

TULSI EXTRUSIONS LIMITED

Regd. Off. PLOT NO. N-99, M I D C AREA, JALGAON MH 425003

CIN: L29120MH1994PLC081182

Email: tulsipipesindia@gmail.com, Contact No. +91 8530069505

May 30, 2024

**To
BSE Limited
Department of Corporate Services
P. J. Towers, Dalal Street,
Mumbai - 400001
Scrip Code No. 532948**

**To
National Stock Exchange of India Limited
Listing Department
Exchange Plaza, Bandra-Kurla Complex
Bandra [East] Mumbai - 400051
Symbol: TULSI**

**SUB: ANNUAL SECRETARIAL COMPLIANCE REPORT FOR THE FINANCIAL YEAR
ENDED 31ST MARCH, 2024**

Dear Sir/Madam,

Pursuant to Regulation 24A of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 read with the relevant circular(s) issued by SEBI/Stock Exchanges from time to time, please find enclosed the Annual Secretarial Compliance Report issued by M/s. Vinod Kumar & Associates, Practicing Company Secretary, for the financial year ended March 31, 2024.

Thanking you,

Yours faithfully,

For Tuls Extrusions Limited

JALAJ

GURJAR

Jalaj Gurjar

Company secretary & Compliance officer

Digitally signed by
JALAJ GURJAR
Date: 2024.05.30
18:22:10 +05'30'

Encl: As above



**SECRETARIAL COMPLIANCE REPORT OF
TULSI EXTRUSIONS LIMITED (CIN: L29120MH1994PLC081182)
FOR THE YEAR ENDED MARCH 31, 2024**

I have conducted the review of the compliance of the applicable statutory provisions and the adherence to good corporate practices by **TULSI EXTRUSIONS LIMITED (hereinafter referred to as "the Company")** having its registered office at Plot no. N-99, MIDC Area, Jalgaon, Maharashtra, India, 425003.

Secretarial Review was conducted in a manner that provided me a reasonable basis for evaluating the corporate conducts/statutory compliances and expressing our opinion thereon. Based on our verification of the Company's books, papers, minutes books, forms & returns filed and other records maintained by the Company and also the information provided by the Company, its officers, agents & authorized representatives during the conduct of Secretarial Review,

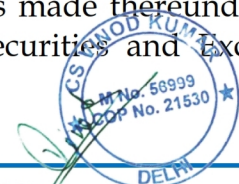
I hereby report that in my opinion, the Company has, during the review period covering the financial year ended on March 31, 2024, complied with the statutory provisions listed hereunder. Further, it is pertinent to note that the Company was acquired from liquidation through e-auction conducted on 20.05.2021 and thereafter the company keep adhering the necessary compliances subject to the availability of data. The Company made rigorous effort and filed several applications before the ROC for getting the status of Active Company and accordingly the company got the active status on 22.01.2024. Thereafter, the company made necessary compliances before the Registrar of Companies as well as SEBI.

I have examined:

- all the documents & records made available to me and explanation provided by the Company,
- the filings/ submissions made by the Company to the stock exchanges,
- website of the Company and
- any other document/filing, as may be relevant which has been relied upon to make this certification

for the year ended March 31, 2024 ("**Review Period**") in respect of compliance with the provisions of:

- the Securities and Exchange Board of India Act, 1992 ("**SEBI Act**") and the Regulations, Circulars, Guidelines issued thereunder and
- the Securities Contracts (Regulation) Act, 1956 ("**SCRA**") & the 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:

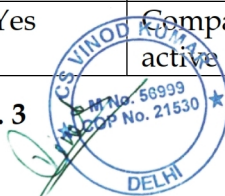
- (a) the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
- (b) the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018; *(Not Applicable during the review period)*
- (c) the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011;
- (d) the SEBI (Buyback of Securities) Regulations, 2018; *(Not Applicable during the review period)*
- (e) the SEBI (Share Based Employee Benefits and Sweat Equity) Regulations, 2021; *(Not Applicable during the review period)*
- (f) the SEBI (Issue and Listing of Non-Convertible Securities) Regulations, 2021; *(Not Applicable during the review period)*
- (g) the SEBI (Prohibition of Insider Trading) Regulations, 2015;
- (h) Other Regulation as applicable and Circulars/ Guidelines issued thereunder;

