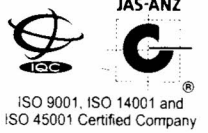




# DHP INDIA LIMITED

Corporate Identity Number (CIN) : L65921WB1991PLC051555



Registered Office : 10 Middleton Row, Kolkata 700 071, India  
Tel : +91(33) 2229-5735, 2229-7995, Fax : +91(33) 2217-2751  
E-mail : info@dhpindia.com

To

Ref : 19(B)(C)/29327

16/04/2021

1) The Secretary

The Calcutta Stock Exchange Ltd. [Securities Code : 14058]  
7, Lyons Range, Kolkata - 700 001.

2) The General Manager /Asst. General Manager - Deptt. Of Corporate Services,  
Bombay Stock Exchange Ltd., [Securities Code : 531306]  
25, P. J. Towers, Dalal Street, Mumbai - 400 001.

Dear Sir,

Re : DHP INDIA LIMITED

Subject : Sending of Annual Secretarial Compliance Report from a Practicing Company Secretary as per Regulation 24A (newly notified by SEBI) of Year ended 31/03/2021

We are sending herewith the Annual Secretarial Compliance Report as per Regulation 24A of SEBI (LODR) Regulations 2015, duly verified and signed by a Practicing Company Secretary for the year ended 31/03/2021 mentioned their UDIN also.

Now, we are sending the attached Annual Secretarial Compliance Report as per Regulation 24A.

Kindly acknowledge the same.

Thanking You,

Place : KOLKATA

Dated : 16/04/2021



FOR DHP INDIA LIMITED

(CA Ashok Kumar Singh)  
Chief Financial Officer

Enclosed : As stated above

# SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

## **ANNUAL SECRETARIAL COMPLIANCE REPORT OF "DHP INDIA LIMITED"** **FOR THE FINANCIAL YEAR ENDED : 31<sup>ST</sup> MARCH, 2021**

To  
The Members  
DHP INDIA LIMITED  
10, Middleton Row,  
Kolkata – 700 071.

We *M/s. Sushil Tiwari & Associates, Practising Companies Secretaries* have examined :-

- (a) All the documents and records made available to us and explanation provided by DHP INDIA LIMITED ("the listed entity"),
- (b) The filing/submission 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 31<sup>st</sup> March, 2021 ("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
- (b) The Securities Contracts (Regulations) 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 **(Not applicable to the Company during the Audit Period)**;
- (c) Securities and Exchange Board of India (Substantial Acquisitions of Shares and Takeovers) Regulations, 2011;
- (d) Securities and Exchange Board of India (Buyback of Securities) Regulations, 2018 **(Not applicable to the Company during the Audit Period)**;

Cont. page 2



# SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

: 2 :

## **SECRETARIAL ANNUAL COMPLIANCE REPORT OF “DHP INDIA LIMITED”** **FOR THE FINANCIAL YEAR ENDED : 31<sup>ST</sup> MARCH, 2021**

- (e) Securities and Exchange Board of India (Share Based Employee Benefit) Regulations, 2014 (Not applicable to the Company during the Audit Period);
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008 (Not applicable to the Company during the Audit Period);
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations, 2013 (Not applicable to the Company during the Audit Period);
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Other Regulations as applicable and circulars/guidelines issued thereunder;
- (j) Securities and Exchange Board of India (Registrar to an Issue and Share Transfer Agents) Regulations, 1993 regarding the Companies Act and dealing with client;
- (k) The Companies Act, 2013 (the Act) and the rules made thereunder;
- (l) The Depositories Act, 1996 and the Regulations and Bye-laws framed thereunder;
- (m) Foreign Exchange Management Act, 1999 and the rules and regulations made thereunder to the extent of Foreign Direct Investment, Overseas Direct Investment and External Commercial Borrowings; and Circulars/ Guidelines issued thereunder;

And based on the above examination. We 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 :-

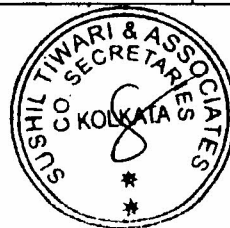
Sr. No.	Compliance Requirement (Regulations/ circulars/guidelines including specific clause)	Deviations	Observations / Remarks of the Practicing Company Secretary
---	----- NIL-----	No deviation	All Regulation Complied-----

- (b) The listed entity has maintained proper records under the provisions of the above Regulations and circulars/guidelines issued thereunder in so far as it appears from 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, debarments, etc.	Observations/remarks of the practicing Company Secretary, if any.
-----	-No Action Taken--	-No violation--	-No action taken etc.-	--All Regulation complied--

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# SUSHIL TIWARI & ASSOCIATES

Company Secretaries

31A, S.P.Mukherjee Road, Kolkata – 700 025. Phone No. (033) 2476-5908 & (033)2455-9891

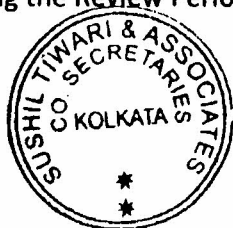
: 3 :

## SECRETARIAL ANNUAL COMPLIANCE REPORT OF "DHP INDIA LIMITED" FOR THE FINANCIAL YEAR ENDED : 31<sup>ST</sup> MARCH, 2021

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

Sr. No.	Observations of the Practicing Company Secretary in the previous reports	Observation made in the secretarial compliance report for the year ended	Action taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity.
-----	-No observations made in any previous year ----	-No observations made in any previous year ----	Not applied	--All Regulation complied--

We hereby confirm that no observations were made in any previous year under secretarial audit report and we also confirm that during the year no action was taken by any regulatory/govt. body against the Company, its promoters, its directors and its managerial personnel etc. Similarly the listed entity have no subsidiary companies. The Company has complied all rules, regulations and directions issued under aforesaid regulations during the Review Period.



Dated : 16/04/2021

UDIN No. : A006199C000107828

For SUSHIL TIWARI & ASSOCIATES  
Company Secretaries

*Sushil Tiwari*

(SUSHIL TIWARI)

Proprietor

Membership No.ACS-6199 &  
Certificate of Practice No.1903