

JIK INDUSTRIES LIMITED

Date: 30th May 2024

To,
Bombay Stock Exchange Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai – 400001

National Stock Exchange of India Ltd
Exchange Plaza, BKC,
Bandra- Kurla Complex,
Bandra (East), Mumbai-400 051

Scrip Code: 511618
Through BSE Listing Centre

Symbol: JIKIND
Through NEAPS Portal

Subject: Annual Secretarial Compliance Report for the Financial Year ended March 31, 2024

Dear Sir/Ma'am,

Pursuant to provisions of Regulation 24A of SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015, SEBI Circular No. CIR/CFD/CMD1/27/2019 dated February 8, 2019, please find enclosed herewith the Annual Secretarial Compliance Report of JIK Industries Limited issued by M/s. D Maurya & Associates, Company Secretaries, for the Financial Year ended March 31, 2024.

Please take the above information on record.

FOR JIK INDUSTRIES LIMITED

Mrs. Mohini Sawant
Company Secretary & Compliance Officer
Membership No: A49186
Place: Thane



D MAURYA & ASSOCIATES
Practicing Company Secretary

Secretarial Compliance Report of
JIK Industries Limited
for the financial year ended 31st March 2024

I/We, D Maurya & Associates have examined:

- (a) all the documents and records made available to us and explanation provided by **JIK 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 report,

for the financial year ended 31st March 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 SEBI;

The specific Regulations, whose provisions and the circulars/ guidelines issued thereunder, have been examined, include:

- (a) Securities and Exchange Board of India (LODR) Regulations, 2015;
- (b) Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018; **(Not Applicable to the Company during the review period)**
- (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 Company during the review period)**
- (e) Securities and Exchange Board of India (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; **(Not Applicable to the Company during the review period)**
- (f) Securities and Exchange Board of India (Issue and Listing of Non-Convertible Securities) Regulations, 2021; **(Not Applicable to the Company during the review period)**
- (g) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; and circulars/ guidelines issued thereunder; to the extent applicable to this company;

III) The Depositories Act, 1996 and the Regulations and by-laws framed thereunder;



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I further affirm on the basis of the information received and examination of various documents as required by the circulars issued by Stock Exchanges from time to time as follows:

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	None
2.	Adoption and timely updation of the Policies: <ul style="list-style-type: none">All applicable policies under SEBI Regulations are adopted with the approval of board of directors of the listed entitiesAll 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 Yes	None
3.	Maintenance and disclosures on Website: <ul style="list-style-type: none">The Listed entity is maintaining a functional websiteTimely dissemination of the documents/ information under a separate section on the websiteWeb-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 Yes Yes	None
4.	Disqualification of Director: None of the Director(s) of the Company is/are disqualified under Section 164 of Companies Act, 2013 as confirmed by the listed entity.	Yes	None
5.	Details related to Subsidiaries of listed entities have been examined w.r.t.: (a) Identification of material subsidiary companies (b) Disclosure requirement of material as well as other subsidiaries	Yes	None
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 Documents and Archival policy prescribed under SEBI LODR Regulations, 2015.	Yes	None
7.	Performance Evaluation: The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year/during the financial year as prescribed in SEBI Regulations.	Yes	None
8.	Related Party Transactions: (a) The listed entity has obtained prior approval of Audit Committee for all related party transactions; or (b) The listed entity has provided detailed reasons along with confirmation whether the transactions were subsequently approved/ratified/rejected by the Audit Committee, in case no prior approval has been obtained.	Yes -	None
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	None
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	None
11.	Actions taken by SEBI or Stock 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 except as provided under separate paragraph herein.	No	refer under paragraph mentioned below
12.	Additional non-compliances, if any: No additional non-compliance observed for any SEBI regulation/circular/guidance note etc.	Yes	none



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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 conditions while appointing/re-appointing an auditor		
	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	NA	No such instance arose during the review period
	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	NA	
	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 statutory auditor		
	i. Reporting of concerns by Auditor with respect to the listed entity/its material subsidiary to the Audit Committee: a. In case of any concern with the management of the listed entity/material subsidiary such as non-availability of 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.	NA	No such concerns raised during the review period
	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.	NA	No such instance arose during the review period
	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.	NA	No such instance arose during the review period
	ii. 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.	NA	No such instance arose during the review period



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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	No such instance arose during the review period
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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:

Sr. No.	Compliance Requirement (Regulations/ circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Payment of listing fees	Regulation 14	Company had not made payment of listing fees for the earlier financial years and the FY year under review.	NIL	NA	The Company had not paid listing fees of NSE for F.Y.2023-24 and interest for delayed payment of Annual Listing fees from F.Y. 2020-21 to F.Y. 2023-24 and Annual Listing fees of BSE is pending from the F.Y. 2020-21.	NIL	The Company continues to be non-compliant towards payment of Annual Listing Fees to National Stock Exchange of India Limited (NSE) & Bombay Stock Exchange (BSE).	The Company has made the Payment towards Annual Listing Fees to NSE upto F.Y. 2023-24. The Company is making efforts to pay the Annual Listing Fees pending with BSE.	



