

30th May, 2019

To,
BSE Ltd.,
Corporate Relation Department,
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 023.
Facsimile No. 22723121/22722037/2041
Scrip Code 512493

Dear Sir/Madam,

Sub: Annual Secretarial Compliance Report pursuant to Regulation 24A of Listing Obligations and Disclosure Requirements) Regulations, 2015

Ref: SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019

Pursuant to SEBI Circular No. CIR/CFD/CMDI/27/2019 dated February 8, 2019 and in Compliance with Regulation 24A of Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed Annual Secretarial Compliance Report of Garnet International Limited for the year ended 31st March, 2019, issued by M/s. Vaibhavi S.Shah, Practicing Company Secretary.

For Garnet International Limited



Deepika Pandey
Company Secretary
ACS: 41277





**SECRETARIAL COMPLIANCE REPORT OF GARNET INTERNATIONAL
LIMITED FOR THE YEAR ENDED 31ST MARCH, 2019**

I, Vaibhavi Smit Shah Practicing Company Secretary have examined:

- (a) all the documents and records made available to me and explanation provided by Garnet International 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 ("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 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:-

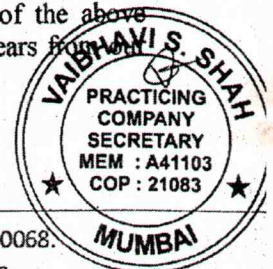
- (a) Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and
- (e) Circulars/ guidelines issued thereunder.

Based on the above examination, I 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 the matter specified below:-

Sr. No.	Compliance Requirement (Regulations/circulars/guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
	None		

- (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 on sample basis.





- (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 thereunder:

Sr. No.	Action taken by	Details of Violation	Details of Action taken	Observations/ remarks
1	BSE Ltd.	Regulation 17(1) of SEBI (LODR) Regulations, 2015.	Fine of INR 100,300/- including GST of INR 15,300/-	The Company was not able to appoint women Director but with effect from 11/01/2019 the Company has appointed women Director and complied with the regulation 17(1).

- (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 report	Observations made in the secretarial compliance report for the year end (The years are to be mentioned)	Actions taken by listed entity, if any.	Comments of Practicing Company Secretary on the actions taken by Listed Entity.
	Not applicable considering it is the first year of implementation of this report.			

Note:

- * As per the website of Calcutta Stock Exchange Limited (CSE) Database (<https://www.cse-india.com/listi/database>), Garnet International Limited ('Company') is listed on CSE and showing the company status as suspended. However, based on the representation of the management, the company has received members approval for delisting from CSE on September 23, 2003 and also made delisting application to delist from CSE and for the same the company has not received any communication from CSE and based on the representation received the company is not doing any filing/submission with CSE.

Date: 30th May, 2019
Place: Mumbai



Shah
Vaibhavi Smit Shah
Practicing Company Secretary
ACS No.: 41103
COP No.: 21083