

ECOBOARD INDUSTRIES LTD

ECOBOARD®

Ref: EIL/BSE/24A/2024/06

Date: 27th May, 2024

To,
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort,
Mumbai - 400 001

Ref: - Symbol/ Scrip Code: - ECOBOAR/523732

Dear Sir/Madam,

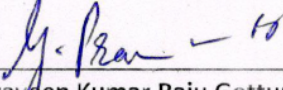
Sub: Annual Secretarial Compliance Report in terms of Regulation 24A of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015 for the year ended on 31st March, 2024.

In terms of the SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 08, 2019, please find enclosed herewith the Annual Secretarial Compliance Report issued to the Company viz. Ecoboard Industries Limited by M/s SD Kolhe & Company through CS Satish Kolhe, (Membership No.: A61229 & COP: 23879) Practicing Company Secretary, for the Financial Year ended 31st March, 2024.

Request you to kindly take the same on record.

Thanking you,

Yours sincerely,
For Ecoboard Industries Limited


Praveen Kumar Raju Gottumukkala
Whole Time Director
DIN: 05180152



Encl.: Annual Secretarial Compliance Report under Regulation 24A of SEBI (LODR) Regulations, 2015



Corporate Office: "ECOHOUSE", 65/1-A Akarshak Building, Opp. Nal Stop Karve Road, Pune 411 004
info@ecoboard.in 020-2543 2345 www.ecoboard.in GST No.: 27AAACE7375B1ZS



Secretarial compliance report of Ecoboard Industries Limited for the year ended March 31, 2024

- A. I Satish Dattatray Kolhe (Practicing Company Secretary) have examined:
- all the documents and records made available to us and explanation provided by Ecoboard Industries Limited (CIN: L24239MH1991PLC064087) ("the listed entity"),
 - the filings/ submissions made by the listed entity to the stock exchanges,
 - website of the listed entity,
 - any other document/ filing, as may be relevant, which has been relied upon to make this certification, for the year ended March 31 2024 ("Review Period") in respect of compliance with the provisions of:
 - the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
 - 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");
- B. The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:-
- Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
 - Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; - Not Applicable During Reporting Period
 - Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - (other regulations as applicable) and circulars/ guidelines issued thereunder;

**Office Address: First Floor, Belleza House, Kranti
Park Lane 1, Near Manipal Hospital, Kharadi, Pune
411014.**

**Email: cs.satishkolhe@gmail.com
Mob: 8329883120, 8237857960**



- C. (**) 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.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/Remarks of the Practicing Company Secretary	Management Response	Remarks
1	In case of any change or appointment of a new share transfer agent, the listed entity shall enter into a tripartite agreement between the existing share transfer agent, the new share transfer agent and the listed entity, in the manner as specified by the Board from time to time.	Regulation 7(4) of SEBI (LODR) Regulation, 2015	The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023	-	-	The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023	-	The company has appointed new Share Transfer Agent M/s Alankit Assignments Limited w.e.f 01/06/2022 and delayed entered into a tripartite agreement dt. 20/12/2023	The company have disclosed the appointment of New RTA to Stock Exchange within time. and delayed entered into a tripartite agreement dt. 20/12/2023	-
2	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements), 2015 - Reclassification of the status of any person as a promoter or public shall be permitted by the stock exchanges only upon receipt of an application from the listed entity along with all relevant documents.	Regulation 31A - SEBI (Listing Obligations And Disclosure Requirements), 2015	The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company	-	-	The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company	-	The Company have applied for Promoters reclassification on 02/10/2021 to BSE but as on 31/03/2024 it was still pending for approval from BSE and further on 02/05/2024, BSE rejected application by sending email communication to the company	The Company have applied for Promoters reclassification on 02/10/2021 and it was rejected on 02/05/2024 further the company is in the process to file revised application by making correction/compliance directed by BSE.	-
3	With reference to Amendment to SEBI (Prohibition of Insider Trading) Regulations, 2015 - Code of Conduct for Listed	Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of	For the Quarter ended June 2023 trading window closed on 7th July 2023.	-	-	For the Quarter ended June 2023 trading window closed on 7th July 2023.	-	For the Quarter ended June 2023 trading window closed on 7th July 2023.	The company has not complied Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition	Inadvertently, the company have delayed complied the provisions of Schedule



