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.

Date: May 29, 2024

To, Listing Compliance Department BSE Limited Phiroze Jeejeebhoy Tower, Dalal Street, Fort Mumbai - 400 001

Reference: Suditi Industries Ltd. (Scrip Code 521113) /ISIN: INE691D01012

<u>Sub: Disclosure – Compliance under Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.</u>

Dear Sir,

In terms of Regulation 24(A) of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, please find enclosed herewith Annual Secretarial Compliance Report duly issued by Mitesh J. Shah, Practicing Company Secretary, for the Financial Year Ended March 31, 2024.

Kindly take the same on record.

Thanking you,

For SUDITI INDUSTRIES LIMITED

PAWAN Digitally signed by PAWAN AGARWA AGARWAL Date: 2024.05.29 17:10:51 + 05'30'

Pawan Agarwal Director

DIN: 00808731

Encl: As above



SECRETARIAL COMPLIANCE REPORT OF SUDITI INDUSTRIES LIMITED (CIN: L19101MH1991PLC063245) FOR THE FINANCIAL YEAR ENDED ON MARCH 31, 2024

- 1. I, Mitesh Shah, Practicing Company Secretary and Proprietor of M/s. Mitesh J. Shah and Associates have examined:
 - a) all the documents and records w.r.t listing compliances provided to us and explanation provided by Suditi Industries Limited ("the Company"),
 - b) the filings / submissions made by the Company to the stock exchange i.e. BSE Limited.
 - c) website of the Company,
 - d) any other documents / filings, 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:

- i) the Securities and Exchange Board of India Act, 1992 ("SEBI Act") and the Regulations, circulars, guidelines issued thereunder; and
- ii) 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");
- 2. 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 (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; (there were no events requiring compliance during the review period);
 - c) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
 - d) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018;
 - The Securities and Exchange Board of India (Registrars to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
 - Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;



- g) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; (there were no events requiring compliance during the review period);
- Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018; (there
 were no events requiring compliance during the review period);
- Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities)
 Regulations, 2021; (there were no events requiring compliance during the review
 period);
- j) The Securities and Exchange Board of India (Delisting of Equity Shares) Regulations, 2021; (there were no events requiring compliance during the review period).
- 3. Based on the above examination, 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: i) All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entities ii) 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	-
3.	Maintenance and disclosures on Website: i) The Listed entity is maintaining a functional website; ii) Timely dissemination of the documents/ information under a separate section on the website;	Yes	-



	iii) 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		
4.	Disqualification of Director:	Yes	-
	None of the Director(s) of the Company		
	are disqualified under Section 164 of		
	Companies Act, 2013 as confirmed by		
	the listed entity.		
5.	Details related to Subsidiaries of listed	NA	1_
	entities have been examined w.r.t.:	100	
	i) Identification of material		
	subsidiary companies;		
	ii) Disclosure requirement of		
	material as well as other		
	subsidiaries.		
6.	Preservation of Documents:	Yes	
0.		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,		5
	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:	Yes	-
	The listed entity has obtained prior		
	approval of Audit Committee for all		
	related party transactions;		*
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.		
10.	Prohibition of Insider Trading:	Yes	-
	The listed entity is in compliance with	. 55	
	Regulation 3(5) & 3(6) SEBI (Prohibition		
	of Insider Trading) Regulations, 2015.		
	0,		



A TOP TO THE PROPERTY OF THE P

11.	Actions taken by SEBI or Stock	NA	-
	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.		
12.	Additional Non-Compliances:	NA	-
	No any additional non-compliance		ń.
	observed for all SEBI		
	Regulation/circular/guidance etc.		

