## Symbiox Investment & Trading Co. Ltd.

221, Rabindra Sarani, 3rd Floor Room No. - 1, Kolkata - 700 007

Contact : 98302 74227

CIN: L65993WB1979PLC032012 Website: www.symbioxinvestment.com E-mail: symbioxinvestment100@gmail.com

May 30, 2024

To,
Compliance Department
Metropolitan Stock Exchange of India Limited
Vibgyor Towers, 4th floor, Plot No C 62, G - Block,
Opp. Trident Hotel, Bandra Kurla Complex,
Bandra (E),
Mumbai – 400 098

To,
The Secretary
The Calcutta Stock Exchange Limited
7, Lyons Range,
Kolkata- 700 001

To,
The Listing Compliance Department
The Bombay Stock Exchange Limited,
PJ Towers, Dalal Street
Mumbai- 400 001

Dear Sirs,

Sub: Annual Secretarial Compliance Report under Regulation 24A for the financial year ended 31st March, 2024

Ref: Script Code:- BSE-539278; MSEI- SYMBIOX; CSE- 029461

Pursuant to Regulation 24A of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 please find enclosed Annual Secretarial Compliance Report issued by Mr. Akhil Agarwal, Practicing Company Secretary for the year ended March 31, 2024.

Kindly acknowledge the receipt and take the same on record

Thanking you,

Yours faithfully

For Symbiox Investment & Trading Co Ltd

Khushboo Pitti

K. Q.Hi

Company Secretary and Compliance Officer

Encl: As stated above

Akhil Agarwal, B.Com, ACS 506/1, Grand Trunk Road, 2nd Floor, Howrah (South) - 711 101, INDIA

## SECRETARIAL COMPLIANCE REPORT OF SYMBIOX INVESTMENT & TRADING CO LTD FOR THE FINANCIAL YEAR ENDED 31st MARCH 2024

- I, Akhil Agarwal Practicing Company Secretary have examined:
  - (a) All the documents and records made available to us and explanation provided by SYMBIOX INVESTMENT & TRADING CO LTD ("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 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 there under; and
  - (b) the Securities Contracts (Regulation) Act, 1956 ("SCRA"), rules made there under and the Regulations, circulars, guidelines issued there under by the Securities and Exchange Board of India ("SEBI"):

The specific Regulations, whose provisions and the circulars/ guidelines issued hereunder, 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 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 Debt Securities) Regulations, 2008; Not Applicable to the Company during the Review Periods No.
- (g) Securities and Exchange Board of India (Issue and Exting of Non-Convertible and Redeemable Preference

## Shares) Regulations, 2021; Not Applicable to the Company during the Review Period;

(h) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

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.	<u>Particulars</u>	Compliance Status (Yes/No/NA)	Observations/ Remarks made 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 has been reviewed & timely updated as per the regulations/circulars/guidelines issued by SEBI	Yes	
3.	<ul> <li>Maintenance and disclosures on Website:</li> <li>The Listed entity is maintaining a functional website</li> <li>Timely dissemination of the documents/ information under a separate section on the website</li> <li>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</li> </ul>	Yes	
4.	<u>Disqualification of Director:</u> None of the Director of the Company are disqualified under Section 164 of Companies Act, 2013	Yes	:
5.	To examine details related to Subsidiaries of listed entities:  (a) Identification of material subsidiary companies (b) Requirements with respect to disclosure of material as wellas other subsidiaries	NA	Company do not have any Subsidiary
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	Yes	HAT WE SALL TO SEE

	Archival policy prescribed under SEBI LODR		
	Regulations, 2015.		Į.
7.	Performance Evaluation:	Yes	-
666	The listed entity has conducted performance evaluation of the Board, Independent Directors and the Committees at the start of every financial year as prescribed in SEBI Regulations		
8.	Related Party Transactions:	Yes	
	<ul> <li>(a) The listed entity has obtained prior approval of Audit Committee for all Related party transactions</li> <li>(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</li> </ul>		
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	<del></del>
	The listed entity is in compliance with Regulation 3(5) & 3(6)SEBI (Prohibition of Insider Trading) Regulations, 2015		
11.	Actions taken by SEBI or Stock Exchange(s), if any:	Yes	1. Reg 23(9) for
	Actions 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		second half year ended March 2023 has been submitted late. 2. The CG Report for the half- year ended
			30.09.2023 was submitted timely. The Company has adopted some changes with
	· · · · · · · · · · · · · · · · · · ·		regards to Resignation of Directors in the
	JAR GAR	15. M	Board Meeting held on 5 <sup>th</sup> September,
11.	1 2 Change Co.	(A) (A)	

