

ಎಚ್ಎಂಟೆ ಲಿಮಿಟೆಡ್

(ಭಾರತ ಸರ್ಕಾರದ ಉದ್ಯಮ) ಎಚ್ಎಂಟಿ ಭವನ, #59, ಬಳ್ಳಾರಿ ರಸ್ತೆ, ಬೆಂಗಳೂರು - 560 032, ಭಾರತ ದೂರವಾಣೆ: 91-80-23330333 ವೆಬ್ಸ್ರೆಟ್ : www.hmtindia.com

एच एम टी लिमिटेड

(भारत सरकार का उपक्रम) एच एम टी भवन, # 59. बेल्लारी रोड बेंगलुरु - 560 032, भारत फोर्ने : 91-80-23330333 फैक्स : 91-80-23339111 ई- मेल् : cho@hmtindia.com

वेब साईट : www.hmtindia.com

HMT LIMITED (A Govt. of India Undertaking) HMT BHAVAN # 59, Bellary Road, Bengaluru - 560 032, INDIA Phone: 91-80-23330333 Fax: 91-80-23339111 E-mail: cho@hmtindia.com

Website: www.hmtindia.com

एसईसीएल.S-5 Secl.S-5

बीएसई लिमिटेड **BSE Limited** फिरोज जीजीभोय टावर्स Phiroze Jeejeebhoy Towers 25वीं मंजिल, दलाल स्टीट 25th Floor, Dalal Street मंबई - 400 001 Mumbai - 400 001 स्क्रिप कोड: 500191 Scrip Code: 500191

30 मई, 2024 30th May, 2024

नेशनल स्टॉक एक्सचेंज ऑफ इंडिया लिमिटेड National Stock Exchange of India Limited "एक्सचेंज प्लाजा" "Exchange Plaza" बांद्रा-कुर्ला कॉम्प्लेक्स Bandra-Kurla Complex बांद्रा (पूर्व), मुंबई- 400 051 Bandra (E), Mumbai - 400 051 स्क्रिप प्रतीकः HMT Scrip Symbol: HMT

प्रिय महोदय/ महोदया. Dear Sir/ Madam.

विषय: 31 मार्च, 2024 को समाप्त वितीय वर्ष के लिए वार्षिक सचिवीय अनुपालन रिपोर्ट

Sub: Annual Secretarial Compliance Report for the financial year ended 31st March,

सेबी (एलओडीआर) विनियम, 2015 के विनियम 24ए के अनुसार, कृपया 31 मार्च, 2024 को समाप्त वितीय वर्ष के लिए वार्षिक सचिवीय अनुपालन रिपोर्ट संलग्न करें।

Pursuant to Regulation 24A of SEBI (LODR) Regulations, 2015, please find enclosed herewith the Annual Secretarial Compliance Report for the financial year ended 31st March, 2024.

सूचना व अभिलेख हेत्। This is for your information and records.

> भवदीय/ Yours faithfully एचएमटी लिमिटेड के लिए/ For HMT Limited

(किशोर कुमार एस) / (KISHOR KUMAR S) प्रबंधक (कंपनी सचिव)/ Manager (Company Secretary)

संलग्न: ऊपरोक्त Encl: As above



Secretarial Compliance Report of H.M.T. LIMITED (CIN: L29230KA1953GOI000748) for the financial year ended 31st March 2024

- I, D Venkateswarlu, Practicing Company Secretary have examined:
- (a) all the documents and records made available to us and explanation provided by M/s H.M.T. LIMITED (CIN: L29230KA1953GOI000748) ("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 Report, for the financial year ended 31st March 2024 ("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) ("LODR") Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018;



- (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; **No transaction observed during the period under review and hence not applicable.**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **No transaction observed during the period under review and hence not applicable.**
- (f) Securities and Exchange Board of India (Issue and Listing of Debt Securities) Regulations, 2008; **No transaction observed during the period under review and hence not applicable.**
- (g) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations,2021; **No transaction observed during the period under review and hence not applicable.**
- (h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- (i) Securities and Exchange Board of India (Depositories and Participants) Regulations, 2018
- (j) Securities and Exchange Board of India (Registrars to an Issue and Share transfer agents) Regulations, 1993 and
- (k) Circulars/guidelines issued thereunder;