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

Sr. No.	Compliance Requirement (Regulations/circulars/ guidelines including specific clause)	Regulation/ Circular No.	Deviations	Action Taken by	Type of Action	Details of Violation	Fine Amount	Observations/ Remarks of the Practicing Company Secretary	Management Response	Remarks
1	Board of Directors of Top 2000 listed Companies shall have a minimum of 6 Board Members	17 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company did not have the requisite number of Board of Directors until February 22 nd 2023	NSE	Warning Letter	Non-compliance with minimum number of Board of Directors despite being in Top 2000 listed entities on NSE	3,30,000.00	The said non-compliance was complied by appointment of Board Members w.e.f. 22 nd Feb. 2023	The Company was in the process of finding suitable candidate for the position of Directors in the Company. The Company is compliant with the same in the present date.	
2	Filing of Secretarial Compliance Report within a period of Sixty days from the end of the Financial year	24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015	The Company did not file the Secretarial Compliance Report for financial year 2021-22 within the specified due date	NSE	Show Cause Notice for Delisting	Show Cause Notice Ref: NSE/ENF/DELIST/191/01	1,48,000.00	The Said report was filed on 31/03/2023.	The Company was in the process of appointing of Secretarial Auditor and hence it could file the Compliance Report within due time. The Company is compliant with the	



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									same in the present date.	
3	Filing of Financial Results within 45 days of the end of the quarter and within 60 days of the end of the year	33 of SEBI (Listing Obligations and Disclosures Requirements), 2015	The Company had not filed the financials of the company for the year ended March 31, 2022, June 30, 2022, September 2022 and December 2022 within the specified due date.	BSE & NSE	Warning Letters, Suspension of Trading and Show Cause Notice for Delisting	NSE: Suspension in trading of securities Ref No. NSE/SOP/SUS/0555 DATED 19 July 2022 Show Cause Notice Ref: NSE/ENF/DELIST/191/01 BSE: Show Cause Notice Ref: LIST/COMP/AS/13/2023-24	3,70,000.00	The Financial results for year ended March 31, 2022, June 30, 2022, September 2022 and December 2022 was filed on 31/03/2023	The Company could not do so due to non-provision of BENPO S data by Link in Time which was required to conduct and EGM to regularize the appointment of the Statutory Auditor of the Company. The Company is compliant with the same in the present date.	
4	Filing of Compliance Certificate by Registrar and Share Transfer Agent of the Company	74(5) of SEBI (Depositories and Participants) Regulations, 2018	The Company has filed the certificates for the quarters March and June 2022 with a delay.	-	-	-	-	The said Certificate for quarter ended March and June 2022 was filed late	The Company was not able to do the same due to non-receipt of data from the RTA of the Company i.e. Link Intime Private Limited. The Company is compliant with the same in the present	



Dhirendra R. Maurya
M.Com, ACS

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Practicing Company Secretary

								date.	
5	Filing of Reconciliation of Share Capital Audit Report	76 of SEBI (Depositories and Participants) Regulations, 2018	The Company has filed the Audit Reports with a delay for the quarters March and June 2022.	NSE	Suspension of Trading of Securities & Show Cause Notice for Delisting	Suspension in trading of securities Ref No. NSE/SOP/SUS/055 5 DATED 19 July 2022 Show Cause Notice Ref: NSE/ENF/DELIST/191/01		The report for Quarter ended March and June 2022 was filed on 11 th March 2023.	The Company was not able to do the same due to non-receipt of data from the RTA of the Company i.e. Link Intime Private Limited The Company is compliant with the same in the present date.

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.
2. 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.
4. 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.

Regards,

D MAURYA & ASSOCIATES
Practicing Company Secretary



CS Dhirendra R. Maurya
Proprietor
ACS No. 22005; CP No. 9594

Peer Review Cert. No.: 2544/2022
UDIN: A022005F000498569

Date: 30.05.2024
Place: Mumbai