



**Secretarial compliance report of  
ABHISHEK CORPORATION LIMITED  
for the year ended 31<sup>st</sup> March 2019**

We have examined:

- (a) all the documents and records made available to us and explanation provided by **ABHISHEK CORPORATION LIMITED (CIN L51491PN1993PLC073706)** ("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:

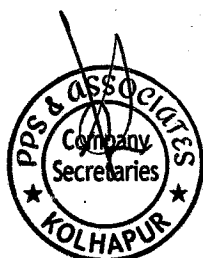
- (a) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities 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 during the Review period);**
- (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 during the Review period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 **(Not Applicable to the Company during the Review period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 **(Not Applicable to the Company during the Review period);**
- (g) Securities and Exchange Board of India (Issue and Listing of Non- Convertible and Redeemable Preference Shares) Regulations, 2013 **(Not Applicable to the Company during the Review period);**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) other regulations as applicable) 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 matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	<p><b>Reg 33(3)(d)</b></p> <p>The listed entity shall submit annual audited standalone financial results for the financial year, within sixty days from the end of the financial year along with the audit report.</p>	<p>Quarterly and year to date audited financial result for the quarter ended March 31, 2018 was required to be filed by May 30, 2018. However Company filed the audited financial result for the quarter ended March 31, 2018 to</p> <p>BSE – on 3rd September 2018 ( Delay of 96 Days)</p> <p>AND TO</p> <p>NSE – on 7th September 2018 (Delay of 100 Days)</p>	<p>BSE has imposed Fine of Rs. 6,37,294.40 however Company has not paid fine since it is under Corporate Insolvency Resolution Process.</p>
2.	<p><b>Reg 33(3)(a)</b></p> <p>The listed entity shall submit quarterly and year-to-date standalone financial results to the stock exchange within forty-five days of end of each quarter, other than the last quarter.</p>	<p>Quarterly unaudited financial result for the quarter ended June 30, 2018 was required to be filed by August 14, 2018. However Company filed the unaudited financial result for the quarter ended September 30, 2018 to BSE AND NSE on 29th September 2018 with delay of 46 Days</p>	<p>BSE has imposed Fine of Rs. 5,31,000/- however Company has not paid fine since it is under Corporate Insolvency Resolution Process.</p>
3.	<p><b>Reg 30(6)</b></p> <p>The listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information.</p> <p>Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation</p>	<p>Order of liquidation passed by NCLT ,Mumbai bench dated 11 March,2019 is filed with the stock exchanges on 14.05.2019. Further Company has not disclosed to the stock exchange several events specified in point no. 16 Part A of Schedule III to the SEBI ( LODR) 2015) with reference to Corporate Insolvency Resolution Process</p>	<p>N.A.</p>



	<p>for delay:</p> <p>Provided further that disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.</p>		
4.	<p><b>Reg 33(6)</b></p> <p>The listed entity shall first disclose to stock exchange(s) of all events, as specified in Part A of Schedule III, or information as soon as reasonably possible and not later than twenty four hours from the occurrence of event or information.</p> <p>Provided that in case the disclosure is made after twenty four hours of occurrence of the event or information, the listed entity shall, along with such disclosures provide explanation for delay:</p> <p>Provided further that disclosure with respect to events specified in sub-para 4 of Para A of Part A of Schedule III shall be made within thirty minutes of the conclusion of the board meeting.</p>	<p>Financial Result for the quarter and year ended on March 31, 2018 which was approved in Board of Directors Meeting held on 03.09.2018 was filed with NSE on 07.09.2018 with delay of 4 days.</p>	N.A.
5.	<p><b>Reg 14</b></p> <p>The listed entity shall pay all such fees or charges, as applicable, to the recognized stock exchange(s), in the manner specified.</p>	<p>Company has not paid listing fees for the year 2018-19</p>	<p>BSE has suspended trading due to nonpayment of Annual Listing Fees.</p>

(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 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 E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
1	BSE Limited	Non Submission of Financial Result for the quarter ended on June 30, 2018 within period prescribed under regulation 33	Fine of Rs. 1,77,000 was imposed	Company has not paid fine since it is under Corporate Insolvency Resolution Process
2	BSE Limited	Non Submission of Financial Result for the quarter ended on March 31, 2018 within period prescribed under regulation 33	Fine of Rs. 2,83,294.40 was imposed	Company has not paid fine since it is under Corporate Insolvency Resolution Process
3	BSE Limited	Non Submission of Financial Result for the quarter ended on March 31, 2018 and June 30, 2018 within period prescribed under regulation 33	Fine of Rs. 6,37,294.40 was imposed for the quarter ended on March 2018 and Rs. 5,31,000/- for the quarter ended on June 2018	Company has not paid fine since it is under Corporate Insolvency Resolution Process

(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... (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
This being first report under Regulation 24A this part is <b>NOT APPLICABLE</b>				

Place: Kolhapur  
Date: May 30, 2019

For, PPS & Associates  
Company Secretaries

Shrenik Nagaonkar  
Partner  
FCS No.: 7067 C P No.: 11682

