



REPORT ON CORPORATE GOVERNANCE

1. Corporate Governance from Devoted Construction Limited (DCL)

Corporate Governance is about commitment to values and ethical business conduct and improves public understanding of the structure, activities and policies of the organization.

Your Company believes that the implementation of good corporate practices bring positive strength among all the stakeholders of the Company, which is key to success for any corporate.

2. Board of Directors

2.1 Board Diversity and Structure

The Board composition is in compliance with the Regulation 17 of the Listing Regulations 2015 as well as the Companies Act, 2013. As on 31st March, 2019, the Company had four Directors on the Board. Presently more than fifty percent of the Board comprises of Non-Executive Directors. Out of the 4 (four) Directors, 1 (One) is Executive Director, 2 (Two) are Non Executive Director 1 (one) is Non-Executive -Independent Director.

The members on the Board possesses adequate experience, expertise and skills necessary for managing the affairs of the Company in the most effective and efficient manner.

2.2 Independent Directors

Mr. Manjeet Puglia is the Independent Director of the Company. The Independent Director has submitted the declaration that they meet the criteria of Independence as per the provisions of Companies Act, 2013 and the Listing Agreement entered into with the Stock Exchanges. None of the Independent Directors is holding directorship in more than 7 listed Companies. The Company has also issued the formal letter of appointments to all the Independent Directors in the manner provided under the Companies Act, 2013 and under the LODR Regulations.

2.3 Familiarisation Programme

In terms of Regulation 25(7) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 entered with the stock exchanges, mandates the Company to familiarize the Independent Directors with the Company, their roles, responsibilities in the Company, nature of the industry in which the Company operates, business model of the Company, etc. through various programmes.

The Company conduct programmes/ presentations periodically to familiarize the Independent Directors with the strategy, business and operations of the Company.

The above programme also includes the familiarization on statutory compliances as a Board member including their roles, rights and responsibilities. The Company also circulates news and articles related to the industry from time to time and provide specific regulatory updates.

The details of such Familiarization programme for Independent Directors in terms of Regulation 25(7) of the Listing Regulations, 2015 are posted on the website of the Company and can be accessed through the following link:- <http://www.devotedconstruction.com/investors.html>

2.4 Board Meetings

During the financial year ended 31st March, 2019, the Board met 7 (Seven) times i.e. on 11.04.2018, 28.05.2018, 05.09.2018, 08.11.2018, 10.12.2018, 29.01.2019, 12.03.2019. The last Annual General Meeting was held on 29th September, 2018. The EGM of the Company were held on 03.12.2018, 25.02.2019.

The attendance of Directors at the Board Meetings held during the financial year ended 31st March, 2019 under review as well as in the last Annual General Meeting and the number of the other Directorships/Committee positions presently held by them are as under:-



Name of Directors	Date of Appointment	Category	No of Board Meetings	No. Of Board meeting attended	Attendance at the last AGM	No of Directorship in other Public Companies	Shareholding in the Company
Mr. Suresh Bohra	10.05.2016	ED	7	6	Present	3	20.25%
Mrs. Babita Bohra (Resigned w.e.f 29.09.2018)	11.04.2018	NENID	7	2	Present	1	3.46%
Mr.Pushpendra Surana	10.05.2016	NENID	7	7	Present	NIL	2.9%
Mr. Syed Liaqat Ali (Resignedw.e.f 28.05.2018)	25.11.2017	NEID	7	1	Not attended	NIL	Nil
Mr. Manjeet Pugalía	10.05.2016	NEID	7	7	Present	1	Nil
Mrs. Shagun Nijhawan	29.09.2018	NENID	7	4	Present	Nil	Nil

* NEID- Non Executive Independent Director, NENID- Non Executive Non Independent Director MD- Managing Director ED- Executive Director

Present Directorships in other Companies/Committee Positions (including Devoted Construction Limited)

