



NAVKAR
BUILDERS LIMITED

18th August, 2021

To
The General Manager-Listing
Corporate Relationship Department
BSE Limited, Ground Floor,
P.J. Towers, Dalal Street, Mumbai

Scrip Code: 531494

Dear Sir/Madam,


SUB: - Annual Secretarial Compliance Report for the F.Y. 2020-21

Pursuant to Regulation 24A of SEBI (LODR) Regulations 2015, please find enclosed herewith Annual Secretarial Compliance Report for the F.Y. 2020-21.

You are requested to take the same on record.

Thanking you,
Yours faithfully

For Navkar Builders Limited


Harsh Shah

Managing Director
DIN: 00561666



**Secretarial compliance report of Navkar Builders Limited for the year ended
31st March, 2021**

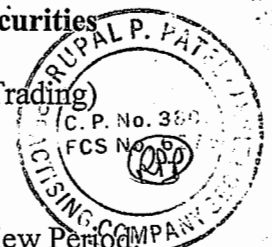
I, Rupal Patel, Practising Company Secretary, having office at 303, Prasad Tower, Opp. Jain Derasar, S.M. Road, Nehrunagar Char Rasta, Ahmedabad – 380015 have examined:

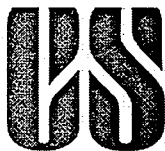
- (a) all the documents and records made available to us and explanation provided by Navkar Builders Limited (“the listed entity”) having registered office at 304, Circle P, near Prahlad Nagar, S.G. Highway, Ahmedabad - 380051,
- (b) the filings/ submissions made by the listed entity to the stock exchanges,
- (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, 2021 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 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;
 - (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 as there is no instance of Buyback during the year under review;**
 - (e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014; **Not Applicable as there is no instance of Share Based Employee Benefits during the year under review;**
 - (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review;**
 - (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013; **Not Applicable as there is no instance of Issue and Listing of Debt Securities during the year under review;**
 - (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- and circulars/ guidelines issued there under;

and based on the above examination, I hereby report that, during the Review Period



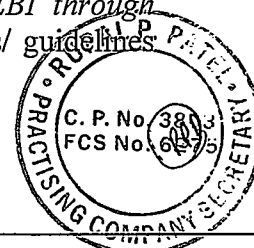


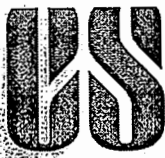
- (a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder, except in respect of matters specified below:-

Sr. No	Compliance Requirement (Regulations/ circulars / guidelines including specific clause)	Deviations	Observations/ Remarks of the Practising Company Secretary
1.	Regulation 27(2)(c) of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	Non-compliance w.r.t. the sign of Compliance officer or CFO in quarterly corporate governance report.	Corporate Governance Report submitted to BSE Limited for quarter ended on 31 st December, 2020 was not signed by Compliance officer of the Company.
2	Regulation 14 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 of the Equity Listing Agreement and Rules, Bye-laws and Regulations of the Exchange.	Delay payment of Annual listing fees.	The Company has not paid Annual listing fee before 25 th August, 2020 for Financial Year 2020-21.
3	Regulation 34 of SEBI (Listing Obligations and Disclosure Requirements) (Amendment) Regulations, 2018 of the Equity Listing Agreement and Rules, Bye-laws and Regulations of the Exchange.	Delay in submitting Annual Report to BSE.	The company has not submitted Annual Report for F.Y. 2019-20 to Stock Exchange within due time period.

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued there under insofar as it appears from my 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 there under:



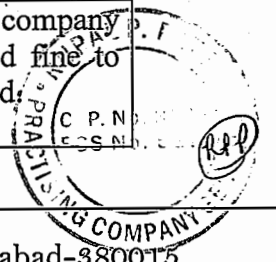


RUPAL PATEL

B. Com., LL.B. FCS

PRACTISING COMPANY SECRETARY

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practising Company Secretary, if any.
1	BSE Limited	Reg-34 of SEBI (LODR) Regulation, 2015 for FY 2013-14	Fine	The company has paid fine to BSE Ltd
2	BSE Limited	Reg-34 of SEBI (LODR) Regulation, 2015 for FY 2014-15	Fine	The company has paid fine to BSE Ltd
3	BSE Limited	Reg-34 of SEBI (LODR) Regulation, 2015 for FY 2015-16	Fine	The company has paid fine to BSE Ltd.
4	BSE Limited	Reg-31 of SEBI (LODR) Regulation, 2015. Late submission of Shareholding pattern for quarter ended on March 2016	Fine	The company has paid fine to BSE Ltd.
5	BSE Limited	Reg-34 of SEBI (LODR) Regulation, 2015. Later submission of Annual Report for FY 2018-19	Fine	The company has paid fine to BSE Ltd.
6	BSE Limited	Reg-29(2) and 29(3) of SEBI (LODR) Regulation, 2015.	Fine	The company has paid fine to BSE Ltd.
7	BSE Limited	Reg-6(1) of SEBI (LODR) Regulation, 2015 for quarter	Fine	The company has paid fine to BSE Ltd.

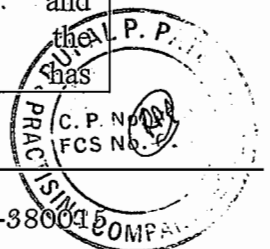




		ended on December 2018 to September 2019.		
8	BSE Limited	Reg-17(1) of SEBI (LODR) Regulation, 2015 for quarter ended on June 2019.	Fine	The company has paid fine to BSE Ltd.
9	BSE Limited	Reg-34 of SEBI (LODR) Regulation, 2015. Later submission of Annual Report for FY 2019-20	Fine	The company has paid fine to BSE Ltd.

(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 the previous reports	Observations made in the secretarial compliance report for the year ended 31 st March, 2020 (The years are to be mentioned)	Actions taken by the listed entity, if any	Comments of the Practising Company Secretary on the actions taken by the listed entity
1	The Company has not opened Dividend Account for payment of dividend during the year under review.	The qualification remark is complied with in the Year 2019-20 and hence no comment is required in the secretarial report for the year ended on 31st March, 2020.	Company has opened their dividend account with ICICI Bank at S.G.Highway Branch.	In the absence to detailed reconciliation of dividend account (FY 2017-18, 2018-19) with the respective name of shareholders name, we could not check and reconciled.
2	Non compliance w.r.t. the sign of Compliance officer or CFO in quarterly corporate governance report.	Corporate Governance Report submitted to BSE Limited for quarter ended on 31 st December, 2020 was not signed by Compliance officer	The company has submitted Corporate Governance Report signed by Compliance Officer of the Company from	The Board of Directors of the Company has taken serious note of the non compliance and onwards, the Company





		of the Company.	next quarter ended on March, 2021	complied with the requirement.
4	The Company has not paid Annual listing fee before 25 th August, 2020	The Company has not paid Annual listing fee before 25 th August, 2020	Company has paid Annual listing fee as on date.	The Board of Directors of the Company has taken serious note of the non compliance and onwards, the Company has complied with the requirement.
5	Delay in submitting Annual Report to BSE.	The company has made not made disclosure of Annual Report for A.Y. 2019-20 to Stock Exchange within due time period.	The company has submitted Annual Report to BSE on 26/01/2021.	The Board of Directors of the Company has taken serious note of the non compliance and onwards, the Company has complied with the requirement.

Date: 30/06/2021
Place: Ahmedabad

Signature: 
Name of Practising Company Secretary: Rupal Patel
C. P. No. 33803
FCS No. 6295
UDIN: F006275C000554658