SUDITI INDUSTRIES LTD.



Admin office: C-3/B, M.I.D.C., T.T.C. Industrial Area, Pawne Village, Turbhe, Navi Mumbai – 400 705 Tel. No: 67368600/10, web site: www.suditi.in E-mail: cs@suditi.in CIN: L19101MH1991PLC063245 Regd.Office: C-253/254, MIDC, TTC INDL.AREA, PAWNE VILLAGE, TURBHE, NAVI MUMBAI – 400 705.

Ref: No. SIL/SD/10/2023-24 Date: 30.05.2023

The Secretary/Corporate Services, BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001.

Ref: Suditi Industries Ltd. (Script Code 521113)
Sub: Regulation 24A of the SEBI (Listing Regulations and Disclosure Requirement)
Regulations, 2015

Dear Sir,

Please find attached herewith the Secretarial Compliance Report dt: 30/05/2023 for the year ended 31st March, 2023 Pursuant to circular CIR/CFD/CMD1/27/2019 dated 08th February, 2019 duly submitted by Secretarial Auditor Shri. Shivhari Jalan, Company Secretary.

Hope the same is in order and request you to make note of the same.

Thanking you,

Yours faithfully,

For Suditi Industries Limited

Pawan Agarwal Chairman

Secretarial Compliance Report

of

Suditi Industries Limited

for the Financial year ended 31st March, 2023

To, The Board of Directors, Suditi Industries Limited. C - 253 / 254, MIDC, T.T.C. Ind. Area, Pawne Village, Turbhe, Navi Mumbai, Maharashtra - 400705.

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by Suditi Industries Limited (hereinafter referred as 'the listed entity'), having its Registered Office at C - 253 / 254, MIDC, T.T.C. Ind. Area, Pawne Village, Turbhe, Navi Mumbai, Maharashtra - 400705. Secretarial Review was conducted in a manner that provided us a reasonable basis for evaluating the corporate conducts/statutory compliances and to provide my observations thereon.

Based on my verification of the listed entity's books, papers, minutes books, forms and returns filed and other records maintained by the listed entity and also the information provided by the listed entity, its officers, agents and authorized representatives during the conduct of Secretarial Review, I hereby report that the listed entity has, during the review period covering the financial year ended on 31.03.2023 complied with the statutory provisions listed hereunder in the manner and subject to the reporting made hereinafter:

- I, Shiv Hari Jalan, Proprietor of Shiv Hari Jalan & Co., Company Secretary in practice have examined:
 - (a) all the documents and records made available to me and explanation provided by Suditi Industries Limited ("the listed entity" or "the Company"),
 - (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, 2023 ("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

Head Office:. 1055, Level 10, Hubtown Solaris, N.S.Phadke Marg, Andheri (East), Mumbai - 400069

Branch Office:. 104, Mahavir Building, 44/46, Kalbadevi Road, Mumbai - 400002

:. shivharijalancs@gmail.com, :.(022) 22075834, 22075835, 26836215, 9869035834



(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 during the review period)
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021;
- (f) The Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; (Not applicable during the review period)
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (h) The Securities and Exchange Board of India (Depositories and Participant) Regulations, 2018;

and circulars/ guidelines issued thereunder.

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

I. (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)	Regulation / Circular No.	Deviatio ns	Actio n Taken by	Type of Action	Details of Violation	Fine Amount	Observations / Remarks of the Practicing Company Secretary	Manageme nt Response	Remarks
1	Securities and Exchange Board of India	Para A.4 of Part A of Schedule III	The Compan y has submitte d	NA	NA	The Compan y has submitte d	NA	The Company has submitted outcome of	Due to technical glitches there is delay of	NA

