



July 28, 2020

Corporate Service Department BSE LIMITED	The Listing Department National Stock Exchange of India Limited
25 th Floor, PhirozeJeejeebhoy Towers Dalal Street Mumbai – 400001 BSE Code: 533189	Exchange Plaza, Plot No. C/1, G Block, BandraKurla Complex, Bandra (E), Mumbai – 400051 NSE Code: GOENKA

Sub: Annual Secretarial Compliance report

Dear Sirs,

Kindly find enclosed herewith Annual Secretarial Compliance Report for the year ended March 31, 2020

Kindly take the same on record.

Thanking you

Yours faithfully,

For GOENKA DIAMOND & JEWELS LIMITED

Navneet Goenka
DIN : 00164428
Managing Director





VISHAL N. MANSETA (B.Com, A. C. S.)

Practicing Company Secretary

Off. No. 12, B Wing, Smital Avenue, Hatkesh Udyog Nagar Road, Near JP North,
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Secretarial compliance report of GOENKA DIAMOND AND JEWELS LIMITED for the year ended March 31, 2020

I have examined:

- a) all the documents and records made available to us and explanation provided by **Goenka Diamond and Jewels 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,

I have conducted audit of the **Goenka Diamond and Jewels Limited** for the year ended March 31, 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");

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;
 - 1) Appointment of company secretary was intimated after 30 days;
 - 2) Intimation of outcome of Board meeting after 30 minutes;
- (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;

and based on the above examination, I/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
NIL			

- (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.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended March 31, 2020	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	Appointment of company secretary was intimated after 30 days	Appointment was ratified in Board meeting and then informed to the exchanges	Intimated to exchanges	Penalty was paid
2	Intimation of outcome of Board meeting after 30 minutes	Due to technical error. The outcome was submitted on the same day delay was of approximately half an hour.	Intimated to exchanges	Penalty was paid

Place:
Date:

UDIN : A025183B000517961



For Vishal N. Manseta
(Practicing Company Secretary)


Vishal N. Manseta
M. No : 25183
C.P. No: 8981