Practicing Company Secretary

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, except in respect of matters specified below:

Sl No	_	Regulation / Circular No.	Deviatio ns	Action Takenby	Type of Action	Details of Violation	Fine Amount	Observations/Rema rks of the Practicing Company Secretary	Management Response	Remar ks
1	Regulation 17(1) of LODR: Composition of the Board including appointment of independent woman director	LÒDR	Non-complian ce with the requirem ents pertainin g to Composit ion of Board of Directors	NSE	Impositio n of fine / Penalty		imposed penalties of: Rs. 5,36,900 /-each for the quarter ended 30.06.2023; Rs. 5,42,800 /-each for the quarter ended 30.09.2023; Rs. 5,42,800 /-	provisions of Regulation 17 (1) of LODR with respect to	pursuing with Ministry of Heavy Industries for appointment of requisite number of Independent Directors including independent woman director on the Board.	



Practicing Company Secretary

2.	Regulation 17(2A) of	Regulation 17(2A) of	Non- complian	BSE & NSE	Impositio n of fine /				The Company is regularly pursuing with Ministry of Heavy Industries	NA
	LODR:	LODR	ce with		Penalty	the provisions of			for appointment of requisite	
	Quorum of		the		,	Regulation 17 (2A)			number of Independent Directors	
	Board meetings		requirem				·	LODR with respect to		
			ents			respect to Quorum	1	Quorum of Board		
			pertainin						As on 01.04.2023, Board of	
			g to			held during the FY 2023-24			Directors of the Company consists of only three Directors i.e.,	
			Quorum of Board			2023-24	Rs. 35,400/- each for the quarter		of only three Directors i.e., Chairman and Managing Director	
			meetings				ended 30.09.2023;		(Addl. Charge), Two Government	
			meetings				enaca 30.07.2023,		Nominee Directors/ Non-	
							Rs. 11,800/- each		Executive Directors and on	
							for the quarter		25.08.2023 Director (Finance)	
							ended 31.12.2023;		(Addl. Charge) has been appointed.	
							and		The Board ensures the presence of	
							D 11.000/ 1		one-third of its total strength or	
							Rs. 11,800/- each		three directors, whichever is	
							for the quarter ended 31.03.2024		higher, as quorum until the appointment of at least one	
							clided 51.05.2024		Independent Director.	
									Independent Director.	
3.	Regulation	Regulation	Non-	BSE &	Impositio	The Company has	BSE & NSE has	The Company has not	The Company is regularly	NA
	18(1) & 18 (2)	18(1) & 18	complianc	NSE for	n of fine /	not complied with	imposed penalties	complied with the	pursuing with Ministry of Heavy	
	(b) of LODR:				Penalty	the provisions of			Industries for appointment of	
	Constitution of		requireme			Regulation 18 (1) &			requisite number of Independent	
	Audit		nts	Regulatio		18 (2) (b) of LODR	Rs. 2,14,760/- each	(2) (b) of LODR with	Directors on the Board.	



Practicing Company Secretary

Committee pertain	ning n 18 (1) of				As on 01.04.2023, Board of	
to	LODR			of Audit Committee		
Consti	tutio	Audit Committee,		Chairman of	consists of only three Directors	
n of	audit	Chairman of	Rs. 2,17,120/- each	Committee & quorum	i.e., Chairman and Managing	
comm	ittee,	Committee &	for the quarter	of the Audit	Director (Addl. Charge), Two	
Chairr	nan	Quorum of Audit	ended 30.09.2023	Committee meeting,	Government Nominee Directors/	
of		Committee meeting		during the FY 2023-	Non-Executive Directors and on	
Comm	nittee	held during the FY	Rs. 2,17,120/- each	24	25.08.2023 Director (Finance)	
& qu	orum		for the quarter		(Addl. Charge) has been	
of	the		ended 31.12.2023;		appointed.	
Comm	nittee		and			
					With the available Executive/	
			Rs. 2,14,760/- each		Non-Executive Directors, the	
			for the quarter		Audit Committee has been	
			ended 31.03.2024		reconstituted and appointed	
					Government Nominee Directors /	
					Non-Executive Director as	
			for violation of		Chairman of the Committee until	
			Regulation 18 (1)		the appointment of Independent	
			of LODR		Directors.	
					The Committee ensures the	
					presence of two members or one	
					third of the members of audit	
					committee, whichever is higher,	
					as quorum for meetings until the	
					appointment of Independent	
					Directors.	
4. Regulation Regulation No.	n- BSE & Imposition	The Company has	BSE & NSE has	The Company has not	The Company is regularly	NA
19(1)/19(2) of $19(1)/$ comp					pursuing with Ministry of Heavy	
LODR: 19(2) of e with		_			Industries for appointment of	
Constitution of LODR requir	1	Regulation 19(1)/		*	requisite number of Independent	



