



Real Growth Commercial Enterprises Ltd.  
(CIN-L70109DL1995PLC064254)

May 25, 2019

The Secretary, Listing Department  
BSE Limited  
25<sup>th</sup> Floor, P.J. Towers, Dalal Street,  
Fort, Mumbai – 400001

**Ref: Security Code: 539691 & Security ID - RGCEL**

**Sub – Annual Secretarial Compliance Report pursuant to SEBI Circular**

Dear Sirs/Madam,

Please find enclosed the Annual Secretarial Compliance Report of Real Growth Commercial Enterprises Limited dated 23<sup>rd</sup> May, 2019, for the year ended March 31, 2019, certified by Mr. Y J Basrar of M/s Y J Basrar and Associates, Practicing Company Secretary.

This report have been issued in terms of SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019.

This is for your information and records.

Thanking You,

Yours faithfully,

**for REAL GROWTH COMMERCIAL ENTERPRISES LIMITED**

**(DEEPAK GUPTA)  
WHOLE TIME DIRECTOR  
DIN:01890274**

*Encl:- As above*



*Y. J. Basrar & Associates*

**Company Secretaries**

A-93, Golf View Appartments  
Saptaparni CGHS Ltd.,  
Plot No. 4, Sector-19B,  
Dwarka, New Delhi-110075  
Ph. : 011-4905 2864, Mob. : 99105 11994  
E-mail : ybasrar@gmail.com

**Secretarial Compliance Report of Real Growth Commercial Enterprises Limited for the  
year ended March 31, 2019**

We, Y J Basrar and Associates have examined:

- a) all the documents and records made available to us and explanation provided by **Real Growth Commercial Enterprises 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 March 31, 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;



- c) Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011(Not applicable to the listed entity during the review period);
- d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 (Not applicable to the listed entity during the review period);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014(Not applicable to the listed entity during the review period);
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(Not applicable to the listed entity 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 to the listed entity during the review period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- i) Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018; 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:-

Sr.No	Compliance Requirement (Regulations/ Circulars/ Guidelines including specific clauses)	Deviations	Observations/ remarks of the Practicing Company Secretary, if any
NIL			





The company has yet to take action to fill up the above vacant posts.

**Place: Delhi**

**Dated: 23.05.2019**

**For Y J Basrar and Associates**  
  
**(Y J Basrar)**

**Prop.**

**CP No. 3528**