

Date – 18/06/2021

To, BSE Ltd. Department of Corporate Services Corporate Relation Department 14 th Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400001	To, National Stock Exchange of India Ltd Exchange Plaza, 5 th Floor, G Block Bandra Kurla Complex, Bandra (E) Mumbai - 400051
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Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2021

BSE: Scrip Code: 539407


NSE Symbol: GENCON

Dear Sir/Madam(s),

Kindly find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2021 issued by Mr Aditya Kelkar, Practicing Company Secretary, pursuant to SEBI Circular CIR/CFD/CMD1/27/2019 dated February 8, 2019 read with Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Request you to kindly take the above information on your record and acknowledge the same.

For M/S Generic Engineering Construction and Projects Limited


Ami Shah
Company Secretary
Date – 18/06/2021
Place - Mumbai



Aditya S. Kelkar
B. Com., LL. B., ACS

ADITYA KELKAR & ASSOCIATES
COMPANY SECRETARIES

Office : "Vihanga Apts.," Ground Floor, Sonumai Joshi Path, Erandwane, Pune - 411 004.
E-mail : adityaskcs@askcs.in Web : www.csadityakelkarassociates.com / www.askcs.in

Ref. :

Date :

SECRETARIAL COMPLIANCE REPORT

**REGULATION 24A OF SEBI (LISTING OBLIGATIONS AND DISCLOSURE
REQUIREMENTS) REGULATIONS, 2015**

For, **GENERIC ENGINEERING CONSTRUCTION AND PROJECTS LIMITED, CIN :
L45100MH1994PLC082540, for the year ended 31st March, 2021.**

I, **CS Aditya Kelkar, Proprietor of M/s. Aditya Kelkar & Associates, Company Secretaries,**
have examined:

- (a) A the documents and records made available to us and explanation provided by
GENERIC ENGINEERING CONSTRUCTION AND PROJECTS 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/ filings, as may be relevant, which has been relied upon to make
this certification,

for the year ended 31st March, 2021 ("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")





Ref. :

Date :

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 (**not applicable to the Listed Entity during Review Period**);
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 (**not applicable to the Listed Entity during Review Period**);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (**not applicable to the Listed Entity during 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 Listed Entity during Review Period**);





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(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and circulars/ guidelines issued thereunder;

and based on the above examination, I hereby report that, during the Review Period:

(a) The listed entity has complied with the provisions of above Regulations and circulars/guidelines issued thereunder:

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder in so far 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 circular/ guidelines issued thereunder:

Sr. No.	Action Taken by	Details of Violation	Details of action taken e.g. fines, warning letters, debarment etc.	Observations/ remarks of the Practicing Company Secretary, if any
NIL				





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(a) The Listed Entity has taken following actions to comply with observations made in previous reports:

Sr. No.	Observations/ remarks of the Practicing Company Secretary, in previous reports	Observations made in the Secretarial Compliance Report for the year ended 31 st March, 2020	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				


Memb. No.: 28367
PCS No.: 10151

Aditya Kelkar

For

Aditya Kelkar & Associates

PRACTICING COMPANY SECRETARY

M.No.28367.

UDIN : A028367C000482942

Place: Pune.

Date: 18th June, 2021