

30<sup>th</sup> May, 2019

To,  
Listing Compliances  
BSE Ltd,  
P. J. Towers,  
Fort,  
Mumbai – 400 001.

Scrip Code: 512149  
Scrip ID: AVANCE

Dear Sir/ Madam,


**Subject: Secretarial Compliance Report for the year ended March 31, 2019.**

Pursuant to Regulation 24(A) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 enclosed herewith Secretarial Compliance Report issued by Practicing Company Secretary for the year ended March 31, 2019.

This is for your information and records.

Thanking You,

For Avance Technologies Limited

  
Srikrishna Bhamidipati  
Managing Director  
DIN: 02083384





**Secretarial Compliance Report of**

**Avance Technologies Limited for the year ended March 31, 2019**

I Namita Agarwal have examined:

- a) All the documents and records made available to us and explanation provided by Avance Technologies 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 March 31, 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;





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 there under, 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.	Filing of Shareholding Pattern with the Stock Exchange under regulation 31 of SEBI (LODR) Regulations, 2015	The Shareholding Pattern for the quarter ended March 31, 2018 was filed after the due date	The delay was due to non-availability of beneficiary data from NSDL. The Company and its Share Transfer Agent had been following up with NSDL. However, did not receive any response from NSDL due to which there was delay in filing the Shareholding pattern.
2.	Appointment of Women Director under regulation 17(1) of SEBI (LODR) Regulations, 2015.	The office of woman director was not filled by the company.	The Company appointed the Woman Director on 23 <sup>rd</sup> October, 2018.  The Company is now in compliance with regulation 17 (1) of SEBI (LODR) Regulations, 2015.

- 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/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.
1.	Bombay Stock	Non-Compliance of Regulation 31 of SEBI	Penalty of Rs. 23,57,545.60 was	The Company has made written submissions to BSE contesting the







**NAMITA AGARWAL & CO.**  
Company Secretary

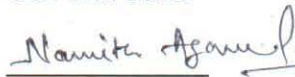
ADDRESS : 2/22 ASHOK NAGAR  
2ND FLOOR, KOLKATA - 700 040  
CONTACT : 8697719757 / 9331926937  
EMAIL : namita.verma99@gmail.com

	Exchange	(LODR) Regulation, 2015 regarding delay in filing Shareholding Pattern for the Quarter ended March 31, 2018	levied on the Company.	penalty as the delay in filing shareholding pattern was because NSDL did not release the beneficiary data even after several reminders from the Company and its Share Transfer Agent.  The Company is yet to receive response from the Exchange on the said submissions.
2.	Bombay Stock Exchange	Non-Compliance with regulation 17(1) of SEBI (LODR) Regulation, 2015 regarding appointment of Woman Director. Woman Director was appointed on 23 <sup>rd</sup> October, 2018.	Penalty of Rs. 5,42,800/- levied on the Company.	The company has filed a written representation seeking waiver of penalty.

- 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
-	-	-	-	-

For Namita Agarwal & Co.  
Company Secretary  
COP No.: 14563

  
Namita Agarwal  
Proprietor  
M No.: 38222



Place: Kolkata  
Date: 28.05.2019