

CIN: L65910PB1981PLC023058  
GSTIN: 03AAACK4419L1ZO  
PAN: AAACK4419L  
Email: kovalam@owmnahar.com

## **KOVALAM INVESTMENT AND TRADING COMPANY LIMITED**

REGD. OFFICE: PREMISES OSWAL WOOLLEN MILLS LTD, G.T. ROAD, SHERPUR, LUDHIANA-141003

May 28 2019

Department of Corporate Relations,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400001

**Scrip Code: 505585**

Dear Sir / Madam,

**Sub.: Annual Secretarial Compliance Report for the financial year ended March 31, 2019**

With reference to the SEBI circular CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of the Company for the financial year ended March 31, 2019, issued by M/s P.S. Dua & Associates, Practicing Company Secretaries and Secretarial Auditors of the Company.

Kindly take the same on record.

Thanking you,

Yours Truly,

For Kovalam Investment and Trading Company Limited

  
Jyoti Sud

Company Secretary and Compliance Officer



Encl: as above

**P. S. DUA & ASSOCIATES**  
**COMPANY SECRETARIES**

5SF, Sant Isher Singh Nagar, Pakhowal Road, Ludhiana - 141002 (Punjab), Tel. 0161 - 4623424  
E-Mail: [cspsdua@gmail.com](mailto:cspsdua@gmail.com)

**ANNUAL SECRETARIAL COMPLIANCE REPORT**  
**OF**  
**KOVALAM INVESTMENT AND TRADING COMPANY LIMITED**  
**FOR THE YEAR ENDED 31.03.2019**

*(Pursuant to SEBI Circular - CIR/CFD/CMD1/27/2019 dated February 08, 2019 issued by Securities  
Exchange Board of India)*

To

**Kovalam Investment and Trading Company Limited**

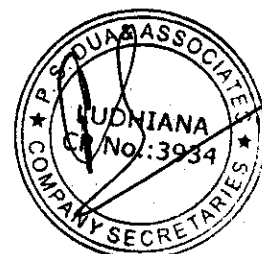
**(CIN: L65910PB1981PLC023058)**

Premises Oswal Woollen Mills Ltd,

G T Road Sherpur, Ludhiana, Punjab

I, Pritpal Singh Dua, Practicing Company Secretary (FCS No: 4552; Certificate of Practice No: 3934) have examined:

- (a) All the documents and records made available to us and explanation provided by **Kovalam Investment and Trading Company Limited** ("the listed entity"),
- (b) The filings/ submissions made by the listed entity to the stock exchanges,
- (c) Website of the listed entity,
- (d) Documents, Reports, Certificates, Declaration, produced before us by the Company and information available at the website of Bombay Stock Exchange & National Stock Exchange as may be relevant, which has been relied upon to make this certification, for the year ended 31.03.2019 ("Review Period") in respect of compliance with the provisions of :



**P. S. DUA & ASSOCIATES**  
**COMPANY SECRETARIES**

5SF, Sant Isher Singh Nagar, Pakhowal Road, Ludhiana - 141002 (Punjab), Tel. 0161 - 4623424

E-Mail: [cspsdua@gmail.com](mailto:cspsdua@gmail.com)

- (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;
  - The Company has appointed a qualified Company Secretary as the Compliance Officer pursuant to Regulation 6(1) of the above regulations with effect from 25.02.2019.
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018-Not Applicable to the Company during the period under review.
- (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 Company during the period under review.
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014- Not Applicable to the Company during the period under review.



**P. S. DUA & ASSOCIATES**  
**COMPANY SECRETARIES**

5SF, Sant Isher Singh Nagar, Pakhowal Road, Ludhiana - 141002 (Punjab), Tel. 0161 - 4623424

E-Mail: [cspsdua@gmail.com](mailto:cspsdua@gmail.com)

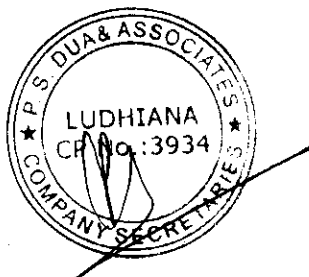
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008- Not Applicable to the Company during the period under review.
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 - Not Applicable to the Company during the period under review.
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; - No trading has taken place in securities of the Company during the period under review as informed to us by the Company and information available at BSE site.

and based on the above examination, 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 thereunder, except in respect of matters specified below:-

Sr. No.	Compliance Requirement (Regulations/ circulars / guidelines including specific	Deviations	Observations/ Remarks of the Practicing Company Secretary
NONE			

- (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 examination of those records.



**P. S. DUA & ASSOCIATES**  
**COMPANY SECRETARIES**

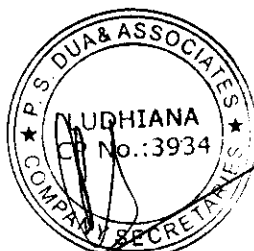
5SF, Sant Isher Singh Nagar, Pakhowal Road, Ludhiana - 141002 (Punjab), Tel. 0161 - 4623424

E-Mail: [cspsdua@gmail.com](mailto:cspsdua@gmail.com)

- (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 under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder as per the information provided to us. **NIL**

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.
NONE				

- The Company has received a letter from Bombay Stock Exchange vide its letter no. LIST/COMP/505585/Reg. 6(1) -Dec18/1113/2018-19, dated February 12, 2019, regarding non- appointment of qualified Company Secretary as Compliance Officer. The same has been replied by the Company vide its letter dated 28.02.2019. Further, the Company has appointed a qualified Company Secretary as the Compliance Officer with effect from 25.02.2019.



**P. S. DUA & ASSOCIATES**  
**COMPANY SECRETARIES**

5SF, Sant Isher Singh Nagar, Pakhowal Road, Ludhiana - 141002 (Punjab), Tel. 0161 - 4623424  
E-Mail: [cspsdua@gmail.com](mailto:cspsdua@gmail.com)

- (d) The listed entity has taken the following actions to comply with the observations made in previous reports: This being the first reporting since the notification of the requirements to submit the report, reporting on actions to comply with the observations made in the previous reports do not arise.

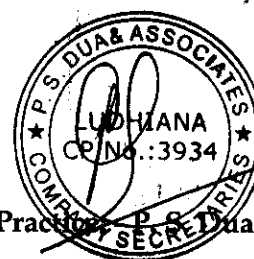
Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the Secretarial Compliance Report for the year ended 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
NOT APPLICABLE, AS THIS BEING THE FIRST REPORT				

Place: - Ludhiana

Date: - 28.05.2019

Signature: -

Name of Company Secretary in Practice: P. S. Dua



FCS No. 4552

C P No. 3934