

Date – 16/06/2020

To,
BSE Ltd,
Department of Corporate Services
Corporate Relation Department
14th Floor, Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400001

Sub: Submission of Annual Secretarial Compliance Report for the financial year ended March 31, 2020

BSE: Scrip Code: 539407

Dear Sir/Madam(s),

Kindly find enclosed herewith the Annual Secretarial Compliance Report for the Financial Year ended March 31, 2020 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.

Further due to COVID – 19 pandemic and restrictions imposed by the State and the Central Government, we are working from home and have limited infrastructure and hence we are unable to submit the signed documents to the Stock Exchange.

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

For M/S Generic Engineering Construction and Projects Limited

SD/-
Ami Shah
Company Secretary
Date – 16/06/2020
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

of **GENERIC ENGINEERING CONSTRUCTION AND PROJECTS LIMITED, CIN : L45100MH1994PLC082540, for the year ended 31st March, 2020**

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, 2020 ("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")





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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, 2019	Actions taken by the Listed Entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NIL				



Aditya Kelkar

For

Aditya Kelkar & Associates

PRACTICING COMPANY SECRETARY

M.No.28367.

UDIN: A028367B000343165

Place: Pune.

Date: 15th June, 2020