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 condi auditor:		ing/re-appointing an
	 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 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. 	NA	-
2.	Other conditions relating to resignation of	f statutory auditor:	
	i) Reporting of concerns by Auditor with respect to the listed	NA	-



- entity/its material subsidiary to the Audit Committee:
- a) In case of any concern with the management of the listed entity/material subsidiary such non-availability 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 receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.
- b) 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.
- c) The Audit Committee / Board of Directors, as the case may 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.
- Disclaimer in case of non-receipt of information:
 The auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards





	of Auditing as specified by ICAI / NFRA, in case where the listed entity/ its material subsidiary has not provided information as required by the auditor.		
3.	The listed entity / its material subsidiary has obtained information from the Auditor upon resignation, in the format as specified in Annexure- A in SEBI Circular CIR/ CFD/CMD1/114/2019 dated 18th October, 2019.	NA	-

- 4. Based on the above examination, I hereby report that, during the Review Period:
 - 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.	Complia	Regulati	Deviati	Actio	Туре	Details	Fine /	Observa	Management	Remar
No.	nce	on/Circu	on	n	of	of	Amou	tion/Re	Response	ks
	Require	lar No.		take	Actio	Violati	nt	marks of		
	ments			n by	ns	on		the PCS		
01.	Securiti	Regulati	Non-	NA	NA	The	-	The	Company was	NA
	es and	on 26A	appoint			Compa		Compan	looking for a	
	Exchang		ment of			ny has		y has not	suitable	
	e Board		CFO			not		appointe	candidature for	
	of India		(KMP)			appoin		d Chief	the post of	
	(Listing		(KIVIF)			ted		Financial	Chief Financial	
	Obligati					Chief		officer as	officer as	
	ons and					Financi		required	required under	
	Disclosu					al		under	Regulation 26A	
	re					officer		Regulati	of SEBI (LODR)	
	Require					as		on 26A	Regulations,	
	ments)				27	require		of SEBI	2015.	
	Regulati					d		(LODR)		
	ons,			a		under		Regulati	Further, the	
	2015.					Regula		ons,	Company is	
						tion		2015	now appointing	
						26A of			Ms. Seeta Shah	
						SEBI			as a CFO in the	
						(LODR)			Board meeting	
						Regula			to be held on	
						tions,			30.05.2024.	
						2015				



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

Sr.	Complia	Regulati	Deviati	Actio	Type	Details	Fine /	Observation	Management	Rem
No.	nce	on/Circu	on	n	of	of	Amou	/Remarks of		arks
	Require	lar No.		take	Actio	Violati	nt	the PCS	Response	aiks
	ments			n by	ns	on				
01.	Securiti	Part A.4	The	NA	NA	The	NA	The	Due to	-
	es and	of Part A	Compa			Compa		Company	technical	
	Exchang	of	ny has			ny has		has	glitches, there	
	e Board	Schedule	submitt			submit		submitted	is a delay of	
	of India	Ш	ed			ted		outcome of	just 17	
	(Listing		outcom			outco		Board	minutes in	
	Obligati		e of			me of		meeting	submission of	
	ons and		Board			Board		held on	outcome of	
	Disclosu		meetin			meetin		30.05.2022	Board	
	re		g held			g held		to BSE Ltd.	meeting held	
	Require		on			on		With a delay	on 30.05.2022	
	ments)		30.05.2			30.05.		of 17	and Board	
	Regulati		022 to			2022		minutes in	took note of	**
	ons,		BSE Ltd.			to BSE		which board	the same. The	
	2015		With a			Ltd.		has	Company	
			delay of			With a		approved	admitted to	
			17			delay		and consider	comply this	
			minutes			of 17		the audited	regulation	
			in which			minute		financial	henceforth.	
			board			s in which		result for the		
			has			board		quarter and		
			approv			has		year ended 31.03.2022		
			ed and			approv		31.03.2022		
			conside			ed and				
			r the	-		consid				
			audited			er the				
			standal	ĺ		audite				
			one			d				
			and			standal				
			consoli			one				
			dated			and				
			financia			consoli				
			l result			dated				
			for the			financi				
			quarter			al				
			and			result				
			year			for the				
			ended			quarte				
			31.03.2			r and				
			022			year				
shall	1 & ASO					ended				