			2023. The Company hasn't updated Directors Resignation of Mrs. Rajkumari N askar (Independe nt Director) & Mr Mahavir Verma (WTD & CFO) of the Company in CG Report for the half-year ended 30th Septe mber, 2023,
12.	Additional Non-compliances, if any:	No River A National States	

Compliances related to resignation of statutory auditors from listed entities and their material subsidiaries as per SEBI Circular CIR/CFD/CMDI/114/2019 dated 18th October, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/NA)	Observations /Remarks by PCS
1	Compliances with the following of auditor	conditions while appoir	nting/re-appointing an
	i. If the auditor has resigned within	NA	No such events took
	45 days from the end of a quarter		place
	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		į.
	the next quarter; or	8	
	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		
2	Other conditions relating to resig	nation of statutory and	litor
	i. Reporting of concerns by Auditor	NA	No such events took
	with respect to the listed entity/its		place
	material subsidiary to the Audit		place
	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		
.	b. In case the auditor proposes to		••
	resign, all concerns with respect to		
. :	the proposed resignation, along		
	with		
٠.	relevant documents has been		GAF W
· .	brought to the notice of the Audit		7/~~
	Committee. In cases where the	1/8/ten	Legano No. 1 * 1
	proposed resignation is due to		SKATA E
	non-receipt of information /	11.0/	Y7 /\$1/
			- SI/

٠.,			
	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. 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 events took place
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/ICFD/CMD1/114/2019 dated 18th October 2019.	NA	No such events took place

(a) The listed entity has complied with the provisions of the above Regulations and circulars/guidelines issued there under, except in respect of matters specified below:-

orb 5	Sr. No.	Compli ance Require ment (Regula tions/ circular s/guid elines includin g specific clause)	Regul ation/ Circul ar No.	Deviati ons	Actio n Take nby	Type of Action  Advisory /Cla rification/ Fin e/Show Cause Notice/ Warning,	Details of Viola tion	Fine Amoun t	Observati ons/Rem arks of the Practicing Company Secretary	Manag ement Respon se	Remar ks
SAR CONSTRUCTION OF THE PROPERTY OF THE PROPER	* THE SO	Reg	23(9)	Compan y is in the process of complyin	BSE MSE	etc. Fine	March 2023		the process of	, ,	