S.No.	Name of Director	Directorships (Name of Companies)*	Committee(s) Position		
			Name of the Company	Committee	Position
1.	Mr. Suresh Bohra	1. Microwave Communications Limited 2. Blueblood Ventures Limited 3. Black fox Advisors Private Limited 4. Bohra Industrial Resource Private Limited 5. Crest Comtrade Private Limited 6. Playnlive Sports Welfare Association 7. Black Fox Financial Private limited 8. Media Matrix Worldwide Limited 9. Black fox Financial IFSC Private Limited 10. Devoted Construction Limited	Media Matrix Worldwide Limited	Audit	Member
			Media Matrix Worldwide Limited	Stakeholders Relationship	Chairman
			Media Matrix Worldwide Limited	Nomination & Remuneration	Member
			Blueblood Ventures Limited	Audit	Member
			Blueblood Ventures Limited	Stakeholders Relationship	Member
			Microwave Communications Limited	Audit	Member
			Microwave Communications Limited	Nomination & Remuneration	Member
			Devoted Construction Limited	Audit	Member
			Devoted Construction Limited	Stakeholders Relationship	Member
			Devoted Construction Limited	Stakeholders Relationship	Member
2.	Mr. Pushpendra Surana	1. BlueBlood Ventures Limited 2. Blackfox Advisors Private Limited 3. Devoted Construction Limited 4. Blackfox Financial IFSC Pvt Ltd	Blueblood Ventures Limited	Nomination & Remuneration	Member
			Devoted Construction Limited	Nomination & Remuneration	Member



3.	Mr. Manjeet Pugalia	1. Blueblood Ventures Limited 2. Playnlive Sports Welfare Association 3. Devoted Construction Limited.	Blueblood Ventures Limited	Nomination & Remuneration	Chairman
			Blueblood Ventures Limited	Audit	Chairman
			Blueblood Ventures Limited	Stakeholder Relationship	Chairman
			Devoted Construction Limited	Audit	Chairman
			Devoted Construction Limited	Nomination & Remuneration	Member
			Devoted Construction Limited	Stakeholder Relationship	Chairman
4.	Mr. Syed Liaqat Ali	1. Devoted Construction Limited	Devoted Construction Limited	Audit	Member
			Devoted Construction Limited	Nomination & Remuneration	Chairman
			Devoted Construction Limited	Stakeholder Relationship	Member

* The directorship held by directors as mentioned above does not include directorship of foreign companies, Section 8 Companies, if any.

None of the Directors on the Board hold directorships in more than ten public companies and memberships in more than ten Committees and they do not act as Chairman of more than five Committees across all companies in which they are directors.

2.5 Meeting of Independent Directors

The Independent Directors of the Company meet at least once in every financial year without the presence of Executive Directors or representatives of management. All the Independent Directors strive to be present at such meetings. During the Financial Year ended 31st March, 2019, one meeting was held on 12th March, 2019.

2.6 Evaluation of Board/Independent Directors Effectiveness

In terms of provision of Companies Act, 2013 read with Rules issued there under and as per SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 the Board of Directors, on recommendation of Nomination and

Remuneration Committee, have evaluated the effectiveness of the Board. Accordingly performance evaluation of the Board, each Director and Committees was carried out for the financial year ended 31st March, 2019. The evaluation of the Directors was based on various aspects which, inter alia, included the level of participation in the Board Meeting, understanding their roles and responsibilities, business of the Company and also effectiveness of their contribution.

2.7 Information Placed before the Board -

In addition to the matters which statutorily require Board's approval, the following matters as required under code on Corporate Governance are also regularly placed before the Board :-

- Annual operating plans and budgets and any updates.
- Capital budgets and any updates.
- Quarterly results for the listed entity and its operating divisions or business segments.
- Minutes of meetings of audit committee and other committees of the board of directors.
- The information on recruitment and remuneration of senior officers just below the level of board of directors, including appointment or removal of Chief Financial Officer and the Company Secretary.
- Show cause, demand, prosecution notices and penalty notices, which are materially important.
- Fatal or serious accidents, dangerous occurrences, any material effluent or pollution problems.