FCS No. 10070 C.P. No. 12891

O2. Securiti es and on 24 (1) Compa (1) Compa (1) Particles of India (Usting on sand on 25 (1) Compa (1) Particles of Listed entity on 30.12.2022 on the Board of India (Usting on sand on sand on sand on sand on sand on the Board of Listed entity arises of Listed entity on 30.12.2022 on the Board of India (Usting on sand on the Board of Listed entity on a subsidiar ent							31.03. 2022.				
es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require es and Exchang e Board of India (Listing Obligati ons, and Disclosu on the re Board of India (Listing Obligati ons, and Disclosu on the re Board of India ons, and Disclosu ons and Disclosu ons and Disclosu ons, and Disclosu ons and Disclosu re Require ments) Regulati ons and Disclosu ons, and Disclosu ons and Disclosu on	02		D 1 11	7		ļ					
Exchang e Board of India (Listing Obligati ons and Director On the Board of India ons and Disclosu re Require ments) Regulati ons, 2015 33 Securiti es and Exchang e Board of Listed entity on a 30.12.2 on the Board of Listed entity on a 30.12 on the Board of Listed entity on a 30.12 on the Board of Listed entity on a 30.12 on the Board of Listed entity on a 30.12 on the Board of Listed entity on a 30.12 on the Board of Listed entity on a 30.12 on the	02.	I was seen to be a	_	1	NA	NA		NA		1	-
e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re re Require ments) Regulati ons, 2015 34 Securiti re s and Exchang e Board of India (Listing Obligati ons and Disclosu re re Require ments) Regulati ons, 2015 35 Securiti re s and Exchang e Board of Ir results of the or of on and Exchang of Board of Ir results of the or or on the Board of Unlisted of the meeting of Ir results of Ir results of the or or on the Board of Unlisted of the meeting of Director on the Board of Unlisted of the meeting of Director on the Regulati on of Ir results of Ir results on all of results of Ir results of the or results of the results of Ir results of the or results of the nements) Regulati on of the meeting of plane of prescrib or the quarter ments) Regulati on of the distribution of the d		1	011 24 (1)								
of India (Listing Obligati ons and Disclosu re Require ments) 2015 2015 2016 2016 2017 2018 2018 2019 201		1								and the second s	
(Listing Obligati ons and Disclosu on the Require ments) Regulati ons, and consider and Exchang e Board of India (Listing Obligati ons and Disclosu re and Exchang e Board of India (Listing Obligati ons and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang e Require ments) Regulati ons, and Disclosu re and Exchang be Require ments) Regulati ons, and Disclosu re and Di		1									
Obligati ons and Disclosu re Require ments) Regulati ons, 2015 3 Securiti es and Exchang Exchang of Board of India (Listing Obligati on sand Disclosu prescrib re Require ments) 1 The Company for the subsidiaries of the submiss ion of the submiss ion of the submiss ion of the submiss ion of the submiss on the submiss of the submiss on the submiss of the submiss on the submiss of the submis the submis of the submiss on the submiss of the submiss on the submiss on the submiss of the submiss on the submiss on the submiss of the submiss on the submiss of the submiss o									1		
ons and Disclosu re Board of Require ments) Regulati ons, 2015 30 Securiti es and Exchang e Board of India (Listing of India (Listing of India (Listing on Sand Disclosu re Require ments) Regulati ons and Disclosu re ended period on sand Disclosu re Require ments) Regulati ons and Disclosu re ended period ments) Regulati ons, 2015 Direct or on the material subsidiaries of the Company for the Company for the Company for the Company for the Consolidated net worth of the Company for the Consolidated net worth of the Company for the Consolidated net worth of the Consolidated networth of the Consolidate netity on 30.12.2022 The Board of Unitsed material subsidiaries of Listed entity on 30.12.2022 The Board of Unitsed material subsidiaries of Listed entity on 30.12.2021 The Board of Unitsed material subsidiaries of		1.									
Disclosu re Require ments) Regulati ons, 2015 Securiti es and Exchang e Board of India (Listing of India (Listing Obligati ons and Disclosu prescrib re Require ments) Regulati on, 30 Securiti es and of India (Listing Obligati ons and Disclosu prescrib re Require ments) Require ments) Regulati on, 30 Securiti es and Disclosu prescrib re Require ments) Regulati on, 30 Securiti on, 30 Securiti es and of India (Listing Obligati ons and Disclosu prescrib re Require ments) Regulati on, 30 Securiti on, 31, 31, 31, 31, 31, 31, 31, 31, 31, 31		_								the second sections are a second	