					Г	
Nomination	nts	19(2) of LODR with	Rs. 2,14,760/-	` ′	Directors on the Board.	
and	pertaining	respect to	each for the	respect to		
Remuneration	to	Constitution of	quarter ended		As on 01.04.2023, Board of	
Committee	Constitutio	Nomination and	30.06.2023;		Directors of the Company	
	n of	Remuneration		Remuneration	consists of only three Directors	
	Nominatio	Committee during	Rs. 2,17,120/-	Committee during the	i.e., Chairman and Managing	
	n and	the FY 2023-24.	each for the	FY 2023-24.	Director (Addl. Charge), Two	
	Remunerat		quarter ended		Government Nominee Directors/	
	ion		30.09.2023;		Non-Executive Directors and on	
	Committee				25.08.2023 Director (Finance)	
			Rs. 2,17,120/-		(Addl. Charge) has been	
			each for the		appointed.	
			quarter ended			
			31.12.2023;		With the available Executive/	
			and		Non-Executive Directors, the	
					Nomination and Remuneration	
			Rs. 2,14,760/-		Committee has been reconstituted	
			each for the		and appointed Government	
			quarter ended		Nominee Directors / Non-	
			31.03.2024		Executive Director as Chairman	
					of the Committee until the	
					appointment of Independent	
					Directors.	
					The Committee ensures the	
					presence of two members or one	
					third of the members of the	
					committee, whichever is greater,	
					as quorum for meetings until the	
					appointment of at least one	
					Independent Director.	



Practicing Company Secretary

	L	I			I				r		
	Regulation	Regulation	Non-					BSE & NSE has		The Company is regularly	NA
	, , , , ,			NSE	n of fine /					pursuing with Ministry of Heavy	
	LODR:	of LODR	e with the		Penalty	the provisions	of	of:	_	Industries for appointment of	
	Constitution of		requireme			Regulation			Regulation	requisite number of Independent	
	Stakeholders		nts			20(2)/(2A)	of	Rs. 2,14,760/-	20(2)/(2A) of LODR	Directors on the Board.	
	Relationship		pertaining			LODR with res	pect	each for the	with respect to		
	Committee		to			to Constitution	of	quarter ended	Constitution of	As on 01.04.2023, Board of	
			Constitutio			Stakeholders		30.06.2023;	Stakeholders	Directors of the Company	
			n of			Relationship			Relationship	consists of only three Directors	
			Stakeholde			Committee du	ıring	Rs. 2,17,120/-		i.e., Chairman and Managing	
			rs			the FY 2023-24		each for the	FY 2023-24	Director (Addl. Charge), Two	
			Relationsh					quarter ended		Government Nominee Directors/	
			ip					30.09.2023;		Non-Executive Directors and on	
			Committee					·		25.08.2023 Director (Finance)	
								Rs. 2,17,120/-		(Addl. Charge) has been	
								each for the		appointed.	
								quarter ended		11	
								31.12.2023;		With the available Executive/	
								and		Non-Executive Directors, the	
										Stakeholders Relationship	
								Rs. 2,14,760/-		Committee has been reconstituted	
								each for the		until the appointment of	
								quarter ended		Independent Directors.	
								31.03.2024		mucp endem 2 meeters.	
								31.00.2021			
6	Regulation	Regulation	Non-	BSE &	Impositio	The Company	has	BSE & NSE has	The Company has not	The Company is regularly	NA
	21(2) of		complianc		n of fine /			imposed penalties		pursuing with Ministry of Heavy	- 1
	LODR:	LODR	e with the		Penalty	the provisions				Industries for appointment of	
	Constitution of		requireme			Regulation 21(2				requisite number of Independent	
	Risk		nts			LODR with res				Directors on the Board.	
	Management		pertaining			to Constitution		1 0 4	Constitution of Risk		
	Committee		to			is committed	. 01	quarter ended	Management Management	With the available Executive/	
								30.06.2023;		In the dy diffuele Encounty of	