- Any material default in financial obligations to and by the listed entity, or substantial non-payment for goods sold by the listed entity.
- Any issue, which involves possible public or product liability claims of substantial nature, including any judgement or order which, may have passed strictures on the conduct of the listed entity or taken an adverse view regarding another enterprise that may have negative implications on the listed entity.
- Details of any joint venture or collaboration agreement.
- Transactions that involve substantial payment towards goodwill, brand equity, or intellectual property.
- Significant labour problems and their proposed solutions. Any significant development in Human Resources/ Industrial Relations front like signing of wage agreement, implementation of Voluntary Retirement Scheme etc.
- Sale of investments, subsidiaries, assets which are material in nature and not in normal course of business.
- Quarterly details of foreign exchange exposures and the steps taken by management to limit the risks of adverse exchange rate movement, if material.
- Non-compliance of any regulatory, statutory or listing requirements and shareholders service such as non-payment of dividend, delay in share transfer etc.

3. Committees of the Board

In terms of the SEBI code on the Corporate Governance, the Board of the Company has constituted the following Committees:-

- Audit Committee
- Nomination & Remuneration Committee
- Stakeholders Relationship Committee

3.1 Audit Committee

The Composition of the Audit Committee is in line with the provision of Section 177 of the Companies Act, 2013 and Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015. The members of the Audit Committee are financially literate and have requisite experience in accounting and financial management.

The Company Secretary acts as Secretary to the Committee. Statutory Auditors is the permanent Invitee.

The followings are the members and their attendance at the Committee Meetings during the financial year ended 31st March, 2019:-

Name of Directors	Designation	No. Of Meetings	
		Held	Attended
Mr. Manjeet Pugalía	Chairman	4	4
Mr. Suresh Bohra	Member	4	4
Mr. Syed Liaqat Ali	Member	4	1

The terms of reference of the Audit Committee are as follows:

- Overseeing the Company's financial reporting process and the disclosure of its financial information to ensure that the financial statements are correct, sufficient and credible.
- Recommending the appointment / re-appointment of external and internal auditors, tax auditors, cost auditors, fixation of statutory audit fees, internal audit fees and tax audit fees and also approval for payment of any other services.
- Review with management, the annual financial statements before submission to the Board.
- Review half yearly un-audited/audited financial results/ review reports.
- Review the financial statements in particular of the investments made by the unlisted subsidiary companies.
- Review with management, performance of external and internal auditors, and adequacy of internal control system.
- Reviewing the adequacy of internal audit function, if any, including the structure of the internal audit department, staffing and seniority of the official heading the department, reporting structure coverage and frequency of internal audit;



- Discussions with statutory auditors before the audit commence about nature and scope of audit as well as have post audit discussions to ascertain any area of concern.
- Approve the appointment of Chief Financial Officer.
- To look into the reasons for substantial defaults in the payment to the depositors, debenture holders, shareholders and creditors, if any.
- Review of the use/application of money raised through Public/Rights/Preferential Issue, if any.
- Approval or any subsequent modification(s) of transactions of the Company with related parties, if any.
- Review and monitor auditors independence and performance and effectiveness of audit process.
- Scrutiny of inter corporate loans and investments.
- Review the Company's financial and Risk Management Policy
- Discussions with internal auditors of any significant findings and follow up thereon.
- Reviewing the findings of any internal investigations by the internal auditors into matters where there is suspected fraud or irregularity or a failure of internal control systems of a material nature and reporting the matter to the board.
- Valuation of Undertakings or assets of the Company where it is necessary.
- To review the functioning of the Whistle Blower / Vigil mechanism.
- Evaluation of Internal Financial control and risk management system.

The Audit Committee during the year has approved the overall framework for RPTs, the Policy on dealing with the RPTs, the policy on materiality of RPTs and the criteria for granting ominous approval in line with the policy of dealing with RPTs in accordance with provisions of the Companies Act, 2013 and SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 .