Require ments) Regulati ons, 2015 30.12.2022 30.12.2022 30.12.2022 30.12.2022 30.12.2022 30.12.2022 30.12.2022 30.12.2022 The Board of Directors has appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Directors has appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Directors has appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Directors has appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Company had called the meeting of Board of Sill of S		Disclosu		on the			or on		The second secon		
ments) Regulati ons, 2015 Subsidia ries of Listed entity on 30.12.2022 on 30.12.2 O22 Delayed submiss ion of financia (Listing Obligati ons and Disclosu re Require period ons and Disclosu re Regulati ons, 2015 March Disclosu re Regulati ons, 2015 March Regulati ons, 2015 Securiti es and Disclosu re Regulati ons, 2015 March Amarch Amarch Company diff of unlisted subsidia ries of Listed subsidia raies of Directors has appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Company has made re re re do fo Board of Oblegati on of genalty for delay in the submission of financial re re re re do for penalty re re re do for company had called re re re do for Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 The Company has made re re re re red renetis Oblegati on 30.12.2022 The Company has made re		re		Board			the		subsidiaries		
Regulati ons, 2015 Regula				of			Board		of Listed	consolidated	
Ons, 2015 Ons, 2015 I subsidia ries of Listed entity on 30.12.2 on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2 on the Board of Unlisted material subsidiaries of Listed entity on 30.12. 2022 O22 O3 Securiti es and Exhang e Board of India (Listing Obligati ons and Disclosu re Require ments) for the period ended Disclosu re Regulati ons, 2015 O3 Securiti es and Exhang ion of the prescrib of India (Listing Obligati ons and Disclosu re ended ments) for the period ended ons, 2015 O3 Securiti ries of Listed entity on 30.12. 2022 O4 Delayed BSE Fine do on 30.12. 2022 O5 Delayed on 30.12. The Board of Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 O5 Delayed on 30.12. The Company has made request to BSE of Fine (inclu (inclu financia) of Board of Seard of Director on delay in the submission of results GST 2021 to to on the meeting of penalty for applied of Source of Director on delay in the submission of Financial Results on approve the following: application application still pending with BSE Ltd. O5 Delayed on The Delayed on The Financial Results on application and the period and Consolidate and SEL Consolidate and SEL Consolidate and Consolidate and SEL Consolidate and Consol				unlisted			of		entity on	net worth of	
2015 Subsidia ries of Listed entity on 30.12.2 022 015 016 01				materia					30.12.2022	the Company	
ries of Listed entity on 2015. Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Require ments) Require ments) Regulati ons, 2015. March Securiti es of Listed entity appointed independent Director on the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 BSE Fine Delaye on Gord of Unlisted material subsidiaries of Listed entity on 30.12.2022 BSE Fine Delaye of Gord of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Unlisted material subsidiaries of Listed entity on 30.12.2021 The Waiver of penalty for delay in the submission of still pending with BSE Ltd. The Waiver of Director on the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 The Board of Unlisted material subsidiaries of Listed entity on 30.12.2021 The Waiver Office Penden and Submiss of Unlist											
Listed entity on 30.12.2 022		2015			2						
entity on 30.12.2							1				
On 30.12.2 022 022 03 07 08 08 08 09 09 09 09 09											
30.12.2 022 entity on							1				
O22 On 30.12. 2022 On 30.12. 2022 On the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Gompany has made request to BSE and Called the meeting of Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Gompany has made request to BSE and Called the meeting of Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Gompany has made request to BSE and Called the meeting of Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Gompany has made request to BSE and Called the meeting of Board of Unlisted material subsidiaries of Listed entity on 30.12.2022 On the Gompany has made request to BSE and Called the meeting of Board of Unlisted material subsidiaries of Listed entity on 30.12.2021 On the Gompany has made request to BSE and Called the Main and				1							
30.12. 2022 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re ments) Regulate ments) Regulati ons, a ended ments) Regulati ons, 2015 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re ments) Regulate ments) Regulate material subsidiaries of Listed entity on 30.12.2022 BSE Fine Delaye fine d of submis Rs.2,7 sion of 7,300 the meeting of Board of India (Inclu (I				1							
