombay Stock Exchange Ltd  
Corporate Relationship Dept,  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building, P. J. Towers,  
Dalal Street, Fort, Mumbai – 400 001

**BSE Scrip Code: 501314**

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

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed 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.

Thanking You

Yours Faithfully

**For Gromo Trade & Consultancy Limited**

**Tejas Hingu**  
**(Managing Director)**

Encl: a/a



**Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March 2019**

To,  
**GROMO TRADE AND CONSULTANCY LIMITED,**  
Unit No. 506, Link Plaza, Off New Link Road,  
Andheri (west), Mumbai-400053.

We, P.D.Pandya & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **GROMO TRADE AND CONSULTANCY 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 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;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; *(Not Applicable to the Company for the period under review)*
- (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; *(Not Applicable to the Company for the period under review)*
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; *(Not applicable to the Company for the period under review)*



- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; *(Not applicable to the Company for the period under review)*
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; *(Not applicable to the Company for the period under review)*
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there under, **except** in respect of matters specified below: **-No deviations observed**

| Sr No | Compliance Requirements<br>(Regulations/Circulars/Guidelines including specific clauses) | Deviations | Observations/Remarks |
|-------|------------------------------------------------------------------------------------------|------------|----------------------|
|       | .....                                                                                    |            |                      |
|       |                                                                                          |            |                      |

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued there under insofar as it appears from my/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 there under :

| Sr No | Action taken by                      | Details of Violation                 | Details of Action taken                                                                                                                                                                                                                              | Comments on the Actions taken by the Company |
|-------|--------------------------------------|--------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|
| 1     | SEBI by final order dated 30/10/2018 | Violation under Reg 3 and 4 of PFUTP | 1) Not to access securities market and prohibited from buying, selling or otherwise dealing in securities for 5 years from date of interim order dated 20/02/2015<br>2) Revocation of Suspension of shares of the company from Bombay Stock Exchange | NA                                           |



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

| <i>Sr No</i>          | <i>Observations in the previous Reports</i> | <i>Observations made in the Secretarial Compliance Report</i> | <i>Actions taken by the Listed Entity; if any</i> | <i>Comments on the Actions taken by the Company</i> |
|-----------------------|---------------------------------------------|---------------------------------------------------------------|---------------------------------------------------|-----------------------------------------------------|
| <b>Not Applicable</b> |                                             |                                                               |                                                   |                                                     |

For Paresh D Pandya & Associates  
Practicing Company Secretary



(Paresh Pandya)  
Proprietor  
ACS No. 12123  
CP No.: 4869

Place: Mumbai  
Date: 29/05/2019