·		I	·	1	7	T	···	1	1	T	· · · · · · · · · · · · · · · · · · ·
				g the					·		
		- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		same							
	2	Reg	18 & 19	The	BSE	Discrepan	)	***************************************	The	The	
		<u> </u>		Compan	MSE	су			Company	Company	
				y hasn't					has	has	
				updated					necessary	responded	·
				Directors					taken to	for the	
				Resignati					comply with	E .	
				on of					the same.	query.	İ
.											
				Mrs. Rajk	1					1	
				umari Na				. :			
1				skar (Ind							
				ependen						;	
				t .							
				Director)							
				& Mr							
	ļ			Mahavir				ļ. :		1	
'	Ì			Verma						·	
	.			(WTD &	7.						. ]
				CFO) of							
1	1			the							
	İ			Compan							
				y in CG							
	ı	•		Report							
				for the							
			1	half-year							
				ended 30							
				th Septem							
			:								ļ
İ	- 1			ll							1
				ber,							
		• :		ber, 2023.							Manager
		D =		2023.	DOE	NII					
3	3	Reg		2023. The	BSE	NIL	According	· •	The	The	
3	3	Reg		2023. The Compan	BSE	NIL	to Section		Company	Company	
3	3	Reg		The Compan y after	BSE	NIL	to Section 203 of	-	Company has		
3	3	Reg		The Compan y after the	BSE	NIL	to Section 203 of Companie	-	Company has necessary	Company	na de la companya de la companya de la companya de la companya de la companya de la companya de la companya de
3	3	Reg		The Compan y after	BSE	NIL	to Section 203 of	<b>—</b>	Company has necessary taken to	Company has	
3	3	Reg		The Compan y after the	BSE	NIL	to Section 203 of Companie	-	Company has necessary taken to comply with	Company has responded for the	
	3	Reg		The Compan y after the Commu	BSE	NIL	to Section 203 of Companie s Act, 2013,	-	Company has necessary taken to	Company has responded	
3	3	Reg		The Compan y after the Commu	BSE	NIL	to Section 203 of Companie s Act, 2013, Company'	<b>-</b>	Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board	<b>-</b>	Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication Module has	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD	-	Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication Module has appointe	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or	•	Company has necessary taken to comply with	Company has responded for the	
(2)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO.		Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence,		Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are	-	Company has necessary taken to comply with	Company has responded for the	
(2)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested		Company has necessary taken to comply with	Company has responded for the	
3	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify		Company has necessary taken to comply with	Company has responded for the	
	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f.	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the		Company has necessary taken to comply with	Company has responded for the	
(2)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f.	BSE	NIL	to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm		Company has necessary taken to comply with	Company has responded for the	
C)		Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key	-	Company has necessary taken to comply with	Company has responded for the	
	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri		Company has necessary taken to comply with	Company has responded for the	
(3)		Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri al		Company has necessary taken to comply with	Company has responded for the	
(1)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri al personnel		Company has necessary taken to comply with	Company has responded for the	
(1)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also adopted	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri ai personnel viz. MD/		Company has necessary taken to comply with	Company has responded for the	
(2)	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri al personnel		Company has necessary taken to comply with	Company has responded for the query.	*
	3	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also adopted	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri ai personnel viz. MD/		Company has necessary taken to comply with	Company has responded for the query.	*
(1)	A CAMPACA AND A	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also adopted the	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri al personnel viz. MD/ CEO/		Company has necessary taken to comply with	Company has responded for the query.	*
(1)	A CONTRACTOR OF THE PROPERTY O	Reg	17	The Compan y after the Commu nication Module has appointe d Mr. Samit Ray as Managin g Director w.e.f. 08/11/202 3. The Compan y has also adopted the appoint	BSE		to Section 203 of Companie s Act, 2013, Company' s Board must have an MD and/or CEO. Hence, you are requested to clarify on the appointm ent of key manageri al personnel viz. MD/ CEO/ Manager		Company has necessary taken to comply with	Company has responded for the query.  A35073 KOLYATA	

r			· · · · · · · · · · · · · · · · · · ·	· 1		,	·	·			***************************************
.			1	Ray as			203 (1)(i)				
				Managin			of the				
				<u>g</u>			Companie			: :	
				Director			s Act, 2013.				ļ
٠. ا	4	Reg	18	There	BSE	Discrepan	Discrepa	-	The	The	
1				has been		су	ncy:1.	**	Company	Company	
		1		change			Audit		has	has	
				in the			Committ		necessary	responded	
1				Composi			I .		taken to	for the	
			İ	tion of			ee of		comply with	query.	
				Board of			compan		the same		
				Directors			y should				
				for the			have 3				
	٠			half-			directors.				
				year			Symbiox				
				ended			Investme				
				30.09.20			nt &				
				23. The							
			İ	Compan			Trading				
				y has	.		Compan				
1				uploade			y Ltd				
		. :		d the			have				
				Change	4		only 0				
			·.	l in			directors.	ì		- ]	
				Composi							
			ľ	tion to			PO 755 PT TE WWW PO PO				
				BSE						'	
				timely			,	1			
Ì				but has			2.		Africa		
				not		- 1	Nominati				
				updated	. i		on and				
				Resignati			remuner			*:	
				on of		e San San San San San San San San San San	ation				
				Mrs.			committ				
1			: ··.	Rajkuma			ee of		• .		
				ri Naskar	+:	1.11	compan				
1				(Indepen	.		y should				
		:		dent			have 3				
				Director)		1 1 1	directors.			:	
				of the							
	٠			Compan		*	Symbiox				
	: .			y in CG			Investme				
				Report	***************************************		nt &		·, [		
				and the			Trading				
				same		]·	Compan		l	•	
				was			y Ltd has				
l				adopted		:	2				
l				in the		· .	directors.			ļ	
				Board		. [	(1975 x 11 - 1990 x 12 -	.			
				Meeting							
				dated	. ]					779	
				5th	: . I				175	少义创	1
		10.00		Septemb					//\$\\ 	Membershin No. N	2
		•		er, 2023 .					*	W35073	*
-			. [	As per				•	181	KBLKATA	¥ l
				mail		Q <sup>2</sup>				ny Sec	<b>V</b>
				from BSE,			-				
				the							