Delayed es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati on 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re ended ments) Regulati ons, 2015 Regulati on 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re ended March Salar of the meeting of Board of India (Listing Obligati ons and Disclosu re ended March Salar of Salar o											
Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati ons, 2015 Regulati es and entry on 33 Securiti es and on 33 Delayed BSE Fine Delaye fine of Submiss Rs.2,7 sion of 7,300 the meeting (inclu of Board of India (Listing Obligati ons and Disclosu re ed the period ed material subsidiaries of Listed entity on 30.12.2022 The Company has made request to BSE Ltd for waiver appli cation of Board of June 30, results GST 2021 to within @18 consider and the %) approve the following: a) The Audited Results on Still pending with BSE Ltd. Require ments) Regulati ons, ended for the quarte ons, 2015 March 31, 2021. The March 31, 2021. The Company has made request to BSE Ltd. Refulre period financi sive Director on delay in the submission of Financial Results on approve the following: a) The Audited Still pending with BSE Ltd.											
Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati ons, 2015 Regulati on 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re ed a for the Require ments) Regulati ons, 2015 Regulati ons, 2015 Regulati on 33 Delayed BSE Fine Delaye fine do for Company has made request to BSE er appli of financi sive dinciple (inclu of Board of India (Indiu of Board of India (Indiu of Board of India (Indiu of Board of India of India (Indiu of Board of India of									-		
Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati ons, 2015 Regulati es and Exchang e Board of India (Listing Obligati ons, 2015 Regulati on 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati on 33 Securiti es and Exchang e Bose Fine don 30.12.2022 BSE Fine Delaye for don of submiss Rs.2,7 had called the meeting of Board of India (inclu financi sive of penalty for delay in the submission of results GST 2021 to consider and approve the prescri bed period for the quarter ended for the quarter ons, 2015 March March Company had called the meeting of Board of Director on all of June 30, results GST 2021 to consider and approve the following: a) The waiver application still pending with BSE Ltd. Listed entity on 30.12.2022 The Company had called the meeting of Board of Director on all of June 30, results GST 2021 to consider and approve the following: a) The waiver application still pending with BSE Ltd. Results (Standalone and March Composition and Consolidate Consoli											
Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati on 33 Securiti es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati on 33 Securiti es and submiss submiss submiss Rs.2,7 had called the meeting of penalty for delay in the submission of financi sive Director on delay in the submission of results GST 2021 to consider and the %) approve the following: a) The waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application still pending with BSE Ltd. Results (Standalone and March Consolidate C										subsidiaries of	
Securiti es and on 33 submiss ion of Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Securiti es and on 33 submiss ion of the Samble submiss ion of the Gompany submiss ion of the Gompany submiss ion of the submission of the financia al of June 30, results GST 2021 to Financial prescrib bed prescrib bed prescrib for the quarter ons, 2015 March Standalone and March Consolidate Securiti es and on 33 submiss ion of the down approve the following: and the consider and prescrib still pending with BSE Ltd. The Company has made waiv request to BSE er application of penalty for delay in the notation of penalty for delay in the notation approve the following: and approve the quarter submission of penalty for delay in the notation of penalty for delay in the notation approve the following: and approve the quarter submission of still pending with BSE Ltd. The Company has made waiv request to BSE er application still for waiver application application still pending with BSE Ltd.										Listed entity	
es and Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati on 33 Submiss submis submis Rs.2,7 had called request to BSE er appli of Board of financia the following: approve the Regulati ons, 2015 Regulati on 33 Submiss submis Rs.2,7 had called request to BSE er appli of penalty for delay in the normal of June 30, submission of still pending within all of June 30, submission of still pending within the prescri bed approve the following: a) The waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application still pending with BSE Ltd. Results on 33 The Waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application application still pending with BSE Ltd. Results on 30 The waiver application still pending with BSE Ltd. Results on 27.08.2021. The waiver application application application and Consolidate a											
