

**SECRETARIAL COMPLIANCE REPORT OF M/S. REDEX PROTECH LIMITED FOR THE
YEAR ENDED 31ST MARCH, 2019**

We, **M/s. A. SHAH & ASSOCIATES, Practicing Company Secretaries** have examined:

- (a) all the documents and records made available to us and explanation provided by **M/s. Redex Protech 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;
- (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;

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(i) Securities and Exchange Board of India (Depository Participant) 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, 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	Reg- 31(2) of SEBI(LODR) Regulations, 2015	100% (Hundred percent) shareholding of promoter and promoter group is not held in Dematerialized Form.	The Company has taken steps to ensure that the physical shares held by promoter or promoter group are fully converted into DEMAT. However, still two shareholders of promoter group are holding shares in physical.
2	Reg- 6(2) of SEBI(LODR) , 2015 for June, 2018 & September, 2018	Non appointment Company Secretary as a Compliance Officer	The Company has not complied with the regulation of appointment of Company Secretary for the quarter of June , 2018 and September, 2018. However, the company has complied with the said regulation by appointing a Whole Time Company Secretary as a Compliance officer of the Company w.e.f 15 th December, 2018
3	Regulation - 76 of SEBI (Depository Participants) Regulations, 2018	Delay in confirmation of request received from shareholders for Dematerialization	The Delay in confirmation of application received for Dematerialization of shares was due to technical issues.
4	Reg- 40(9) of SEBI(LODR) Regulations, 2015 for the half year ended on 31-03-2019	Delay in issue of share certificates for the application lodged for transfer	The delay in issue of share certificate received for transfer was due to technical issues.

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(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.
NIL	NIL	NIL	NIL	NIL

(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
NA	NA	NA	NA	NA

#This being the first year for Annual Secretarial Compliance Report, the observation and remarks from previous report will not be applicable.

**PLACE: AHMEDABAD
DATE: 27/05/2019**

**FOR, M/S. A. SHAH & ASSOCIATES
PRACTICING COMPANY SECRETARIES**

**MR. ANISH B. SHAH
PROPRIETOR
FCS NO.: 4713
C P NO.:6560**