

Subhash Silk Mills Ltd.

Regd. Office :G-15, Ground Floor, Prem Kutir, 177 Marine Drive, Mumbai 400020

Admin Office : 89, Gautam Complex, Sector 11, CBD Belapur, Navi Mumbai 400614

CIN : L17106MH1970PLC014868

(T) 022-40619000 (F) 022-22825309 (E) admin@subhashsilk Mills.com (W) www.subhashsilk Mills.com

To,

May 29, 2019

Listing Department,

BSE Limited,

Stock Exchange Building,

2nd Floor, Dalal Street,

Fort, Mumbai 400023

Security Code: 530231

Reference: SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

Subject: Submission of Annual Secretarial Compliance report for the year ended March 31, 2019.

Respected Sir/Madam,

Kindly find enclosed herewith the Annual Secretarial Compliance Report for the year ended March 31, 2019, issued by KNK & Co. LLP, Company Secretaries in Practice.

Kindly take the above on record.

Thanking You,

Yours faithfully

Yours faithfully,

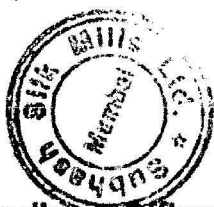
For Subhash Silk Mills Ltd.,



Paridhi Somani

Company Secretary & Compliance Officer

Mem. No.: A45165



Encl.: As stated above.

**ANNUAL SECRETARIAL COMPLIANCE REPORT OF SUBHASH SILK MILLS LIMITED
FOR THE YEAR ENDED MARCH 31, 2019**

To

Subhash Silk Mills Ltd.,

G-15, Ground Floor, Prem Kutir,

177 Marine Drive, Mumbai 400020

We, **KNK & Co LLP**, firm of Company Secretaries in Practice, having firm registration number **L2017MH002800** (hereinafter referred to as 'FRN'), have examined:

- (a) all the documents and records available to us and explanation provided by **Subhash Silk Mills Limited** (hereinafter referred to as '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 **March 31, 2019** (hereinafter referred to as 'the 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 (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;
- (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;

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, to the extent applicable.
- (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 our examination of those records.
- (c) No actions were 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.



- (d) This being the first report since the notification to submit the report, reporting on actions to comply with the observations made in the previous reports is not applicable for the review period.

For **KNK & Co. LLP**

Company Secretaries

FRN: L2017MH002800



Jyoti N. Kholia
Partner

Place : Mumbai

Date : May 20, 2019

FCS No. : F9803 | CP No.: 12224