

**Deep Energy**  
Resources Limited

May 30, 2022

To,  
**Corporate Relations Department**  
**Bombay Stock Exchange Limited**  
2<sup>nd</sup> Floor, P.J. Towers,  
Dalal Street,  
Mumbai – 400 001

To,  
**Corporate Relations Department**  
**National Stock Exchange of India Limited**  
Exchange Plaza, Plot No. C/1, G-Block  
Bandra Kurla Complex, Bandra (E),  
Mumbai – 400 051

**Company Code : 532760**

**Symbol: DEEPENR**

Dear Sir/Madam,

**Sub.: Annual Secretarial Compliance Report for the year ended 31<sup>st</sup> March, 2022.**

Pursuant to Regulation 24A of the SEBI (Listing Obligations And Disclosure Requirements) Regulations, 2015, as amended read with SEBI Circular No. CIR/CFD/CMD1/27/2019 dated 8th February, 2019, please find enclosed herewith Annual Secretarial Compliance Report of the Company for the financial year ended on 31<sup>st</sup> March, 2022 issued by M/s. Shilpi Thapar & Associates, Practicing Company Secretaries, Ahmedabad.

You are requested to take the same on your record.

Thanking You,

Yours faithfully,

**For, DEEP ENERGY RESOURCES LIMITED**  
**(Formerly Known as Deep Industries Limited)**

**Dixita Soni**  
**Company Secretary & Compliance Officer**



**Encl: As Above**

**DEEP ENERGY RESOURCES LIMITED**

(Formerly known as Deep Industries Limited)

Regd. Office Address: 12A & 14, Abhishree Corporate Park, Ambli Bopal Road, Ambli, Ahmedabad- 380 058

Tel -02717-298510 Fax :+91 2717 298520 E-Mail- info@deepenergy.ooo Website: www.deepenergy.ooo

CIN : L63090GJ1991PLC014833



Secretarial compliance report  
of Deep Energy Resources Limited  
(earlier known as Deep Industries Limited)  
CIN No. L63090GJ1991PLC014833

Registered Office: 12A & 14, Abhishree Corporate Park, Ambli Bopal Road, Ambli,  
Ahmedabad-380058.

For the Financial year ended 31st March, 2022

[As per the regulation 24(A) of SEBI (LODR) Regulations, 2015 as amended from time to time]

I, CS Shilpi Thapar of M/s. Shilpi Thapar & Associates, Company Secretaries have examined:

- a) all the documents and records made available to me and explanation provided by Deep Energy Resources Limited (earlier known as "Deep Industries Limited") ("the listed entity")
- 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 on 31<sup>st</sup> March, 2022 ("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 (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 to the extent applicable;
- 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 to the listed entity during the review period);
- e) Securities and Exchange Board of India (Share Based Employee Benefits) Regulations, 2014 to the extent if applicable;
- f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008(Not applicable during the review period);
- g) Securities and Exchange Board of India(Issue and Listing of Non-Convertible and Redeemable Preference Shares) Regulations,2013; (Not applicable to the listed entity during the review period);
- h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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

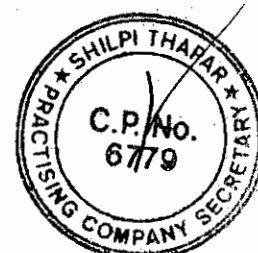
- a) The listed entity has complied with the provisions of the above Regulations and circulars/ guidelines issued thereunder.