3.2 Nomination & Remuneration Committee

The Board of Directors of the Company has constituted a Nomination & Remuneration Committee which is responsible for determining the Company's policy on specific remuneration package for Executive Directors including any compensation payment.

The present composition of Nomination and Remuneration Committee is as under:

Name of Member	Designation
Mr. Syed Liaqat Ali	Chairman
Mr. Manjeet Pugalia	Member
Mr. Pushpendra Surana	Member

The terms of reference of Nomination and Remuneration Committee are given below:

- Formulation of the criteria for determining qualifications, positive attributes and independence of a director and recommend to the board of directors a policy relating to, the remuneration of the directors, key managerial personnel and other employees;
- Formulation of criteria for evaluation of performance of independent directors and the board of directors;
- Devising a policy on diversity of board of directors;
- Identifying persons who are qualified to become directors and who may be appointed in senior management in accordance with the criteria laid down, and recommend to the board of directors their appointment and removal.
- Whether to extend or continue the term of appointment of the independent director, on the basis of the report of performance evaluation of independent directors.

In compliance with the provisions of Section 178 of the Companies Act, 2013 and Regulation 19 of the SEBI ((Listing Obligations and Disclosure Requirements) Regulations, 2015, the Board of Directors at their meeting held on 25th November, 2017 formulated the Nomination and Remuneration Policy and the policy on Board Diversity of the Company on the recommendation of Nomination & Remuneration Committee.

Nomination & Remuneration Policy of the Company

The Nomination & Remuneration Policy of Devoted Construction Limited (the "Company") is designed to attract, motivate, improve productivity and retain manpower, by creating a congenial work environment, encouraging initiatives, personal growth and team work, and inculcating a sense of belonging and involvement,



besides offering appropriate remuneration packages and superannuation benefits. The Policy emphasize on promoting talent and to ensure long term sustainability of talented managerial persons and create competitive advantage. The policy reflects the Company's objectives for good corporate governance as well as sustained long term value creation for shareholders.

The guiding principle is that the remuneration and the other terms of employment should effectively help in attracting and retaining committed and competent personnel. While designing remuneration packages, industry practices and cost of living are also taken into consideration

The details of remuneration and perquisites paid to Executive and Non- Executive Directors during the Financial year 2018-2019 are given below:-

Name of Director	Salary	Allowances	Perquisites	Contribution to PF	Sitting Fee	Total
	(in Rs.)					
	Category A – Executive Directors					
Mr. Suresh Bohra	Nil	-	-	-	-	Nil
Category B – Non-Executive Independent Directors/ Non Executive Directors						
Mr. Pushpendra Surana	Nil	-	-	-	-	-
Mrs. Babita Bohra	Nil	-	-	-	-	-
Mr. Syed Liaqat Ali	-	-	-	-	-	-
Mr. Manjeet Pugalia	-	-	-	-	-	-
Mrs. Shagun Nijhawan	71,010	-	-	-	-	71,010

The Company do not make the payment of sitting fees to Non Executive Directors for every Board/Committee Meeting attended by them.

The remuneration paid to Mr. Suresh Bohra as shown under item no 3.2 of Report on Corporate Governance is as per the Section 197 and Schedule V of the Companies Act, 2013 and no approval of Central Government is required.

3.3 Stakeholders Relationship Committee

Pursuant to provisions of Section 178(5) of the Companies Act, 2013, "Stakeholders Relationship Committee" was formed by the Board at their meeting held on 25th November 2017. The scope of the Stakeholders Relationship Committee shall be to consider and resolve the grievances of security holders of company. This Committee looks into transfer and transmission of shares/debentures/bonds etc., issue of duplicate share certificates, issue of shares on rematerialisation, consolidation and sub-division of shares and investors' grievances. This Committee particularly looks into the investors grievances and oversees the performance of the Share Department /Share Transfer Agent and to ensure prompt and efficient investors' services.

