

May 30, 2019

To,
Corporate Relations Department
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai 400001

Scrip Code:- 532320

Sub:- Annual Secretarial Compliance Report for the year 2018-19

Dear Sir/Madam,

Pursuant to the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February 2019, attached herewith is the Annual Secretarial Compliance Report of the Company for the financial year 2018-19, issued by Ms. Kushla Rawat, Practicing Company Secretary.

Kindly take the same on your record.

Thanking you.

Yours faithfully,

For Vaarad Ventures Limited



Rustom Deboo
Company Secretary

Encl: As above

Annex-A

Secretarial Compliance Report of VAARAD VENTURES LIMITED
For The Year Ended 31st March 2019

To,
The Members,
VAARAD VENTURES LIMITED

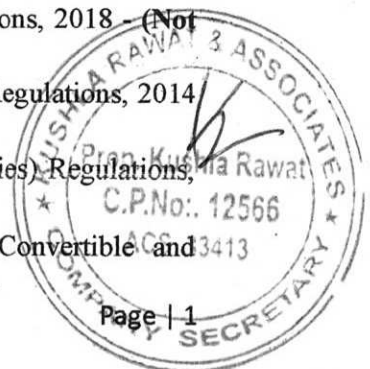
We have examined

All the documents and records made available to us and explanation provided by VAARAD VENTURES LIMITED (The Company);

- (i) The filings/submissions made by the listed entity to the stock exchanges
- (ii) Website of the listed entity,
- (iii) Any other document/filing, as may be relevant, which has been relied upon to make this certification, for the year ended **31st March 2019** 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:-

- (iv) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (v) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment.
- (vi) The following Regulations and Guidelines prescribed under the Securities and Exchange Board of India Act, 1992 (“SEBI Act”):
 - 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 to the company during the review period)**;
 - e. Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 - **(Not applicable to the company 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



KUSHLA RAWAT AND ASSOCIATES
Company Secretaries

Add: A-504, 5th Floor, Parvati Apartment, Shankar Pawse Road, Opp Saibaba Nagar, Katemanevali, Kalyan (E), Thane – 421306, Email ID: kushlarawat@gmail.com/kushlarawatcs@gmail.com, Mob No: 8097314379

Redeemable Preference Shares) Regulations, 2013 - (Not applicable to the company during the review period);

h. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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:-

Sr.No	Compliance Requirement (Regulations / circulars / guidelines including specific clause)	Deviations	Observations/Remarks of the Practicing Company Secretary
1		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.

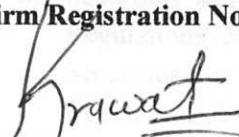
c. The following are the details of actions taken against the listed entity/its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ 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.
1			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
Not applicable as the Annual Secretarial Compliance Report is effective for the financial year ended on 31st March, 2019.				

For Kushla Rawat & Associates
Company Secretaries
Firm/Registration No: I2013MH1092100


(Kushla Rawat)

ACS No: 33413, COP No: 12566

Place: Mumbai
Date: 29/05/2019