Practicing Company Secretary

	1		I		I	D' 1 M	I	0 11 1	N E (B) ((G)	I
			Constitutio			Risk Management	Rs. 2,17,120/-		Non-Executive Directors/ Senior	
			n of Risk			Committee during the FY 2023-	l ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' ' '	FY 2023-24	Management Personnel, the Risk	
			Manageme			24.	quarter ended		Management Committee has been	
			nt Committee			24.	30.09.2023;		reconstituted until the	
			Committee				30.07.2023,		appointment of Independent Directors.	
							Rs. 2,17,120/-		Directors.	
							each for the			
							quarter ended			
							31.12.2023;			
							and			
							Rs. 2,14,760/-			
							each for the			
							quarter ended			
							31.03.2024			
7	Regulation 33	Regulation	Non-	BSE &	Impositio	The Company has	BSE & NSE	The Company has not	Reason for delay in submission	NA
		33 of SEBI				not complied with			of audited financial results for	
	(LODR)	(LODR)	e with the	TIBL	Penalty	the provisions of			FY2022-23:	
	Regulations:	Regulation			1 charty	Regulation 33 of		1	HMT Limited & its Subsidiaries	
	Submission of		nts			SEBI (LODR)	, - ,	U	have units across India in	
	Financial		pertaining			Regulations with		` ` '	Bangalore, Pinjore, Aurangabad,	
	Results to the		to			respect to		respect to submission	Hyderabad, Kalamassery and	
	Stock		submissio			submission of		of Financial Results	Ajmer. The Audit at various units	
	Exchanges		n of			Financial Results		to the Stock	were progressing and the	
			Financial			to the Stock		Exchanges within	Company made its best efforts to	
			Results to			Exchanges within			complete and submitted the	
			the Stock			prescribed		with a delay of 51	financial results to the exchanges	
			Exchanges			time limit with a		days.	on 20 th July, 2023.	
			within			delay of 51 days.				
1			prescribed							
1			time limit							



8	Regulation	Regulation	Non-	NA	NA	Pursuant	to	NA	The Company	has not	The	Company	is	regularly	NA
	24(1) of	24(1) of	complianc			Regulation	24(1)		complied wit	th the	pursu	ing with M	inistry	of Heavy	
	LODR: Having	LODR	e with the			of SEBI (L	ODR)		provisions	of	Indus	stries for app	ointm	ent of one	
	atleast one		requireme			Regulations,	2015,		Regulation 24	4(1) of	Indep	endent Dir	ectors	on the	
	Independent		nts			at least	one		LODR with res	spect to	Board	d of its u	nlisted	material	
	Director of the		pertaining			Independent			Having atleas	st one	subsi	diary.			
	listed entity on		to Having			Director of	the		Independent I	Director					
	the Board of its		atleast one			listed entity	shall		of the listed en	ntity on					
	unlisted		Independe			be on the Bo	ard of		the Board	of its					
	material		nt Director			its ur	nlisted		unlisted r	material					
	subsidiary		of the			material			subsidiary						
			listed			subsidiary.									
			entity on												
			the Board												
			of its												
			unlisted												
			material												
			subsidiary												

^{***}The amount of penalty is based on notice dated 30.06.2023 for non-compliance communicated by exchange.