The present composition of Stakeholders Relationship Committee is as under:

Sr. No.	Name	Designation	Nature of Directorship
1.	Mr. Manjeet Pugalia	Chairman	Non Executive Independent Director
2.	Mr. Suresh Bohra	Member	Executive Director
3.	Mr. Syed Liaqat Ali	Member	Non Executive and Non Independent Director



The terms of reference of Share Transfer & Investors Grievance Committee are given below:

- i. Efficient transfer/transmission of shares including review of cases for refusal of transfer /transmission of shares and debentures.
- ii. Overseeing the performance of Share Transfer Agent.
- iii. Recommend methods to upgrade the standard of Services to the investors
- iv. Redressal of investors' complaints.
- v. Issue of duplicate / split / consolidated share certificates.
- vi. Dematerialise or Rematerialise the Share Certificates

More details on share transfers, investors' complaints, etc. are given in the shareholder information section of this report.

Company Secretary & Compliance Officer, acts as the Secretary of the aforesaid Committee

3.4 Details of pecuniary relationship/transactions of the Non – Whole Time Directors/their Firms & Companies vis-a-vis the Company during the financial year 2017-2018

Nil

4. General Body Meetings

Location and time where General Meetings held in the last 3 years are given below:

Year	AGM	Location	Date	Time
2018-19	EGM	Delhi	25.02.2019	11:30 A.M.
2018-19	EGM	Delhi	03.12.2018	11:30 A.M.
2018-19	AGM	Delhi	29.09.2018	12:00 P.M.
2017-18	AGM	Delhi	28.09.2017	11:00 A.M.
2016-17	EGM	Delhi	20.05.2016	04:30 P.M.
2016-17	EGM	Delhi	16.05.2016	11:00 A.M.

The following resolutions were passed as Special Resolutions in previous three years AGMs/ EGMs:

Year	AGM/EGM	Subject Matter of Special Resolution	Date	Time
2016-17	EGM	1. Alteration of Articles of Company 2. Conversion of Company from Private to Public	16.05.2016	11:00 A.M.
2016-17	EGM	1. Increase in Authorised Capital of Company 2. Conversion of Company from Private to Public	20.05.2016	04:30 P.M.
2017-18	AGM	No Special Resolution was Passed	28.09.2017	11:00 A.M.
2018-19	AGM	No Special Resolution was Passed	29.09.2018	12:00 P.M.
2018-19	EGM	1. Issue of Unsecured Zero Coupon Optionally Convertible Debentures. 2. Issue of Debentures on Private Placement Basis.	03.12.2018	11:30 A.M.
2018-19	EGM	1. Change in Terms & Condition of Unsecured Zero Coupon Optionally Convertible Debentures (ZOCDS) 2. Authority to Borrow funds 3. Authority To The Board Of Directors To Make /Give /Provide Investments / Loans/ Guarantees / Securities To Joint Venture /Body Corporate 4. To keep Register and Index of Members at other place	25.02.2019	11:30 A.M.

No Special resolution was put through postal ballot during the financial year 2018-19. None of the business proposed to be transacted in the ensuing Annual General Meeting (AGM) require passing a Special Resolution through postal ballot.

1. **Disclosures on materially significant related party transactions that may have potential conflict with the interest of the Company at large.**
None of the materially significant transactions with any of the related parties were in conflict with the interest of the Company. Attention of the members is drawn to the disclosures of transactions with related parties set out in note no. 14 of the Standalone Financial Statements forming part of the Annual Report.
2. **Details of non-compliance by the Company, penalties, strictures imposed on the company by Stock Exchange or SEBI or any statutory authority, on any matter related to capital markets, during the last three years.**



During the year 2018-19, there were no penalties imposed upon the company by Stock exchanges or SEBI or any Statutory Authority on any matter related to capital markets during the last three years.

3. Vigil Mechanism and Whistle Blower Policy of the Company

The Board of Directors of the Company has adopted Whistle Blower Policy. The management of the Company, through this policy envisages to encourage the employees of the Company to report to the higher authorities any unethical, improper, illegal or questionable acts, deeds and things which the management or any superior may indulge in. This Policy has been circulated to employees of the Company and is also available on Company's Website. No employee of the Company is denied access to the Audit Committee.

