



31st July, 2020

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

Scrip Code : 512149
Scrip ID : AVANCE

Subject: Secretarial Compliance Report for the financial year ended on 31st March, 2020.

Dear Sir/ Madam,

Pursuant to Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Secretarial Compliance Report issued by Practicing Company Secretary for the financial year ended on 31st March, 2020.

You are requested to take the same on your record.

Thanking You,

For Avance Technologies Limited
Sd/-
Srikrishna Bhamidipati
Managing Director
DIN: 02083384

SUNITA MANISH AGARWAL
Practicing Company Secretary
Flat No. 1103, Prima Building, Arkade Art Complex, Vinay Nagar,
Mira Road (E), Thane, Maharashtra -401107
E-mail: cssunitaagarwal@gmail.com; Mob: 80809 08634

Secretarial Compliance Report of

Avance Technologies Limited for the year ended March 31, 2020

I, **Sunita Manish Agarwal** have examined:

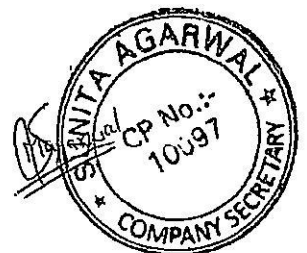
- a) All the documents and records made available to us and explanation provided by Avance Technologies Limited ("the listed entity");
- b) The filings / submissions made by the listed entity to the stock exchanges;
- c) Website of the listed entity;
- d) Any other document / filing, as may be relevant which has been relied upon to make this certification,

For the year ended March 31, 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;
- 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;



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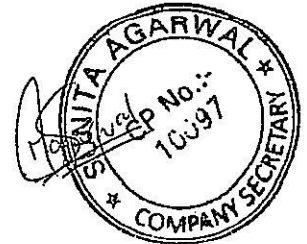
- g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and based on the above examination, I hereby report that, during the Review 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.	Regulation 6(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Company does not have qualified Company Secretary & Compliance Officer	Company is under process to appoint qualified Company Secretary & Compliance Officer

- 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.
-	-	-	-	-

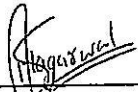
- d) The listed entity has taken the following actions to comply with the observations made in previous reports:



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Sr. No.	Observations of the Practicing Company Secretary in the previous Reports	Observations made in the secretarial compliance report for the year ended 2019. (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
1.	Delay in filing of Shareholding Pattern with the Stock Exchange under regulation 31 of SEBI (LODR) Regulations, 2015 for the quarter ended 31 st March, 2018. Penalty of Rs. 23,57,545.60/- was levied on the Company by BSE Limited for such Non-compliance.	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.	The Shareholding pattern was filled by the Company after receiving the data on 9 th May, 2018. The Company had made written submissions to BSE Limited stating the reason for late filing.	The Company met with compliance under regulation 31 of SEBI (LODR) Regulations, 2015. The Company still looks forward to receive response from BSE Limited.
2.	Appointment of Women Director under regulation 17(1) of SEBI (LODR) Regulations, 2015. Penalty of Rs. 5,42,800/- was levied on the Company by BSE Limited for such Non-compliance.	The Company appointed the Woman Director on 23 rd October, 2018. The Company is now in compliance with regulation 17 (1) of SEBI (LODR) Regulations, 2015.	The Company had appointed Mrs. Shakila Makandar as a Women Director. The Company had filled a written representation seeking waiver of Penalty.	The Company met with compliance under regulation 17 (1) of SEBI (LODR) Regulations, 2015. The Company still looks forward to receive response from BSE Limited.

Sunita Manish Agarwal



Practicing Company Secretary

Membership No: A23524

CP No.: 10097

UDIN: A023524B000531262



Date: 30th July, 2020

Place: Mumbai