	Companies - Trading Window Restriction - Trading window for dealing in securities shall remain closed from the end of the quarter up to 48 hours after declaration of result.	Insider Trading) Regulations, 2015						n of Insider Trading) Regulations, 2015	B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
4	The Listed Entity shall file Compliance Certificate received by RTA (Demat) Within 15 days from the end of the quarter to Stock Exchange.	74(5) of SEBI (Depositories and Participants) Regulations 2018	The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018.			The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018. For Quarter ended 1. June 2023 - 22.07.2023 (Delay) 2. Sept 2023 - 12.10.2023 (Within Time) 3. Dec 2023 - 23.01.2024 (Delay) 4. March 2024 - Filed on 19.04.2024 (Delay)	The Company has filed Compliance certificate delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018. For Quarter ended 1. June 2023 - 22.07.2023 (Delay) 2. Sept 2023 - 12.10.2023 (Within Time) 3. Dec 2023 - 23.01.2024 (Delay) 4. March 2024 - Filed on 19.04.2024 (Delay)	The company has received data delay from RTA.	



D. The listed entity has taken the following actions to comply with the observations made in previous reports:

Sr. No.	Compliance Requirement (Regulations/circulars/guide-lines including specific clause)	Regulation / Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	As per Regulation 31(1) of SEBI (LODR) Regulation, 2015, The listed entity shall submit to the stock exchange(s) a statement showing holding of securities and shareholding pattern separately for each class of securities, in the format specified by the Board from time to time, within 21 days from the end of each quarter, having names of public shareholders holding 1% or more than 1% shares.	Regulation 31(1) of SEBI (LODR) Regulation, 2015	The company has not disclosed names of public shareholders holding 1% or more than 1% shares in the shareholding pattern filed with Stock Exchange.	SEBI	Issued administrative warning dated May 09, 2023	The company has not disclose names of public shareholders holding 1% or more than 1% shares in the shareholding pattern filed with Stock Exchange.		The company has not disclose names of public shareholders holding 1% or more than 1% shares in the shareholding pattern filed with Stock Exchange for the quarter ended march 2022 and June 2022.	The company has filed revised shareholding pattern.	
2	The Company should maintain Structured Digital Database internally in a non-tamperable manner along with time-stamping and audit trail.	Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	The Company has maintained Structure Digital Database in Excel sheet with no time stamp.			The Company has maintained Structure Digital Database in Excel sheet with no time stamp.		The Company has maintained the data in excel sheet in the July 2022 and Sept 2022 quarter and there was reasonable delay within permitted timelines with prior intimation given to recipient.	The Company have maintained Structured Digital Database internally in a non-tamperable manner along with time-stamping and audit trail December 2022 onwards, for previous quarters the company has maintained data in excel sheet and also on time-to-time basis maintain the details	



								of UPSI on SD Drive which accessible to Compliance officer and executive Directors only
3	In case of any change or appointment of a new share transfer agent, the listed entity shall enter into a tripartite agreement between the existing share transfer agent, the new share transfer agent and the listed entity, in the manner as specified by the Board from time to time.	Regulation 7(4) of SEBI (LODR) Regulation, 2015	The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and till date not entered into a tripartite agreement.			The company has appointed new Share Transfer Agent w.e.f 01/06/2022 and till date not entered into a tripartite agreement.	The company has appointed new Share Transfer Agent M/s Alankit Assignments Limited w.e.f 01/06/2022 and till date not entered into a tripartite agreement.	The company have disclosed the appointment of New RTA to Stock Exchange within time and delayed entered into a tripartite agreement dt. 20/12/2023
4	The Listed Entity shall file Compliance Certificate received by RTA (Demat) Within 15 days to Stock Exchange.	74(5) of SEBI (Depositories and Participants) Regulations 2018	The Company has filed Compliance certificate 6 days delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and Participants) Regulations 2018.			The Company has filed Compliance certificate 6 days delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and participants) Regulations 2018.	The Company has filed Compliance certificate 6 days delay to the Stock Exchange as per SEBI Regulation 74(5) (Depositories and participants) Regulations 2018, due date 15/01/2023 and filed on 21/01/2023.	The company has received data delay from RTA. Further the company will take care to file all declaration on time.
5	The promoters of the company should file the declaration under reg. 31(4) of SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011. with the Exchange and with audit committee of the target company, within 7 days from the end of Financial Year.	31(4) of Securities and Exchange Board Of India (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011	The promoters of the company have not filed the declaration under reg. 31(4) of SEBI (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011., with the Exchange for the year ended March 31, 2023		Stock Exchange seek clarification from the company.	The promoters of the company have not filed the declaration under reg. 31(4) of SEBI (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011., with the Exchange for the year ended March 31, 2023	The promoters of the company have not filed the declaration under reg. 31(4) of SEBI (Substantial Acquisition Of Shares And Takeovers) Regulations, 2011. with the Exchange for the year ended March 31, 2023, within 7 days from the end of Financial Year.	The promoters of the Company have filed declaration delay, Further the company will take care to file all declaration on time.