	the Processi ng fees of Rs.		PARTITION OF THE PARTIT	
	, the Compan y has also applied for Waiver and paid		The state of the s	
	and do the needful in this regard. As per further mail dated			
	you and shall be highly grateful if you take this into consider ation			
All records	revised the CG Report for the half- year ended 30.09.20 23. We hereby assure			

				ee was			chairpers			1. 1.	
				physical	1 1 12			· .	]		
					1 '		on of				
				y unfit to			Stakehol				
	1			attend	1 .		1				
			1	the AGM.			ders			,	
				1	1		Relations			ľ	
				He was			1				
				having			hip				
				high			committe				
							e at the				·
	Ì			fever,	İ						·
				cough &			annual				
				cold.			general				
				1			1 .				
							meeting				
				·			is				
							1.	i .			
				1			submitte			1	
							d as No in				
							1	]		ļ	
						4. D. 7.D.	CG				
		[					Report for	i			
					٠.		1 '		. •		.
			1	[			quarter				-
					1		endedSe		· · · · · · · · · · · · · · · · · · ·		
							ptember				
			1				1.7				: •
			1				2023. You				
•							are				].
							1				
	ļ						requeste				
							d to			· ;	
							1				
							provide				
							clarificati				·
			٠.				on for the				
			٠.								
			· .				on for the same.				
					<b>DO</b> E		same.				
	6	Reg	18(1)(d	Mr.	BSE	Discrepan	same.		Company	The .	
	6	Reg	18(1)(d )	1	BSE	Discrepan cy	same. Accordin				
	6	Reg	18(1)(d )	Варра	BSE	Discrepan cy	same.  Accordin g to Reg		has	Company	
	6	Reg	18(1)(d )	Bappa Mitra,	BSE	Discrepan cy	same. Accordin		has necessary	Company has	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper	BSE	Discrepan cy	same.  Accordin g to Reg 18(1)(d),		has necessary taken to	Company	
	6	Reg	18(1)(d )	Bappa Mitra,	BSE	Discrepan cy	Accordin g to Reg 18(1)(d), Complia		has necessary taken to comply with	Company has responded	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of	BSE	Discrepan cy	same.  Accordin g to Reg 18(1)(d),		has necessary taken to	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit	BSE	Discrepan cy	same.  Accordin g to Reg 18(1)(d), Complia nce		has necessary taken to comply with	Company has responded	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ	BSE	Discrepan cy	Accordin g to Reg 18(1)(d), Complia nce status of		has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit	BSE	Discrepan cy	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence		has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was	BSE	Discrepan cy	Accordin g to Reg 18(1)(d), Complia nce status of		has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall	BSE	Discrepan cy	According to Reg 18(1)(d), Compliance status of Presence of	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to	BSE	Discrepan cy	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend	BSE	Discrepan cy	According to Reg 18(1)(d), Compliance status of Presence of	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend	BSE	Discrepan cy	same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM.	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was	BSE	<b>cy</b>	same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM. He was having	BSE	<b>cy</b>	same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of audit committe	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM. He was having	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM. He was having high	BSE	<b>cy</b>	same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of audit committe	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM. He was having high fever,	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual	• •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM. He was having high fever,	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE	<b>cy</b>	same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE	<b>cy</b>	same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of audit committee at the annual general meeting is	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the	
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the	A
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  According to Reg 18(1)(d), Compliance status of Presence of chairpers on of audit committee at the annual general meeting is	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in CG	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d )	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in CG	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in CG	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.	ARM
	6	Reg	18(1)(d	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in CG	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.  AG  Manufert AG  AG  AG  AG  AG  AG  AG  AG  AG  AG	ARM
	6	Reg	18(1)(d	Bappa Mitra, Chairper son of audit committ ee was physicall y unfit to attend the AGM, He was having high fever, cough &	BSE		same.  Accordin g to Reg 18(1)(d), Complia nce status of Presence of chairpers on of audit committe e at the annual general meeting is submitte d as No in CG	• • • • • • • • • •	has necessary taken to comply with	Company has responded for the query.  AG  Manufert AG  AG  AG  AG  AG  AG  AG  AG  AG  AG	ARM

÷.