	(Listing		outcome			outcome		Board	just 17	7
	Obligations		of Board			of Board		Meeting	minutes in	
	and		Meeting			Meeting		held on	submission	
	Disclosure		held on			held on		30.05.2022	of outcome	
	Requirement		30.05.20			30.05.20		to BSE Ltd	of Board	
	s)		22 to			22 to		with delay	Meeting	
	Regulations,		BSE Ltd			BSE Ltd		of just 17	held on	
	2015		with			with		minutes in	30.05.2022	
			delay of			delay of		which	to BSE Ltd	
			17			17		board has	and Board	
			minutes			minutes		approved	took the	
			in which			in which		and	note of the	
		,	board			board		considered	same. The	
			has			has		the audited	Company	
			approve			approved		financial	admitted to	
			d and			and		result for	comply this	
			consider			consider		the quarter	regulation	
			ed the			ed the		and year	henceforth.	
			audited			audited		ended		
			standalo			standalo		31.03.2022.		
		,	ne and			ne and				
			consolid			consolid				
			ated			ated				
			financial			financial				
			result			result for				
			for the			the				
			quarter			quarter				
			and year			and year				
			ended			ended				
			31.03.20		,	31.03.20				
			22.			22.				
2	Securities	Regulation	The	NA	NA	The	NA	The	The	NA
	and	24(1)	Compan			Compan		Company	subsidiaries	
	Exchange	3, 7	y has			y has		has	companies	
	Board of		appointe			appointe		appointed	of the	
	India		d			d		independen	company	
	(Listing		indepen			independ		t director	have	
	Obligations		dent			ent		on the	become the	
	and		director			director		Board of	material	
	Disclosure		on the			on the		unlisted	subsidiaries	
	Requirement		Board of			Board of		material	Companies	
	s)		unlisted			unlisted		subsidiaries	based on	
	Regulations,		material			material		of Listed	negative	
	2015		subsidia			subsidiar		entity on	consolidate	
	2010		ries of			ies of		30.12.2022.	d net worth	
	J		Listed			Listed		30.12.2022.		
			entity						of the	
			5 1			entity on			company	
			on 30.12.20			30.12.20			for the	
			22.			22.			Financial	
			44.						year ended	
									31.03.2022.	
									The Board	
									of Directors	
									of the	
									Company	
		_							has	
								WARI JALAN		
								71	110	
								T	-111	
							1	Mumbai		
							(Mumbai		

	appointed
	independen
	t director
	on the
	Board of
	unlisted
	material
	subsidiaries
	of Listed
	entity on
	30.12.2022.

(b) The listed entity has taken the following actions to comply with the observations made in previous reports:

Company specific clause Practicing Company has made required to meeting of Board of the meeting of Board of very specific clause Practicing Company has made required for the emeting of Board of very specific clause Practicing Company has made required for the emeting of Board of very specific clause Practicing Company has made required for the emeting of Board of very specific clause Practicing Company has made required for the emeting of Board of very specific clause Practicing Company has made required for the emeting of Board of very specific company has made required for the emeting of Board of very specific company has made required for the emeting of Board of very specific of the emeting of Board of Director on Dispersor on Dis	Sr. No.	Compliance	Regulation	Deviatio	Action	Type	Details	Fine	Observation	Manageme	Remarks
Securities and	No.	circulars / guidelines including specific	/ Circular No.	ns	Taken by	of Action	of Violation	Amount	Practicing Company	nt Response	
quarter on or the financial of Re ended before year ended 2,77,3	1	and Exchange Board of India (Listing Obligations and Disclosure Requirement s) Regulations,		submissi on of the financial results within the prescrib ed period for the quarter ended March 31, 2021. The Compan y was required to submit the audited financial result for the quarter ended March	BSE	Fine	submissi on of the financial results within the prescribe d period for the quarter ended March 31, 2021. The Compan y was required to submit the audited financial result for the quarter ended March 31, 2021 on or before June 30,	Rs. 2,77,30 0 (inclusi ve of GST @	Company had called the meeting of Board of Director on June 30, 2021 to consider and approve the following: a) The Audited Financial Results (Standalone and Consolidate d) of the company for the quarter/year ended 31st March 2021 b) To recommend a dividend, if any for the financial year ended 31st March	Company has made request to BSE Ltd for waiver of penalty for delay in the submission of Financial Results on 27.08.2021. The waiver application still pending with BSE	The Compan y has received email from BSE Ltd on July 29, 2021 for levy of fines of Rs. 1,71,100 . Thereaft er the Compan y has received another email from BSE Ltd on August 18, 2021 for levy of fines of Rs. 2,77,300 (Fines