Exchang e Board of India (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Exchang e Board of India (Listing Obligati of Solution on and Disclosu re ed Require ments) Regulati ons, 2015 Exchang e Board of the sion of 7,300 the meeting of Board of the submission of financi sive dinciple of Board of the submission of still pending within al of June 30, submission of results GST 2021 to submission of still pending within approve the following: a) The waiver application still pending with BSE Ltd. Exchang e Board of the meeting of Board of Director on delay in the submission of still pend ing within approve the following: a) The waiver application still pending with BSE Ltd. Exchang e Board of the meeting of penalty for delay in the submission of still pend ing within approve the following: a) The waiver application still pending with BSE Ltd.	3	i			BSE	Fine			1		The
the financia (Listing Obligati ons and Disclosu re Require ments) Regulati ons, 2015 Regulati ons, 2015 March 2015 March 2015 March of India (Listing of India (Listing of India (Listing Obligati of India (India			on 33	1							
of India (Listing Obligati Ons and Disclosu re Require ments) Regulati Ons, 2015 Nah & 2015 Obligati Obligati Ons and Disclosu re ed the Regulati Ons, 2015 Nah & 2015 Obligati Obligati Ons and Disclosu re ed the Regulati Ons, 2015 Nah & 2015 Obligati Obligati Of Board of Director on delay in the submission of still pend on still pending with BSE Ltd. Obligati Obligati Of Board of Director on delay in the submission of still pending on still pen		- 1									
(Listing Obligati Obl											
Obligati ons and Disclosu re ed period ments) Regulati ons, 2015 March 2015 Obligati within al of results GST 2021 to prescrib within approve the period for the quarter ons, 2015 Obligati of June 30, submission of Financial pend ments approve the following: The waiver application still pending with BSE Ltd. Audited still pending with BSE Ltd. Of June 30, submission of Financial pend mesults on ing with BSE approve the following: The waiver application still pending with BSE Ltd. Audited still pending with BSE Ltd. Obligati of June 30, submission of Financial pend ing with BSE Ltd. Results on ing with BSE Ltd. The Graph of the Graph of the Consolidate of the Graph		1									1
ons and Disclosu re ed period ments) Regulati ons, 2015 March 2015 the prescrib ed prescrib ed period for the quarter ons, 2015 March 2015 the prescrib within @18 consider and Results on ing with ming approve the following: a) The waiver application still pending with BSE Ltd. The March March Consolidate The March March Consolidate The Compa											1
Disclosu re ed ed period prescrib ed period for the Regulati ons, 2015 March 31, 2021. The within @18 consider and approve the following: a) The waiver application still pending with BSE Ltd. Period for the quarter ended for the quarte The waiver application still pending with BSE Ltd. Name of the period for the quarte and consolidate following: a) The waiver application still pending with BSE Ltd. Name of the period for the quarte and consolidate for the following: a) The waiver application still pending with BSE Ltd.		_	er .	1							
re Require ments) Regulati ons, 2015 The waiver application still pending with BSE Ltd. The March March Consolidate Compa		Disclosu		1							
Require ments) Regulati ons, 2015 Regulati ons, 2015 Require ments) Regulati ons, 2021. The waiver application still pending with BSE Ltd. Period period period for the quarte quarte rended and Consolidate company. Prescri bed a) The waiver application still pending with BSE Ltd. Results (Standalone and Consolidate consolidate consolidate d) of the consolidate consolidate.		re		ed						1	- 1
ments) Regulati ons, 2015 ments) Regulati ons, 2015 ments) For the quarter ended March 31, The March				period			prescri	ŕ		50	1
ons, 2015 ended March 31, r (Standalone 2021. The March March Consolidate Compa				for the			bed		a) The		
2015 March 31, 2021. The Compa	l	_					period		Audited	still pending	
31, 2021. The March Consolidate Compa		1					for the		i i	with BSE Ltd.	
2021. The March Consolidate Compa		2015					quarte				
The March Consolidate											
Compa 31 d) of the							1		ì		
	shah	SA							1		
S No. 10070 28 P. No. 12891 29 Pry Secretary 8				Compa			31,		u) or the		
Thy Secretaria Secreta	No. 1	0070	7.				8				
Ty Secretal .	. 140. 1	2031/8									
	any Set	cretain									

