RADHE DEVELOPERS (INDIA) LIMITED

May 29, 2019

To,
BSE Limited
25th Floor, P J Towers,
Dalal Street, Fort,
Mumbai – 400 001
Scrip Code : 531273

Dear Sir/Ma'am,

Sub: Annual Secretarial Compliance Report for the Financial Year Ended on March 31, 2019

Pursuant to Regulation 24A of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with SEBI Circular No.: CIR/CFD/CMD1/27/2019, we hereby submit the 'Annual Secretarial Compliance Report" dated May 24, 2019, issued by Mr. Alkesh Jalan, Practicing Company Secretary, Ahmedabad for the Financial Year Ended on March 31, 2019.

You are requested to take the same on your record.

Thanking you,

Yours Faithfully,
For, **Radhe Developers (India) Limited,**

RADHE DEVELOPERS (INDIA) LIMITED AHMEDABAD

Dipen A. Dalal
Company Secretary & Compliance Officer

Encl: A/a

Jalan Alkesh & Associates

B.Com, Company Secretaries
Resolution Professional
(IBBI / IPA-002/IP/N 00718/2018-2019 / 12199)

304, Agrawal Arcade, Nr. Ambawadi Circle,
Ambawadi, Ahmedabad - 380006
Tel. : (079) 40024082 (M) 98255 - 55097
E-mail : jalanalkesh@gmail.com

SECRETARIAL COMPLIANCE REPORT OF **RADHE DEVELOPERS (INDIA) LIMITED FOR THE YEAR ENDED ON 31ST MARCH, 2019**

I, Alkesh Jalan, Proprietor of Jalan Alkesh & Associates have examined:

(a) all the documents and records made available to us and explanation provided by **Radhe Developers (India) Limited**,

(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 (Issue of Capital and Disclosure Requirements) Regulations, 2018; - **NOT APPLICABLE. THE COMPANY HAS NOT COME OUT WITH ANY ISSUE OF SECURITY DURING THE YEAR.**

(c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;

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(d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - **NOT APPLICABLE**

(e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; - **NOT APPLICABLE**

(f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - **NOT APPLICABLE**

(g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; - **NOT APPLICABLE**

(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 Practising Company Secretary
To the Best of our knowledge the Company has complied with the applicable regulations, circulars, guidelines during the year under the review. Our reporting is restricted to the compliances falling under financial year 2018 – 2019			

(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:

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Sr. No.	Action taken	Details of violation	Details of action taken e.g. fines, warning letter, debartment	Observations / Remarks of the Practising Company Secretary, if any.
To the Best of our knowledge no action was taken by SEBI or Stock Exchange against the Company. The Company do not have any subsidiary and hence the question of action against subsidiary does not arise. Further we are unable to comment about the action taken on the promoters or directors. Our reporting is restricted to the compliances falling under financial year 2018 – 2019				

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

Sr. No.	Observations of the Practising Company Secretary in previous reports	Observations made in the Secretarial Compliance Report for year ended on	Actions taken by the listed entity, if any.	Comments on the Practising Company Secretary on the actions taken by the listed entity
Not Applicable. This Is the first year of Annual Secretarial Compliance Report.				

Date : 24/5/2019

Place : Ahmedabad

For, JALAN ALKESH & ASSOCIATES

COMPANY SECRETARIES

JALAN ALKESH & ASSOCIATES AHMEDABAD COMPANY SECRETARIES

ALKESH JALAN

PROPRIETOR

M-No. 15677

COP : 4580