E. 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.	<p>Secretarial Standards:</p> <p>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.</p>	YES	The Listed entity has complied 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.
2.	<p>Adoption and timely updation of the Policies:</p> <ul style="list-style-type: none"> ● All applicable policies under 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 	YES	The Listed entity has Adopted and updated the policies applicable under SEBI Regulations.
3.	<p>Maintenance and disclosures on Website:</p> <ul style="list-style-type: none"> ● 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 re-directs to the relevant document(s)/ section of the website 	YES	The Listed entity has Maintained functional and updated website.
4.	<p>Disqualification of Director:</p> <p>None of the Director(s) of the Company is/ are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.</p>	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.	<p>Details related to Subsidiaries of listed entities have been examined w.r.t.:</p> <p>(a) Identification of material subsidiary companies</p> <p>(b) Disclosure requirement of material as well as other subsidiaries</p>	NA	There are no subsidiaries to listed entity.



6.	<p>Preservation of Documents:</p> <p>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.</p>	YES	The listed entity has maintained and preserved 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.	<p>Performance Evaluation:</p> <p>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.</p>	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.	<p>Related Party Transactions:</p> <p>(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or</p> <p>(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.</p>	YES	The listed entity has obtained prior approval of Audit Committee for all related party transactions.
9.	<p>Disclosure of events or information:</p> <p>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.</p>	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.
10.	<p>Prohibition of Insider Trading:</p> <p>The listed entity is in compliance with Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>	YES	The Company has maintained structured digital database as per the requirement of Regulation 3(5) & 3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.
11.	<p>Actions taken by SEBI or Stock Exchange(s), if any:</p> <p>Following 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 except as provided under separate paragraph herein (**).</p> <p>1. The Company has received Administrative Warning Letter from Securities and Exchange Board of India (SEBI) dated May 09, 2023,</p>	NO	The Company has received Administrative Warning Letter from Securities and Exchange Board of India (SEBI) dated May 09, 2023, regarding non disclosing name of public shareholders holding 1% or more than 1% shares, as per regulation 31(1) of SEBI (LODR) Regulation, 2015, further the company has given point wise reply to SEBI for the same.

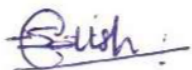


	regarding non disclosing name of public shareholders holding 1% or more than 1% shares, as per regulation 31(1) of SEBI (LODR) Regulation, 2015.		
12.	Resignation of statutory auditors from the listed entity or its material subsidiaries: In case of resignation of statutory auditor from the listed entity or any of its material subsidiaries during the financial year, the listed entity and / or its material subsidiary(ies) has / have complied with paragraph 6.1 and 6.2 of section V-D of chapter V of the Master Circular on compliance with the provisions of the LODR Regulations by listed entities.	YES	No statutory auditor has resigned during the reporting period.
13.	Additional Non-compliances, if any: **additional non compliances list is given below in point E of this report.		

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 certify 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 the 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.

For S D Kolhe and Company.
Company Secretaries





Satish D Kolhe
Proprietor
ICSI Membership No: A61229
CP No: 23879
UDIN: A061229F000436111
Peer Review No: 5571/2024
Date: 23rd May 2024.
Place: Pune