8	ny was	2021.	company for
	require	The	the
	d to	Compa	quarter/year
	submit	ny was	ended 31st
	the	require	March 2021
	audited	d to	b) To
	financia	submit	recommend
	I result	the	a dividend, if
	for the	audite	any for the
	quarter	d	
	ended	1	financial
	March	financi	year ended
	A SECURITION OF THE PROPERTY O	al	31st March
	31,	result	2021.
	2021 on	for the	W.r.t. Notice
	or	quarte	of Board
	before	r	Meeting the
	June 30,	ended	Company
	2021.	March	has
	The	31,	intimated to
	Compa	2021	the BSE Ltd
	ny has	on or	on
	submitt	before	22.06.2021.
	ed	June	However
	audited	30,	due to
	financia	2021.	COVID - 19
	I results	The	pandemic
	for the	Compa	conditions
	quarter	ny has	the meetings
	ended	submit	to be held on
	March	ted	June 30,
	31,	audite	2021 was
	2021 on	d	cancelled.
	August	financi	The
	27,	al	cancellation
	2021	results	of meeting
	1021	for the	with reason
		quarte	
			was also
		r	submitted to
		ended	BSE Limited
		March	on June 29,
		31,	2021.
		2021	Further the
		on	Company
		August	had
		27,	requested
		2021	for
			Extension of
			Time period
shall & A			for
3.		-	
FCS No. 10070 (2)		9	
FCS No. 10070 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0		_	
3			
FCS No. 10070 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0			
4			

