

# Cimmco Limited



REGISTERED OFFICE  
756 ANANDAPUR  
E M BYPASS,  
KOLKATA- 700107  
CIN: L28910WB1943PLC168801

TEL : (033) 4019 0800  
FAX : (033) 40190823  
WEBSITE: [www.cimmco.in](http://www.cimmco.in)  
E-MAIL: [corp@cimmco.in](mailto:corp@cimmco.in)

25<sup>th</sup> June, 2020

1. National Stock Exchange of India Limited  
Listing Department  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai 400051  
Scrip Code: CIMMCO
2. BSE Limited  
Department of Corporate Services-CRD  
1<sup>st</sup> floor, Phiroze Jeejeebhoy Towers  
Dalal Street, Mumbai -400001  
Scrip Code: 505230

**Re: Submission of Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2020**

Dear Sirs,

Pursuant to the circular CIR/CFD/CMD 1/27/2019 of SEBI dated 8<sup>th</sup> February, 2019 and Regulation 24A of SEBI (LODR) Regulations 2015, we submit herewith Secretarial Compliance Report of the Company issued by CS Sumantra Sinha, Practising Company Secretary for the year ended 31<sup>st</sup> March, 2020.

Please take the above on record.

Thanking you,

Yours faithfully,  
For Cimmco Limited

  
Dinesh Arya  
Group Company Secretary

Encl: As stated above

# CS Sumantra Sinha

Practising Company Secretary

36, Ballygunge Place, 3<sup>rd</sup> Floor  
Kolkata 700019



## Secretarial compliance report of Cimmco Limited for the year ended 31<sup>st</sup> March, 2020

I, CS Sumantra Sinha, Practising Company Secretary, have examined:

- all the documents and records made available to us and explanation provided by Cimmco Limited (L28910WB1943PLC168801) ("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 31<sup>st</sup> March, 2020 ("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");

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;
  - 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;
  - Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014;
  - Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008;
  - Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013;
  - Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
  - 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:

- 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)	Deviations	Observations/ Remarks of the Practicing Company Secretary
		Nil	NA

# CS Sumantra Sinha

Practising Company Secretary

36, Ballygunge Place, 3<sup>rd</sup> Floor

Kolkata 700019



- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/ guidelines issued thereunder insofar as it appears from my/our examination of those records.
- (c) The following are the details of actions taken against the listed entity/ its promoters/ directors/ material subsidiaries either by SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by SEBI through various circulars) under the aforesaid Acts/ Regulations and circulars/ guidelines issued thereunder:

Sr. No.	Action taken by	Details of violation	Details of action taken E.g. fines, warning letter, debarment, etc.	Observations/ remarks of the Practicing Company Secretary, if any.
		Nil	Nil	NA

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended 2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1	NIL	It was noted that the public shareholding in the Company as at March 31, 2019 was 20.512%, which was below the Minimum Public Shareholding ('MPS') of 25% as stipulated by Rule 19A(2) of the Securities Contracts (Regulation) Rules, 1957 ('SCRR').	The MPS was achieved on 07.06.2019 upon the conclusion of the 3 <sup>rd</sup> Offer of Sale of shares by Promoters. Suitable clarification was made in this regard by the Company in the notes to the Financial Statement /Directors' Report for the year ended March 31, 2019.	The Company complied with the MPS requirement w.e.f. 07.06.2019 and therefore the observation was addressed.



*Sumantra Sinha*

(CS Sumantra Sinha)  
Practising Company Secretary  
ACS-11247 / CP-15245

Place: Kolkata

Date: 24<sup>th</sup> June 2020