

## ANNEXURE "A"

### **ANNUAL SECRETARIAL COMPLIANCE REPORT OF AUSTIN ENGINEERING COMPANY LIMITED FOR THE YEAR ENDED 31<sup>ST</sup>MARCH, 2020**

To,  
The Board of Directors,  
**AUSTIN ENGINEERING COMPANY LIMITED**  
Village: Patla, Tal-Bhesan, Via-Ranpur Sorath  
Post-Vishal Hadmatiya, **JUNAGADH GJ 362030 In**

I, **MR. KAUSHIK JAYANTILAL SHAH**, a partner of **SHAHS & ASSOCIATES, COMPANY, COMPANY SECRETARIES**, having office at 305, Hrishikesh-II, Near Navrangpura Bus-Stop, Ahmedabad 380 009 have examined:

- (a) all the documents and records made available to us and explanation provided **including thereon in digital/ electronic mode in COVID-19 pandemic by Austin Engineering Company Limited**, Village Patla, Tal-Bhesan, Dist. Junagadh Gujarat 362 030 ("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 clarification,

For the year ended **31<sup>st</sup>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 there under; and
- (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI");

The specific Regulations, whose provisions and the circulars/ guidelines issued there under, 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; **(Not Applicable to the Company during the Audit Period) ;**
- (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 Audit Period);**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **(Not Applicable to the Company during the Audit Period);**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **(Not Applicable to the Company during the Audit Period);**
- (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 Audit Period) ;**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other regulations as applicable and circulars/ guidelines issued there under;

and based on the above examination, I **MR. KAUSHIK JAYANTILAL SHAH, a partner of SHAHS & ASSOCIATES, COMPANY, COMPANY SECRETARIES** hereby report that, during the said review period:

- (a) The **Austin Engineering Company Limited** 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 Practicing Company Secretary
1	NIL	NIL	NIL

- (b) The **Austin Engineering Company Limited** has maintained proper records under the provisions of the above regulations and circulars/ guidelines issued there under in so far as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against **Austin Engineering Company Limited** / 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 there under:

Sr. No.	Action taken by	Details of violation	Details of action taken e.g. fines, Warring later, debarment	Observations/ remarks of the Practicing company secretary
1	NIL	NIL	NIL	NIL

(d) The **Austin Engineering Company Limited** has taken the following actions to comply with the observations made in our previous reports:

Sr. No.	Observations Of the Practicing Company Secretary in Previous reports	Observation made in the Secretarial compliance report for the Year ended.... (The years to be Maintained)	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the action taken by Austin Engineering Company Limited
1	Not Applicable	NIL	Not Applicable	NIL

Place: AHMEDABAD  
Date: 23<sup>rd</sup> JUNE, 2019

FOR SHAHS & ASSOCIATES  
COMPANY SECRETARIES

(KAUSHIK SHAH)  
PARTNER  
FCS No 2420 CP No 1414  
UDIN: F002420B000367851