CIN: L63090GJ1991PLC014833

- 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 my 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 there under:

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.
1	SEBI Order No. WTM/SKM/EFD-DRA-III/ 23/2019-20 dated 30th September, 2019 under sections 11(1), 11(4) and 11B of The Securities and Exchange Board of India Act, 1992 against Mr. Rupesh Savla, Managing Director of the Listed entity.	Alleged Violation of provision of sections 12A(d) & (e) of the SEBI Act, 1992 & Regulation 4(1) of the SEBI (PIT) Regulations, 2015.	Directions in the Order:- (a) disgorge an amount of gain as computed in Interim order and lying deposited in escrow account; (b) refrain from accessing the securities market for a period of six months.	As informed, Appeal by Mr. Rupesh Savla, Managing Director (who resigned on 10.06.2021) was filed against the SEBI order dated 30.09.2019 with Securities Appellate Tribunal (SAT) which is dismissed and as confirmed by management of listed entity, Hon'ble Supreme Court has already granted stay against the same.



(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 on 31.03.2019	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	-----	Regulation 44 (3) of SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015- Details regarding voting results were not submitted within 48 Hours of the Conclusion of the Court Convened Meeting of the Equity Shareholders dated 30.10.2018.	Complied by submitting Scrutinizer Report after 48 hours of the conclusion of the Court Convened Meeting of the Equity Shareholders dated 30.10.2018.	Complied.



CIN: L63090GJ1991PLC014833

Sr. No	Observations of the Practicing Company Secretary in the previous reports	Observations made in the secretarial compliance report for the year ended on 31.03.2021	Actions taken by the listed entity, if any	Comments of the Practicing Company Secretary on the actions taken by the listed entity
1.	-----	<p>The disclosure required under Reg.30(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations for the F.Y.2020-21 is required to be submitted within 7 working days i.e.8<sup>th</sup> April,2020 as per Reg.30(3) of Regulations.</p> <p>Due to Covid-19 pandemic, relaxation provided by Securities and Exchange Board of India vide circular no. SEBI/HO/CFD/DCRI/CIR/P/2020/49 dated 27<sup>th</sup> March,2020,the due date got extended for filing disclosures, in terms of Regulations 30(1), 30(2) and 31(4) of the SAST Regulations for the financial year ending March 31, 2020 to 1<sup>st</sup> June,2020. The said disclosure was not submitted to the BSE and NSE within extended due date.</p>	<p>The disclosure required under Reg. 30(2) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) was submitted to BSE and NSE on 2<sup>nd</sup> June,2020.</p>	Complied.
2.	-----	<p>The disclosure of 31(4) of Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations is required to be submitted within 7</p>	<p>The disclosure under regulation 31(4) of</p>	Complied.

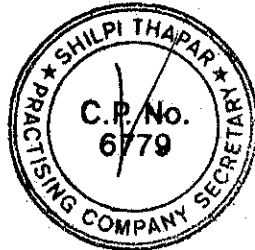


CIN: L63090GJ1991PLC014833

	working days i.e. 8 <sup>th</sup> April, 2020. Due to Covid-19 pandemic, relaxation provided by Securities and Exchange Board of India by circular no. SEBI/HO/CFD/DCRI/CIR/P/2020/49 dated 27 <sup>th</sup> March, 2020, the due date got extended for filing disclosures, in terms of Regulations 30(1), 30(2) and 31(4) of the SAST Regulations for the financial year ending March 31, 2020 to 1 <sup>st</sup> June, 2020. The said disclosure was not submitted to the BSE and NSE within extended due date.	Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) was submitted to BSE and NSE on 2 <sup>nd</sup> June, 2020.	
--	---	--	--

## Note:

- The reporting of clause 6(A) and 6(B) of the circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 issued by the Securities and Exchange Board of India on "Resignation of statutory auditors from listed entities and their material subsidiaries" is not applicable during the Review Period.
- The audit was conducted by examining relevant records accessed through or received by electronic mode and physical records held during the year under review due to COVID-19 pandemic. However, necessary confirmation for the authenticity of the records received has been provided by the listed entity.



Signature:

Place: Ahmedabad

Date: 26.05.2022

Name of PCS: CS Dr(h.c) Shilpi Thapar

FCS No.: 5492

CP No.: 6779

P.R. NO. 1828/2022

UDIN: F005492D000392802