

**BSE Limited**  
Department of Corporate Services  
25<sup>th</sup> Floor, P.J. Towers  
Dalal Street  
MUMBAI-400001  
Through BSE Listing  
**Security Code: 500380**

**National Stock Exchange of India Limited**  
"Exchange Plaza"  
Bandra - Kurla Complex  
Bandra (E)  
MUMBAI – 400051  
Through NEAPS  
**Symbol: JKLAKSHMI, Series : EQ**

Dear Sir/ Madam,

**Re: Annual Secretarial Compliance Report**

In terms of Regulation 24A of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8<sup>th</sup> February 2019, we enclose herewith Annual Secretarial Compliance Report dated 19<sup>th</sup> May 2020 issued by Shri Namo Narain Agarwal, Practising Company Secretary, for the Financial Year ended 31<sup>st</sup> March 2020.

Thanking you and assuring you of our best attention at all times.

Yours faithfully,  
For JK Lakshmi Cement Limited

(B.K. Daga)  
Sr. Vice President &  
Company Secretary

Admin Office: Nehru house, 4, Bahadur Shah Zafar Marg, New Delhi-110 002; Phone : 33001142 / 33001112; Fax: 91-011-23722251/23722021

E-mail: jklc.customercare@jkmail.com; Website: www.jklakshmi.com, CIN : L4999RJ1938PLC019511

Regd. & Works Office: Jaykaypuram, Dist. Sirohi, Rajasthan; Phone: 02971-244409/244410; Fax: 02971-244417; E-mail: lakshmi\_cement@lc.jkmail.com

Secretarial Deptt: Gulab Bhawan (Rear Wing) 3<sup>rd</sup> Floor., 6A Bahadur Shah Zafar Marg, New Delhi-110002; Phone: 30179860, 33001142, 33001112; Fax: 91-11- 23739475, E-mail: bkdaga@jkmail.com



# **NAMO NARAIN AGARWAL**

M.Com, L.L.B, Company Secretary, FCS 234, CP 3331

372, Narmada Apartments,  
Alaknanda, New Delhi-110 019  
GSTIN: 07ABVPN0836B2ZM

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## **Secretarial compliance report of JK Lakshmi Cement Limited for the year ended 31<sup>st</sup> March, 2020**

(Pursuant to SEBI circular no. CIR/CFD/CMD1/27/2019 dated February 8, 2019)

I, Namu Narain Agarwal, have examined:

- (a) all the documents and records made available to me and explanation provided by **JK Lakshmi Cement Limited** (“the listed entity”) (CIN L74999RJ1938PLC019511)
- (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, 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; (Not applicable during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; (Not applicable during the review period)
- (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;  
(Not applicable during the review period)
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and circulars/ guidelines issued thereunder;

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 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.	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				

- (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... <i>(The years are to be mentioned)</i>	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
Not applicable				

The prevailing circumstances in the country on account of Lockdown and COVID-19 have impacted, to some extent, verification of documents and records of the company.

Place: New Delhi  
Date: 19<sup>th</sup> May, 2020  
UDIN: F000234B000258305



  
Namo Narain Agarwal  
FCS 234, CP 3331