



**RAKESH KUMAR GUPTA**  
**PRACTISING COMPANY SECRETARY**

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**SECRETARIAL COMPLIANCE REPORT of GENNEX LABORATORIES LIMITED**  
For the year ended 31-03-2021

I, Rakesh Kumar Gupta, Company Secretaries, Kolkata have examined:

- (a) all the documents and records made available to us and explanation provided by **GENNEX LABORATORIES LIMITED (CIN: L24230TG1990PLC011168)** ("the listed entity"),
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (c) website of the listed entity,
- (a) any other document/ filing, as may be relevant, which has been relied upon to make this certification,

for the year ended 31<sup>st</sup> March, 2021 ("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 during the review 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 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; **Not Applicable during the review period.**
- (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) The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993.

and circulars/ guidelines issued thereunder;

and based on the above examination, 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:-

#	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practicing Company Secretary
1	Regulation 31 (2) of SEBI (LODR) Regulations, 2015	22.05% of Promoter shareholding is in Demat except 200 shares in physical form.	The company has assured to Demat the shares in the next quarter.

- (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 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:



#	Action taken by	Details of Violations	Details of action taken e.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any
1	BSE Limited	Regulation 17 & 18(1) – December 2020.  Being the Company falls under Top 2000 list of the Market Capitalization as per SEBI (LODR) Regulations, 2015 the company need to maintain of 6 (Six) Directors in the Board. Due date : 22.12.2020 Submission date: 21.12.2020	Shifting of scrips to 'Z' / 'ZP' / 'ZY' group	The Company 2 (Two) Additional Directors on December 21, 2020 and the same communicated to Exchange and they removed the Company name from the list.
2	BSE Limited	Regulation 17 & 17(1A) – December 2020.  Being the Company falls under Top 2000 list of the Market Capitalization as per SEBI (LODR) Regulations, 2015 the company need to maintain of 6 (Six) Directors in the Board.	Imposed fine amount confirmation under Reg.17(1) & 17(1A) with reference to circular SEBI/HO/CFD/CMD/C IR/P/2020/12 - Rs.4,77,900/- BSE email dated: Tue, Mar 05,2021 at 5:33 PM Total fine including GST Rs.503,860/-	Not paid, Company already presented their version to the concerned Listing Officer for waiver of the penalty.

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

#	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
1	Regulation 31 (2) of SEBI (LODR) Regulations, 2015 - 22.05% of Promoter shareholding is in dematerialized except 200 shares in physical form.		Under process	The company has assured to complete dematerialization of the said shares in the next quarter.
2	Regulation 17 & 17(1A) – December 2020.  Being the Company falls under Top 2000 list of the Market Capitalization as per SEBI (LODR)		Applied for Waiver	



Regulations, 2015 the company need to maintain of 6 (Six) Directors in the Board.			
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For **Rakesh Kumar Gupta**  
Company Secretaries

Place: Hyderabad  
Date: 28.06.2021

  


**Rakesh Kumar Gupta**  
ACS:32018, CoP.15143  
UDIN: A032018C000529053