4. Details of compliance with mandatory requirements and adoption of the non mandatory requirements of this clause

Company has complied with mandatory requirement of SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

5. Secretarial Auditor

Pursuant to the provisions of Section 204 of the Companies Act, 2013 read with corresponding Rules framed there under, M/S MZ & Associates, Practicing Company Secretaries has been appointed as the Secretarial Auditor of the Company to carry out the secretarial audit for the year ending 31st March, 2019.

6. Secretarial Certificates

A Secretarial Audit Report given by the Secretarial Auditors in Form No. MR-3 is annexed with this Report as ANNEXURE – B. There are no qualifications, reservations or adverse remarks made by Secretarial Auditors in their Report.

7. Reconciliation And Share Capital Audit

- (i) Pursuant to SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015 and [(regulation 55A of the SEBI (Depositories and Participants) Regulations, 1996]. with the Stock Exchanges, certificates, on half- yearly basis, have been issued by a Company Secretary in-Practice for due compliance of share transfer formalities by the Company.
- (ii) A Company Secretary in-Practice carried out a reconciliation of Share Capital Audit to reconcile the total admitted share capital with National Securities Depository Limited and Central Depository Service (India) Limited ("Depositories") and the total issued and listed capital. The audit confirms that the total issued/paid-up capital is in agreement with the aggregate of the total number of shares in physical form and total number of shares in dematerialised form (held with Depositories).

8. CEO & CFO certification

The Director (Finance) and Chief Financial Officer (CFO) of the Company gives annual certifications on financial reporting and internal controls to the Board in terms of Regulation 17(8) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015.

9. Means of Communications

The Company's website www.devotedconstruction.com contains Annual Reports, Financial Results, Shareholding Pattern, etc. Management Discussions and Analysis forms part of the Directors' Report, which is posted to the shareholders of the Company.

10. Code of conduct for Board Members and Senior Management Personnel

The Company has adopted a Code of Conduct for Directors and Senior Management Personnel and the same has been posted on the Company's website. The Directors and the Senior Management Personnel affirm the Compliance of the Code annually. A certificate to this effect is attached to this Report duly signed by the as Director (Finance).

11. Shares/Convertible Instruments held by Non-Executive Directors: NIL



GENERAL SHAREHOLDER'S INFORMATION

1. **AGM date , time and venue** : 30th September, 2019, 01:30 P.M.
M-55, 3rd Floor, M block Market, Greater Kailash-II, New Delhi-110048
2. **Financial Year** : 01st April 2018 to 31st March, 2019
3. **Date of Book Closing** : 25TH September, 2019 to 30th September, 2019
(Both days inclusive)
4. **Dividend Payment Date** : NA
5. **Listing on Stock Exchanges** : BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai 400001
6. **Status of Listing Fees** : Paid for FY 2018-2019
7. **Registered Office** : Property No 6, DSII DC Shed 1, Okhla Phase-2 Second Floor ,
New Delhi 110020
8. **Corporate Office** : M-55,3rd Floor, M Block Market, Greater Kailash -II New Delhi-
110048
9. **CIN** : L45500DL2016PLC299428
10. **Website/Email** : www.devotedconstruction.com
11. **Depositories** : **National Securities Depository Ltd.(NSDL)**
4th Floor, 'A' Wing, Trade World
Kamla Mills Compound
Senapati Bapat Marg, Lower Parel
Mumbai - 400 013
Tel: +91-22-24994200, Fax: +91-22-24972993

Central Depository Services (India) Ltd.(CDSL)
Phiroze Jeejeebhoy Towers
28th Floor, Dalal Street
Mumbai - 400 023
Tel: +91-22-22723333, Fax: +91-22-22723199
12. **ISIN** : INE061Z01011
13. **Registrar and Transfer Agents** : Skyline Financial Services Private Limited
14. Members are requested to correspond with the Company's Registrar & Transfer Agents- Skyline Financial Services Private Limited quoting their folio no./DP ID/Client ID No at the following address:

Skyline Financial Services Private Limited:
D-153A, First Floor, Okhla Industrial Area,
Phase-1, New Delhi-110020
Telephone Number:-011-26812683
Fax Number: -011-26812682, Email:info@skylinerta.com
15. **Share Transfer System**
Share Transfer in physical form can be lodged with Skyline Financial Services Private Limited at the above mentioned address. Such Transfer is normally completed within 15 days from the date of receipt. The Company Secretary is duly empowered to approve transfer of shares.



The Total Number of shares transferred in physical form during the financial year 2018-2019

Number of Transfer Deeds	Nil
Number of Shares	Nil

16. Investor's complaints received during the financial year 2018-2019:

There were no investor grievances remaining unattended/pending as at 31st March, 2019.

17. Distribution of Shareholding as on 31st March, 2019:

No. of ordinary Shares	No. of Shareholders	Percentage of total Shareholders	Shares Amount (Rs)	Percentage of total Shareholdings
Up To 5,000	0	0	0	0
5001 To 10,000	0	0	0	0
10001 To 20,000	0	0	0	0
20001 To 30,000	38	55.88	1140000	3.8
30001 To 40,000	0	0	0	0
40001 To 50,000	0	0	0	0
50001 To 1,00,000	6	8.82	360000	1.2
1,00,000 and Above	24	35.29	28510800	95
Total	68	100	30010800	100

18. Categories of Shareholdings as on 31st March, 2019:

S. No.	Category	Shares	%
A	Promoters Holding		
1	Indian Promoters	1594080	53.12
2	Foreign Promoters	-	-
Sub Total (A)		1594080	53.12
B	Public Shareholding		
1	Institutional Investors	-	-
a)	Mutual Funds & UTI	-	-
b)	Banks, Financial Institutions, Insurance Companies(Central/State Government Institutions/Non-Government Institutions)	-	-
c)	Foreign Institutional Investors	-	-
Sub Total (B1)		0.00	0.00
2	Non Institutional Investors		
a)	Private Corporate Bodies	1407000	46.88
b)	Indian Public		
c)	NRIs		
d)	Any other		
i)	Foreign Banks	-	-
ii)	Trusts	-	-
iii)	OCBs		
Sub Total (B2)		1407000	46.88
Total public Shareholding (B=B1+B2)		1407000	46.88
C	Shares held by Custodian and against which depository receipts have been issued	-	-
GRAND TOTAL (A+B+C)		3001080	100



19. Dematerialization of Shares

Trading in the Equity Shares of the Company is only permitted in the dematerialized form as per the Securities and Exchange Board of India (SEBI) circular dated 29th May, 2000.

The Company has established connectivity with both the Depositories viz. National Security Depository Ltd. (NSDL) as well as Central Depository Services (India) Ltd. (CDSL) to facilitate the demat trading. As on 31st March, 2019, the 100 % of the Company Share's Capital is in dematerialized form.

20. Market Price Information:

Month	BSE Limited	
	Highest (in Rs)	Lowest (in Rs)
Apr-2018	-	-
May-2018	-	-
Jun-2018	-	-
July-2018	-	-
Aug-2018	-	-
Sep-2018	-	-
Oct-2018	31.00	29.50
Nov-2018	31.00	29.50
Dec-2018	23.60	15.15
Jan-2019	14.65	13.05
Feb-2019	-	-
Mar-2019	13.80	9.60

21. Stock Codes: BSE: 542002

DECLARATION REGARDING COMPLIANCE OF CODE OF CONDUCT

I, Suresh Bohra, Director of Devoted Construction Limited, hereby declare that all Board Members and Senior Management Personnel have affirmed compliance of the Code of Conduct as on 31st March, 2019.

Place: New Delhi

Date: 04th September, 2019

SD/-
Suresh Bohra
Director