



K. RAHUL & ASSOCIATES

Company Secretaries

**SECRETARIAL COMPLIANCE REPORT OF JMT AUTO LIMITED FOR THE YEAR ENDED
31ST MARCH, 2019**

I, Rahul Kumar, Practicing Company Secretary have examined:

- a) all the documents and records made available to us and explanation provided by M/s JMT AUTO 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 (Buyback of Securities) Regulations, 2018; **Not Applicable as the Company has not bought back any of its securities during the financial year under review.**
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as the Company has not granted any options to its employees during the financial year under review**
- 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; **Not Applicable**





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- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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 there under, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/Circulars/ guideline including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1.	Regulation 13 (3) -Investor Complaint for Quarter ended 31 st March, 2019	Delayed Submission	The Statement of Investor complaints were submitted on April 23 rd , 2019 with a delay of 2 (Two) days.
2.	Regulation 33(3)(a)-Financial Result for Quarter ended 31 st December, 2018	Delayed Submission	The Un-audited financial result were submitted on February 25, 2019 with a delay of 10 (Ten) days.
3.	Regulation 13 (3) -Investor Complaint for Quarter ended 30 th September, 2018	Delayed Submission	The Statement of Investor complaints were submitted on October 24 th , 2018 with a delay of 3 (Three) days.
4.	Regulation 13 (3) -Investor Complaint for Quarter ended 30 th June, 2018	Delayed Submission	The Statement of Investor complaints were submitted on July 26 th , 2018 with a delay of 5 (Five) days.

(b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar 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 circulars/ guidelines issued there under:





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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.	Stock Exchange	Regulation 33(3)(a)- Financial Result for Quarter ended 31 st December, 2018	Penalty paid	The Penalty has been paid by the Company For late submission of Financial Result For the Qtr Ended 31 st December,2018

(d) The listed entity has taken the following actions to comply with the observations made in previous reports: **Not Applicable**, since this report is being issued for the first time and accordingly no action was required to be taken by the Company.

For K. Rahul & Associates
Company Secretaries

Rahul Kumar
Membership No.:13975
CP No.: 17874
Date: 28/05/2019
Place: New Delhi