Or	or	The	W.r.t.	August
be	fore	Compan	Notice of	16,
Jun	e 30,	y has	Board	2021)
	21.	submitte	Meeting the	and
	he	d audited	Company	Remind
Cor	npan	financial	has	er for
	has	result for	intimated to	freezing
	mitte	the	the BSE Ltd	of
1 1	d	quarter	on	promote
auc	lited	ended	22.06.2021.	r demat
1 1	ncial	March	However	account.
	sult	31, 2021	due to	The
for	the	on	COVID -	Compan
qu	arter	August	19	y has
	ded	27, 2021.	pandemic	paid the
Ma	arch		conditions	fines of
31,	2021		the meetings	Rs.
	on		to be held	2,53,800
Au	gust		on June 30,	(after
	7,		2021 was	deductin
20	21.		cancelled.	g TDS)
			The	to BSE
			cancellation	Ltd vide
			of meeting	cheque
			with reason	no.
		1	was also	122389
			submitted to	drawn
			BSE	on Axis
			Limited on	Bank
]	June 29,	Ltd. The
			2021.	Compan
			Further the	y has
			Company	made
			had	request
			requested	to BSE
			for	Ltd for
			Extension of	waiver
			Time period	of
			for	penalty
			Submission	for
			of Financial	delay in
			Results	the
			2020-21	submissi
			was also	on of
			submitted to	Financia
			BSE	I Results
			Limited on	on
			June 29,	27.08.20
			2021.	21. The
			Further the	request
			Company	letter
			had called	submitte
			the meeting	d by the
			of Board of	compan
			Director on	y to
			August 20,	BSE Ltd
		-		WARI JALA

