



CS R. Sridharan
PRESIDENT

MCA: 2014

May 5, 2014

Dear Mr. Joseph

Sub: Secretarial Audit under section 204 of the Companies Act, 2013

This is further to our representation dated April 28, 2014, and the discussion we (myself, CS Vikas Y Khare, Vice President, ICSI and CS M. S. Sahoo, Secretary, ICSI) had with you today on the above subject.

2. The rule 9 (1) could be amended as under to meet the immediate needs:

"9. Secretarial Audit Report-(1) For the purposes of sub-section (1) of section 204, the other class of companies shall be as under-

- (a) every company having a paid-up share capital of fifty crore rupees or more; or
- (b) every company having a turnover of two hundred crore rupees or more; or
- (c) every company having outstanding loans or borrowings from banks or public financial institutions exceeding one hundred crore rupees or more at any point of time during the preceding financial year."

With best regards,

Yours sincerely,

(CS R. Sridharan)

Shri M. J. Joseph
Additional Secretary to Government of India
Ministry of Corporate Affairs
Shastri Bhawan, New Delhi.