

MANJULA NARAYAN B.Com ACS LLB

Company Secretary in Practice

No.22/A, 4th Cross, Venkateshwara Theatre Road, Jayaramshetty Layout,
Devasandra, Krishnarajapuram, Bangalore - 560 036.

☎: +91 80 25613631, Mob: 7795823394, ✉: manjun2006@gmail.com

SECRETARIAL COMPLIANCE REPORT OF ADOR FONTECH LIMITED FOR THE YEAR ENDED 31.03.2019

I/We, Manjula Narayan, Company Secretary in Practice, have examined:

- (a) all the documents and records made available to us and explanation provided by Ador Fontech 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 31st March 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 (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



MANJULA NARAYAN B.Com ACS LLB

Company Secretary in Practice

No.22/A, 4th Cross, Venkateshwara Theatre Road, Jayaramshetty Layout,
Devasandra, Krishnarajapuram, Bangalore - 560 036.

☎: +91 80 25613631, Mob: 7795823394, ✉: manjun2006@gmail.com

- (c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (d) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993;

The company during the year, was not required to comply with the following regulations and consequently not required to maintain any books, papers, minutes, books or other records or file any forms/returns under:

- (a) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;
- (b) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018;
- (c) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
- (d) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
- (e) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;

and based on the above examination, I/We 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			



MANJULA NARAYAN B.Com ACS LLB

Company Secretary in Practice

No.22/A, 4th Cross, Venkateshwara Theatre Road, Jayaramshetty Layout,
Devasandra, Krishnarajapuram, Bangalore – 560 036.

☎: +91 80 25613631, Mob: 7795823394, ✉: manjun2006@gmail.com

- (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.
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... (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
NIL				

Signature: *Manjula Narayan*

Name of the Practicing Company Secretary: Manjula Narayan

Place: Bangalore

ACS/ FCS No.: 28374

Date: 28.05.2019

C P No.: 10150