Ver-

Mumbai

ony Secreta

2021 to consider and approve the following: a) The Audited Financial Financial Cospositate (Standalone and Consolidate of the dy of the company for the edd of the Compan for the edd of the Compan for the ended 31st Waiver March 2021 b) To recommend a dividend, if if any for the financial year ended 31st March 2021. W. E. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on 27.2021. Thus the Company has deciarred the meeting was adjourned due to lack of quorum and meeting rescheduled on Suggest 27.2021. Thus the Company has deciarred suddled financial result for the quarter ended March 31, 2021 on August 27, 2021						
consider and dissemin and approve the following: a) The Audited Financial Results (Standalone and Consolidate d) of the company for the equarter/year company for the quarter/year dividend, if any for the financial year ended 31st March 2021 Bost Audited The pending with for recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has deelared audited financial result for the quarter ended March 31, 2021 on August 27,				2021 to		is also
approve the following: a) The Audited Financial Results (Standalone and section of the d) of the company for the 27,08.20 quarterlyear ended 31st Waiver March 2021 b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 31.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended audited financial result for the quarter ended audited financial result for the quarter ended March 31, 2021 on August 27, 202						
following: a) The Audited Financial Results (Standalone and Consolidate d) of the company for the quarter/year ended 31st March 2021 b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
a) The Audited Financial Results (Standalone and section of the company for the quarterlyear ended 31st waiver March 2021 b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended audited financial result for the quarter ended audited for the quarter ended farch 31, 2021 on August 27, 2021				following:		
Audited Financial Results (Standalone and Consolidate d) of the company for the company for the quarter/year 2.1. The march 2021 b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 2.7, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, 2021 on August 27,					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
Financial Results (Standalone and and Consolidate d) of the company for the company for the part of the part of the financial year ended 31st March 31st March 32021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
Results (Standalone and Consolidate of the dy of the company for the ended 31st ware ended 31st March 2021 b) To on still pending pending year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the mecting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended audited financial result for the quarter ended march 31, 2021 on August 27, 2021 on August						-
(Standalone ement section of the company for the company for the quarter/year ended 31st waiver application of still part of the financial year ended 31st March 2021. The Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended audited financial result for the quarter ended audited financial result for the quarter ended march 31, 2021 on August 27, 2021 on				CONTRACTOR AND CONTRACTOR OF THE CONTRACTOR OF T		
and Consolidate d) of the company for the company for the 27,08.20 quarterlyear ended 31st waiver March 2021 b) To recommend a dividend, if any for BSE the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
Consolidate d) of the Compan company for the quarter/year quarter/quar						
d) of the company for the 27.08.20 quarterlyear ended 31st waiver March 2021 b) To on still pending a dividend, if any for BSE the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended audited financial result for the quarter ended March 31, 2021 on August 27,						
company for the 27.08.20 quarter/year ended 31st waiver March 2021 application of still pending a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, 2021 on				and makes and more and an arrangement of		
the quarter/year ended 31st March 2021 b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						-
quarter/year ended 31st waiver March 2021 application of still pending a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, Augus						
ended 31st March 2021 by To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, 2021 on August 27, 2021 on August 27, and a financial result for the quarter ended March 31, 2021 on August 27, and a financial result for the quarter ended March 31, 2021 on August 27,				I I		
March 2021 b) To on still pending lepeding leped						
b) To recommend a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				I I		
recommend a dividend, with BSE the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
a dividend, if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, 2021.						
if any for the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, 2021 on August 27,						
the financial year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
year ended 31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
31st March 2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						Liu.
2021. W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
W.r.t. Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				The state of the s		
Notice of Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				1		
Board Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
Meeting the Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				W 100		
Company has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
has also intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27, do not support the declared audited financial result for the quarter ended March 31, 2021 on August 27,						
intimated to the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				has also		
the BSE Ltd on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
on 13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
13.08.2021. However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
However the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
the meeting was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
was adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				525		
adjourned due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
due to lack of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
of quorum and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
and meeting rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
rescheduled on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
on August 27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,				rescheduled		
27, 2021. Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
Thus the Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
Company has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
has declared audited financial result for the quarter ended March 31, 2021 on August 27,						
audited financial result for the quarter ended March 31, 2021 on August 27,				has declared		
financial result for the quarter ended March 31, 2021 on August 27,						
result for the quarter ended March 31, 2021 on August 27,						
quarter ended March 31, 2021 on August 27,						
ended March 31, 2021 on August 27,						
March 31, 2021 on August 27,						
2021 on August 27,						
August 27,						
August 21,						
			<u> </u>	August 21,	15911	