						 			_
						· · · · · · · · · · · · · · · · · · ·			Ŀ
				ŧ	er 2023		i	1.1	1
- 1			1		G 2020				1
				i i					1
- 1							· l	í	1
· · ·				l i					Ľ
٠. [								i	L

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

Sr.	Complian	Pogul	<u> </u>	Action		Detail	Fine	Observa	Manag	I
No.	Complian	Regul ation/	Deviati	Taken	Type of	s of	Amount	ti	ement	Re
INO.	Require	Circular	ons	by	Action	Viola	AHIOUHE		Respon	ma
	ment	No.		Dy		tion		m arks	se	rks
1	(Regulati	INO.	114. 0.5			HOH		of the	36	
	ons/				Advisory/Cl			Practicin		
	circulars/				arification/Fi			g		
	guid				ne/Show			Compan		
	elines				Cause			y		
	including				Notice/War		}	Secretar		
	specific			, e .	ning, etc.			у		٠.
	clause)	4						,		
1.	Reg	23(9)	Company	BSE	Fine	March	17,700	Company is	Company	
			is in the	MSE		2023	each	in the	is in the	
			process					process of	process	
			of					complying	of	
			complyin				]	the same	complyin	
			g the					,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	g the	
			same						same	
2.	Reg	18 & 19	The	BSE	Discrepancy	_		The	The	
-		l	Company	MSE				Company	Compan	
1		F .	hasn't				Ì	has	y has	
			updated					necessary	responde	
			Directors				<i>:</i>	taken to	d for the	
			Resignati					comply		
			on of					with the	query.	
			Mrs. Rajk	٠.				same.		
			umari Na							
			skar (Inde							
			pendent							
			Director)					٠.		
										٠.
		and the second second	& Mr							
			Mahavir							
			Verma							
	·		(WTD &							
			CFO) of							
			the							
	·		Company							
			in CG						• .	
			Report							
[]			for the							:,
[ ]			half-year		5.4					
			ended 30 <sup>t</sup>							
[: - ]			<sup>h</sup> Septem					· .	1000	
1 4			ber,	·.					シイスク	
			2023.	.				\tilde{\zeta}	Membalkhie No	(2)
								*	A360X3	[*]
		• : .						1131	KOKAMA	

	3.	Reg	17	The	BSE	NIL	Accord		The	The	1
	٠.	"""		Compan			ng to		Company	Compan	
	:			y after			Section		has	y has	
	÷	·		the		1	203 of		necessary	responde	,
				Commun			Compa		taken to	d for the	
		1. 1. 1. 1.		ication			nies		comply with the	query.	1
				Module			Act,	]	same.		
				has			2013,		Julio.		
				appointe			Compa				
1				d Mr. Samit			ny's		·		
		: .		Rayas			Board must	ľ			
				Managin			have				
	• •			g Director			an MD				
	٠.			w.e.f.			and/or				
				08/11/202			CEO.				
				3. The			Hence,		٠.		
				Compan			you are			, .	
			,	y has		٠	request				
				also			ed to				
				adopted			clarify				
	: .			the			on the				
				appoint ment of			appoint				
				Mr. Samit			ment of key				
	İ			Ray as			manag				
				Managin			erial				
				g Director			person			ļ	
	İ						nel viz.				
							MD/				].
							CEO/				
							Manag				
'							eras		.		
							per the				
	1	*	· ·		**:		Section 203	•			
							(1)(i) of				.
							the				. [
							Compa				
				.			nies				
					* . *		Act,				1.
_						<u> </u>	2013.				
4	•	Reg	18	There has	BSE		Discre	-	The	The	
		-		been		i	pancy	-	Company has	Compan	
				change in the			: 1.		necessary	y has	
				Composit			Audit	ľ	taken to	d for the	
				ion of	l		Com		comply	query.	:
				Board of			mittee	İ	with the	900.7.	
				Directors			of		same		
				for the			comp	.		and the state of t	
ľ	1			half-year			any.			ADJA GA	16
				ended			shoul	·	/ <del>*</del>	Madrie	
:				30.09.202			d		(1×1	43%	151
				3. The			have	-  -	18	KOVKAI	
				Compan		·	3		· W	ot do	6/1
			.	y has uploaded		٠.	direct		ſ		
<u> </u>				apiodueu	<u>l</u>					<u>:-</u>	