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

Sr	Observations/ Remarks of the	Observations made	Compliance	Details of violation	Remedial actions,	Comments of the
No	Practicing Company Secretary in	in the secretarial	Requirement	/	if any, taken by the	PCS on the actions
	the previous reports) (PCS)	compliance report	(Regulations/circulars/	Deviations and	listed entity	taken by the listed
		for the year ended	guidelines including	actions taken /		entity
			specific clause)	penalty imposed, if		
				any, on the listed		
				entity		
1.	Regulation 17(1) of LODR:	31.03.2023	Regulation 17(1) of	The Company has	The Company is	I have verified the
	Composition of the Board		LODR: Composition	not complied with	regularly pursuing	communications sent
	including appointment of		of the Board including	the provisions of	with Ministry of	by the Company to



Practicing Company Secretary

independent woman director	appointment	of	Regulation 17 (1) of	Heavy Industries for	the Ministry of
independent woman director	independent	woman	LODR with respect	appointment of	Heavy Industries in
	director	,, Olliuli	to Composition of	requisite number of	this regard.
	director		Board of Directors	Independent	Response from the
			of the Company	Directors including	Ministry in this
			{for not having	independent woman	regard is awaited.
			sufficient	director on the	regard is awaited.
			independent	Board.	
			directors including	Doard.	
			appointment of		
			independent woman		
			director on the		
			Board during the		
			FY 2022-23.}		
			1 1 2022-23.5		
			BSE & NSE has		
			imposed penalties		
			of:		
			or.		
			Rs. 2,59,600 /- each		
			for the quarter		
			ended 30.06.2022;		
			chaca 50.00.2022,		
			Rs. 5,42,800 /- each		
			for the quarter		
			ended 30.09.2022;		
			ciided 30.07.2022,		
			Rs. 5,42,800 /- each		
			for the quarter		
			ended 31.12.2022;		
			and		



				Rs. 5,31,000/- each for the quarter ended 31.03.2023		
2.	Regulation 17(2A) of LODR: Quorum of Board Meetings	31.03.2023	Regulation 17(2A) of LODR: Quorum of Board Meetings	The Company has not complied with the provisions of Regulation 17 (2A) of LODR with respect to Quorum of Board meetings held w.e.f. 27th January 2023. BSE & NSE has imposed penalties of: Rs. 23,600/- each for the quarter ended 31.03.2023	The Company is regularly pursuing with Ministry of Heavy Industries for appointment of requisite number of Independent Directors on the Board and ensure the quorum.	I have verified the communications sent by the Company to the Ministry of Heavy Industries in this regard. Response from the Ministry in this regard is awaited.
3.	Regulation 18(1) & 18 (2) (b) of LODR: Constitution of Audit Committee	31.03.2023	Regulation 18(1) & 18 (2) (b) of LODR: Constitution of Audit Committee	The Company has not complied with the provisions of Regulation 18 (1) & 18 (2) (b) of LODR with respect to constitution of Audit Committee, Chairman of Committee & Quorum w.e.f. 27 th	with Ministry of Heavy Industries for appointment of	I have verified the communications sent by the Company to the Ministry of Heavy Industries in this regard. Response from the Ministry in this regard is awaited.



Practicing Company Secretary

				January 2023.	With the available	
					Executive/ Non-	
				BSE & NSE has	Executive Directors,	
				imposed penalties	the Audit Committee	
				of:	has been	
					reconstituted until	
				Rs. 151,040/- each		
				for the quarter ended		
				31.03.2023 for	Directors.	
				violation of		
				Regulation 18 (1) of		
				LODR		
4	Regulation 19(1)/ 19(2) of LODR:	31.03.2023	Regulation 19(1)/ 19(2)	The Company has		I have verified the
	Constitution of Nomination and		of LODR: Constitution	not complied with	regularly pursuing	communications sent
	Remuneration Committee		of Nomination and	the provisions of	with Ministry of	by the Company to
			Remuneration	Regulation 19(1)/	Heavy Industries for	the Ministry of
			Committee	19(2) of LODR	appointment of	Heavy Industries in
				with respect to	requisite number of	this regard.
				Constitution of	Independent	Response from the
				Nomination and	Directors on the	Ministry in this
				Remuneration	Board.	regard is awaited.
				Committee during		
				the 1 st , 2 nd & 4 th		
				Quarter of the FY	Executive/ Non-	
				2022-23.	Executive Directors,	
				DOE 0 NOE 1	the Nomination and	
				BSE & NSE has	Remuneration	
				imposed penalties	Committee has been	
				of:	reconstituted until	
					the appointment of	