Secre

								2021.		
2	Securities	Regulation	Delayed	BSE	Fine	Delayed	Fine of	Due to delay	The	The
	and	33	submissi			submissi	Rs.	in	Company	Compan
	Exchange		on of			on of the	1,00,30	declaration	has made	y has
	Board of		the			financial	0	of audited	request to	received
	India		financial			results	(inclusi	financial	BSE Ltd	email
	(Listing		results			within	ve of	result for the	for waiver	from
	Obligations		within			the	GST @	quarter	of penalty	BSE Ltd
	and		the			prescribe	18 %).	ended	for delay in	on
	Disclosure		prescrib	9		d period		March 31,	the	Septemb
	Requirement		ed	9		for the		2021. The	submission	er 14,
	s)		period	0		quarter		unaudited	of Financial	2021 for
	Regulations,		for the			ended		financial	Results on	levy of
	2015		quarter			June 30,		result for the	02.09.2021.	fines of
			ended	1		2021.		quarter	The waiver	Rs.
			June 30,			The		ended June	application	1,00,300
			2021.	1		Compan		30, 2021 is	is still	
		1	The	W		y was		not	pending	Thereaft
			Compan			required		completed	with BSE	er the
			y was			to submit		on time and	Ltd.	Compan
			required			the		the		y has
			to			financial		company		received
			submit			result for		has declared		another
			the			the		unaudited		email
			financial			quarter		financial		from
1			result			ended		result for the		BSE Ltd
			for the			June 30,		quarter		on
			quarter			2021 on		ended June		Septemb
			ended			or before		30, 2021 on		er 30,
1			June 30,			August		September		2021 for
			2021 on			14, 2021.		2, 2021 with		levy of
1			or			The		delay of 19		fines of
1			before			Compan		days.		Rs.
1			August			y has				100,300
ł			14,			submitte				(Fines
ľ			2021.			d . ,				as on
			The			financial				Septemb
			Compan y has			result for the				er 30,
			submitte			quarter				2021)
			d			ended				and Remind
			financial			June 30,		(er for
			result			2021 on				freezing
			for the			Septemb				of
			quarter			er 2,				promote
			ended			2021.			}	r demat
	}		June 30,			2021.				account.
			2021 on							The
			Septemb							Compan
			er 2,							y has
			2021.						}	paid the
			_ = =							fines of
										Rs.
}	}								}	91,800
	}									(after
									(deductin
			•				,		HARIJA	

Mumbai

OV Secreta

							g TDS)
							to BSE
							Ltd
			1,				through NEFT
							UTR
							No.
							AXISP0
							0228969
							972
							dated
							01.10.20
							21. The
							Compan
							y has made
						1	request
							to BSE
							Ltd for
							waiver
	1						of
							penalty
							for
							delay in
							the submissi
							on of
							Financia
							l Results
ł							on
							02.09.20
							21. The
							request
							letter submitte
							d by the
							compan
							y to
							BSE Ltd
							is also
							dissemin
							ated by
							BSE Ltd in
							corporat
							e
							announc
							ement
							section
							of the
							Compan
							y on 02.09.20
							21. The
							waiver
							applicati
		 1				HARI JALAN	
					1	7	N.
					11	Mumbai	
						Gnoany Secretary	
ALC: NO						any Secreta	

Vigit .

Securities and a sand a submission on of the financial results within the period for the quarter ended to submist the required to submit the audited financial result for the quarter ended March 31, 2020 on or or before July 31, 2020 on o										on is still pending with BSE Ltd.
	3	Exchange Board of India (Listing Obligations and Disclosure Requirement s) Regulations,	Regulation 33	on of the financial results within the prescrib ed period for the quarter ended March 31, 2020. The Compan y was required to submit the audited financial result for the quarter ended March 31, 2020 on or before July 31, 2020. The Compan y has submitte d audited financial result for the quarter ended March 31, 2020. The Compan y has submitte d audited financial result for the quarter ended March 31, 2020	BSE	Fine	on of the financial results within the prescribe d period for the quarter ended March 31, 2020. The Compan y was required to submit the audited financial result for the quarter ended March 31, 2020 on or before July 31, 2020. The Compan y has submitted audited financial result for the quarter ended March 31, 2020 on Septemb er 11,	has not paid the fine of Rs. 94,400 payable by the company to the BSE Ltd and The Company has made application for waiver of fine on	letter submitted by the company to BSE Ltd is also disseminate d by BSE Ltd in corporate announcem ent section of the Company on 11.09.2020. The waiver application is still pending with BSE	NA

Mumbai

Secre

Septemb		
er 11,		
2020.		

II Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMD1/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS						
1.	Compliances with the following conditions while appointing/re-appointing an auditor								
	i. If the auditor has resigned within 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter; or	NA	No Resignation.						
	ii. If the auditor has resigned after 45 days from the end of a quarter of a financial year, the auditor before such resignation, has issued the limited review/ audit report for such quarter as well as the next quarter; or								
	iii.If the auditor has signed the limited review/ audit report for the first three quarters of a financial year, the auditor before such resignation, has issued the limited review/ audit report for the last quarter of such financial year as well as the audit report for such financial year.								
2.	Other conditions relating to resignation of st	tatutory auditor							
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee:	NA	No resignation						
	a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of information / non-cooperation by the management which has hampered the audit process, the auditor has approached the Chairman of the Audit Committee of the listed entity and the Audit Committee shall								

	b. c.	receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings. In case the auditor proposes to resign, all concerns with respect to the proposed resignation, along with relevant documents has been brought to the notice of the Audit Committee. In cases where the proposed resignation is due to non-receipt of information / explanation from the company, the auditor has informed the Audit Committee the details of information / explanation sought and not provided by the management, as applicable. The Audit Committee / Board of Directors, as the case may be deliberated on the matter on		
	ii. Dis	be, deliberated on the matter on receipt of such information from the auditor relating to the proposal to resign as mentioned above and communicate its views to the management and the auditor.		
	info The app rep the spe wh sub info	ormation:		
3.	has obtain upon res specified	d entity / its material subsidiary ned information from the Auditor signation, in the format as in Annexure- A in SEBI Circular D/CMD1/114/2019 dated 18th 2019.	NA	No resignation



III. I hereby report that, during the review period the compliance status of the listed entity is appended as below:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations / Remarks by PCS
1.	Secretarial Standards: The compliances of the listed entity are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI), as notified by the Central Government under section 118(10) of the Companies Act, 2013 and mandatorily applicable.	Yes	-
2.	Adoption and timely updation of the Policies: • All applicable policies under	Yes	-
	SEBI Regulations are adopted with the approval of board of directors of the listed entities. • All the policies are in conformity with SEBI Regulations and have been reviewed & updated on time, as per the regulations /circulars /guidelines issued by SEBI.		
3.	Maintenance and disclosures on Website:	Yes	-
	The Listed entity is maintaining a functional website.		
	Timely dissemination of the documents/ information under a separate section on the website.		
	• Web-links provided in annual corporate governance reports under Regulation 27(2) are accurate and specific which redirects to the relevant document(s)/section of the website.		
4.	Disqualification of Director:	Yes	-
	None of the Director(s) of the Company is/are disqualified under Section 164 of		

	Companies Act, 2013 as confirmed by the listed entity.		
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.:		
	(a) Identification of material subsidiary companies	Yes	-
	(b) Disclosure requirement of material as well as other subsidiaries	Yes	_
6.	Preservation of Documents:	Yes	-
	The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.		
7.	Performance Evaluation:	Yes	-
	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.		
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	-
	(b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	NA	Refer point 8(a) above
9.	Disclosure of events or information:	Yes	-
	The listed entity has provided all the required disclosure(s) under Regulation 30 along with Schedule III of SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.		

any Secretais

10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-
11.	Actions taken by SEBI or Stock Exchange(s), if any: No action(s) has been taken against the listed entity/its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under SEBI Regulations and circulars / guidelines issued thereunder.	Yes	-
12.	Additional Non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	There is No additional non-compliance observed for any SEBI regulation /circular /guidance note etc.

Assumptions & Limitation of scope and Review:

- 1. Compliance of the applicable laws and ensuring the authenticity of documents and information furnished, are the responsibilities of the management of the listed entity.
- 2. Our responsibility is to report based upon our examination of relevant documents and information. This is neither an audit nor an expression of opinion.
- 3. We have not verified the correctness and appropriateness of financial Records and Books of Accounts of the listed entity.
- 4. This Report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and is neither an assurance as to the future viability of the listed entity nor of the efficacy or effectiveness with which the management has conducted the affairs of the listed entity.

Place: Mumbai Date: 30.05.2023

UDIN: F005703E000429885

For Shiv Hari Jalan & Co. **Company Secretaries**

FRN: S2016MH382700

(Shiv Hari Jalan) **Proprietor**

FCS No: 5703 C.P.NO: 4226

PR No. 1576/2021