b

											:	11.11
					the	<u> </u>		ors.Sy			1	
					Change			mbiox				
					in	1		Invest				
					Composi			ment				
					ion to BSE		·	&				
			.		timely but has			Tradin				
		1		• *	not			g				
					updated			Comp				
					Resignati			any				
					on of Mrs.			Ltd				
					Rajkumai			have				
					i Naskar			only 0				
					(indepen			direct				
					dent			ors				
					Director) of the							
.					Compan				:			
					y in CG							
					Report		-					
					and the			2,				
					same		·	Nomin			٠.	
					was	<u> </u>		ation				
1					adopted			and		50.500 Libraria		
İ					in the			remu				
.					Board Meeting			nerati				
					dated 5th			on				
					Septemb	1	·	com				
-					er, 2023 .			mittee				
					As per			of				
					mail from			comp				
			.   .		BSE, the			any				
					Compan			shoul	. 5			
					y has revised			d				
				· · · · · · · · · · · · · · · · · · ·	the CG			have				
					Report for			3				
					the half-			direct				'
					year			ors.Sy				
					ended			mbiox				
				·	30.09.202		٠	Invest				
					3. We		· .	ment				
					hereby assure			&				
					you and			Tradin				
.					shall be			g				
					highly			Comp				
					grateful if			any				
					you take			Ltd				
			.   .		this into			has 2	. :			
•					consider			direct		MAA	7	
	:		1.		ation and do the			ors.		/EXT	12/2	
۱.					needful in			100000000000000000000000000000000000000		The mentalishing	3 /2	
					this					1/*/ KOLKY	TA Jaj	
					regard.					Company	50°/	.
					As per					Carry		
-												

					٠,						
			**								
				further						-	
				mail							
				dated							
				17.12.2023,							ļ.
	1		·	the			٠.				
	· .			Compan							
				y has also							
				applied							
			ĺ	for							
				Waiver							
				and paid						· .	
				the	٠						
				Processin							
	:			g fees of							
				Rs. 11,800							
				dated							
				20.12.2023							
	5.	5	Reg	20(3)	Mr.	BSE	Discre			The	The
	J .	J	veg	20(3)	Варра	DOL	pancy	Accordi	_	Compan	
					Mitra,						pany
					Chairper			ng to		necessa	has
					son of			Reg		ry taken	resp
					Stakehol			20(3),		to	onde
					ders			Complia		comply with the	d for
					Relation			nce		same	the
					ship	·		status of			quer
					committ			presenc			у.
					ee was physicall	-		e of			
				I	y unfit to			chairper			
					attend			son of			
					the AGM.			Stakehol			
i v					He was			ders			
					having			Relation			
. • •					high			ship			
					fever,			committ		' '	
					cough &			ee at the			
		** .			cold.			annual			
								general			
				٠.				meeting			
								is			
						1		submitt			-
								ed as No			
								in CG			
								Report			
							1	for			.
			. :		· .		4-10-10-10-10-10-10-10-10-10-10-10-10-10-	quarter			
1.	.							endedSe			.
								ptember	15000		
								2023.	( ) JA	7	
								You are	1/2/ Jerst	1 1 ON 01	
								requeste	1/4 / Design	ATA )	
								d to	18/10	]\$#	
								provide	pany	38//	
									NAME AND ADDRESS OF THE PARTY O	200	

								clarificat			
								ion for		'	
								the			
İ								same.			
				]							
	6.	Reg	18(1)(d)	Mr.	BSE	Discrepancy	Accor	-	Company	The	
				Варра			ding to		has	Compan	
			4	Mitra,		:	Reg		necessary	,	
				Chairpers			18(1)(d		taken to	responde	
	٠.			on of			),		comply with the	d for the	
				audit			Compl		same	query.	
				committe e was			iance				
			* * * * * *	physicall			status				
				y unfit to			of				
				attend	: .		Presen				
				the AGM.			ce of				
				He was			chairp				
1				having			erson				
				high	·		of				
				fever,			audit				
				cough &	İ		comm				
				cold.			ittee at				
							the				
							annual				
			·				gener				
	ł						al				
							meetin				
							g is				
							g is submit				
					* * * *		ted as				
							No in				
							CG				
							Report				
							for				
											.
							quarte			* :	ļ
							r ended			. ]	-
	.									j	
			. '				Septe				
							mber			7.5	
L							2023				

For, AKHIL AGARWA

AKHIL AGARWAN Company GE ACS No.: 35073 C P No.: 16313 UDIN No. A035073F000170527

Place: Howrah Date: 30.05.2024