						Submission	
						of Financial	
						Results	
	-						
						2020-21 was	
						also	
						submitted to	
						BSE Limited	
						on June 29,	
	10					2021.	ŀ
						Further the	
		1				Company	
						had called	
						the meeting	
						of Board of	
						Director on	
						August 20,	
						2021 to	
						consider and	
						approve the	
						following:	
						a) The	
			2			Audited	
						Financial	
						Results	
						(Standalone	
						and	
					10	Consolidate	
		,				d) of the	
						company for	2
						the	
						quarter/year	
						ended 31st	
I						March 2021	
						b) To	
						recommend	
						a dividend, if	
						any for the	
						financial	1
						year ended	
						31st March	
					1	2021.	
						W.r.t. Notice	
						of Board	
						Meeting the	
						Company	
						has also	
					1	intimated to	
					1	the BSE Ltd	
	h 0	1			1	on little ball blue	
S.She	ASC.	:				011	
Lest,	100 je			10			
E FCS N	lo. 10070 lo. 12891	l		10			
C.P. N	188	Y					
	Secretain	4					
	00						

	Т	T	7	Т		7		7		
								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,		
								August 27,	*	
04	Securiti	Regulati	Delayed	BSE	Fine	Dolove	Fi	2021.		
01	es and	on 33	submiss	DSE	rine	Delaye	Fine	Due to delay	The Company	The
	Exchang	011 33	ion of			d	of Rs.	in	has made	waiv
	e Board		the			submis	1,00,3	declaration	request to BSE	er
	of India		financia			sion of		of audited	Ltd for waiver	appli
	(Listing		1			the	lusive	financial	of penalty for	catio
	Obligati		I results			financi	of GST	result for the	delay in the	n
	ons and		within			al	@ 18	quarter	submission of	still
	Disclosu		the			results	%).	ended	Financial	pend
			prescrib			within		March 31,	Results on	ing
	re		ed			the	8	2021. The	02.09.2021.	with
	Require		period			prescri		unaudited	The waiver	BSE
	ments)		for the			bed		financial	application is	Ltd.
	Regulati		quarter			period		result for the	still pending	
	ons,		ended			for the		quarter	with BSE Ltd.	
	2015		June 30,			quarte		ended June		
			2021.			r		30, 2021 is		
			The			ended		not		
			Compa			June		completed		
			ny was			30,		on time and		
2			require			2021.		the company		
			d to			The		has declared		
			submit			Compa		unaudited		
			the			ny was		financial		
			financia			require		result for the		
			l result			d to		quarter		
in the last			for the			submit		ended June		
	Shah & A	*	quarter			the		30, 2021 on		
/5								-,		

	T -	
ended	financi	September
June 30,	al	2, 2021 with
2021 on	result	delay of 19
or	for the	days.
before	quarte	,
August	r	
14,	ended	
2021.	June	
The	30,	
Compa	2021	
ny has	on or	
submitt	before	
ed	August	, ,
financia	14,	
I result	2021.	
for the	The	
quarter	Compa	
ended	ny has	
June 30,	submit	
2021 on	ted	
Septem	financi	
ber 2,	al	
2021.	result	
	for the	,
	quarte	
	r	
	ended	
	June	
	30,	
	2021	
	1 1	
	on	
	Septe	
	mber	
	2,	
	2021.	

For Mitesh J. Shah & Associates

Company Secretaries

Mitesh Shah Proprietor

FCS No.: 10070 C. P. No.: 12891

Peer Review Certificate No. 1730/2022

FCS No. 10070 C.P. No. 12891

UDIN: F010070F000487140

Date: 29.05.2024 Place: Mumbai

This Report is to be read with our letter of even date which is annexed as 'Annexure A' and forms an integral part of this report.



Annexure A

Our report of even date is to be read along with this letter.

Management's Responsibility Statement

Maintenance of compliance records is the responsibility of the management of the Company. Our responsibility is to express any deviation in such compliances.

Auditor's Responsibility Statement

- ii. I have followed the verification practices and processes as were appropriate to obtain responsible assurance about the correctness of the contents of the records. The verification was done on test basis to ensure that correct facts are reflected in the records. I believe that the processes and practices that I follow provide a responsible basis for my opinion.
- I have not verified the correctness and appropriateness of financial records and books of accounts of the Company.
- Wherever required, I have obtained the management representation about the compliance of laws, rules and regulations and happening of events etc.

Disclaimer

- The compliance of the provisions of SEBI Regulations and other applicable regulations including circulars, guidelines and standards is the responsibility of management. My examination was limited to verification of procedures on test basis.
- The secretarial compliance report is neither an assurance as to the future viability of the Company nor the efficacy or effectiveness with which the management has conducted the affairs of the Company.

For Mitesh J. Shah & Associates

Company Secretaries

Mitesh Shah Proprietor

FCS No.: 10070 C. P. No.: 12891

Peer Review Certificate No. 1730/2022

Date: May 29, 2024 Place: Mumbai