Practicing Company Secretary

				Rs. 4,27,160 /- each for the quarter ended 30.06.2022; Rs. 96,760 /- each for the quarter ended 30.09.2022; and Rs. 151,040/- each for the quarter ended 31.03.2023	1	
5	Regulation 20(2A) of LODR: Constitution of Stakeholders Relationship Committee	31.03.2023	Regulation 20(2A) of LODR: Constitution of Stakeholders Relationship Committee	The Company has not complied with the provisions of Regulation 20(2A) of LODR with respect to Constitution of Stakeholders Relationship Committee w.e.f. 27th January 2023	with Ministry of Heavy Industries for appointment of requisite number of	I have verified the communications sent by the Company to the Ministry of Heavy Industries in this regard. Response from the Ministry in this regard is awaited.



					Independent Directors.	
6.	Regulation 21(2) of LODR: Constitution of Risk Management Committee	31.03.2023	Regulation 21(2) of LODR: Constitution of Risk Management Committee	The Company has not complied with the provisions of Regulation 21(2) of LODR with respect to Constitution of Risk Management w.e.f. after 27th January 2023. BSE & NSE has imposed penalties of Rs. 212,400/- & Rs. 151,040/- respectively for the quarter ended 31.03.2023	Independent Directors on the Board. With the available Executive/ Non- Executive Directors/ Senior Management Personnel, the Risk	I have verified the communications sent by the Company to the Ministry of Heavy Industries in this regard. Response from the Ministry in this regard is awaited.
7.	Regulation 33 of LODR: submission of Financial Results to the Stock Exchanges	31.03.2023	Regulation 33 of LODR: submission of Financial Results to the Stock Exchanges	The Company has not complied with the provisions of Regulation 33 of LODR with respect to submission of Audited Financial	The Company is making it's best efforts to submit the financial results to the exchanges within the prescribed time	With the available resources and support, the Company is making it's best efforts to submit the financial



Practicing Company Secretary



Practicing Company Secretary

I. I hereby report that, during the review period the compliance status of the listed entity with the following requirements:

SI 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).	Yes	-
2.	 Adoption and timely updation of the Policies: 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	-
3.	 Maintenance and disclosures on Website: 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	-



4.	Disqualification of Director:		
	None of the Director(s) of the listed entity is / are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	-
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: a. Identification of material subsidiary companies	Yes	-
	b. Disclosure requirement of material as well as other subsidiaries		
6.	Preservation of Documents: The listed entity is preserving and maintaining records as prescribed under SEBI Regulations and disposal of records as per Policy of Preservation of Documentsand Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	-
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committeesat the start of every financial year / during the financial year as prescribed in SEBI Regulations.	NA	The Company has stated that the Directors of the Company are appointed / nominated by the Government of India and the performance evaluation is done by Government of India, being appointing authority. Further, as per notification dated 05 th June 2015 issued by the Ministry of Corporate Affairs, Government of India, Government Companies are exempt from complying with the provisions with respect to performance evaluation of the Board and



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			its Committees, if the performance evaluation of directors is done by the Ministry which is administratively incharge of the Company.
8.	Related Party Transactions:		
	(a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or	Yes	-
	(b) In case no prior approval obtained, the listed entity shall provide detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the audit committee.	NA	NA
9.	Disclosure of events or information: 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.	Yes	-
10.	Prohibition of Insider Trading: The listed entity is in compliance with Regulation 3(5) &3(6) SEBI (Prohibition of Insider Trading) Regulations, 2015.	Yes	-



11.	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	As mentioned in Table (a) above
	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 (or) The actions taken against the listed entity/ its promoters/ directors/ subsidiaries either by SEBI or by Stock Exchanges are specified in the last column.		
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.	NA	No such resignation of statutory auditors during the FY 2023-24
13.	Additional Non-compliances, if any: Any additional non-compliance observed for any SEBIregulation / circular / guidance note etc. except as reported above.	No	No additional non-compliance observed for any SEBI regulation / circular / guidance note etc.



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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.
- Our responsibility is to report 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 financial records and books of account of the listed entity.
- This report is solely for the intended purpose of compliance in terms of Regulation 24A (2) of the SEBI (LODR) 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.

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Date: 2024.05.29 19:48:20

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UDIN: F008554F000485129

PR No: 1617 / 2021

Place: Bengaluru **Date**: 29th May 2024