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

Sr. No.	Particulars	Compliance Status (Yes/No/ N.A.)	Observations/ Remarks by PCS
1	Secretarial Standards: The compliances of the Company are in accordance with the applicable Secretarial Standards (SS) issued by the Institute of Company Secretaries India (ICSI) notified by the Central Government under Section 118(10) of the Companies Act, 2013 and mandatorily applicable.	No	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024
2	Adoption and timely updation of the Policies: <ul style="list-style-type: none"> • All applicable policies under the SEBI Regulations are adopted with the approval of the Board of Directors of the Company and • All the policies are in conformity with the SEBI Regulations and have been reviewed & updated on time, as per the Regulations/ Circulars/ Guidelines issued by the SEBI. 	Yes	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024
3	Maintenance and disclosures on Website: <ul style="list-style-type: none"> • The Company is maintaining a functional website; • Timely dissemination of the documents/ information under a separate section on the website and • Web-links provided in the annual corporate governance reports 	Yes	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024



	under Regulation 27(2) are accurate and specific which re-directs to the relevant document(s)/ section of the website.		
4	Disqualification of Director: None of the Director of the Company are disqualified under Section 164 of the Companies Act, 2013.	Yes	-
5	To examine details related to Subsidiaries of listed entities: a. Identification of material subsidiary companies and b. Requirements with respect to disclosure of material as well as other subsidiaries.	Yes	The Company does not have any material subsidiary and the Company has complied with the requirement with respect to disclosures of other subsidiaries.
6	Preservation of Documents: The Company is preserving and maintaining records as prescribed under the SEBI Regulations and disposal of records as per Policy of Preservation of Documents and Archival policy prescribed under the SEBI LODR Regulations, 2015.	Yes	The company was acquired under liquidation through E-Auction. The company has kept in records as much as document, which is made available by the liquidator.
7	Performance Evaluation: The Company 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 the SEBI Regulations.	No	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024
8	Related Party Transactions: a. The Company has obtained prior approval of the Audit Committee for all Related Party Transactions and; b. The Company 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.	No	As of now, there is no related party transaction done during the year. Since the company got active on 22.01.2024
9	Disclosure of events or information: The Company has provided all the required disclosure(s) under Regulation 30 along with Schedule III of the SEBI LODR Regulations, 2015 within the time limits prescribed thereunder.	No	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024
10	Prohibition of Insider Trading: The Company is in compliance with	Yes	Company got the active status on



	Regulation 3(5) & 3(6) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.		22.01.2024 from ROC and in operation from 01.04.2024
11	Actions taken by the SEBI or Stock Exchange(s), if any: No action(s) has been taken against the Company/ its Promoters/ Directors/ Subsidiaries either by the SEBI or by Stock Exchanges (including under the Standard Operating Procedures issued by the SEBI through various circulars) under the SEBI Regulations and Circulars/ Guidelines issued thereunder.	Yes	-Please refer note as mentioned below
12	Additional Non-compliances, if any: No any additional non-compliance observed for all the SEBI Regulations/ Circulars/ Guidance Notes etc.	N.A	During the period under review there were no instances of non-compliance observed for applicable the SEBI Regulations/Circulars/ Guidance Notes etc.

Compliances related to resignation of the Statutory Auditors from listed entities and their material subsidiaries as per the SEBI Circular CIR/CFD/CMD1/114/2019 dated October 18, 2019:

Sr. No.	Particulars	Compliance Status (Yes/No/N.A.)	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	N.A.	Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024
	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	N.A.	During the period under review, there were no incidence of resignation by the Statutory Auditors of the Company.
	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	N.A.	

	quarter of such financial year as well as the audit report for such financial year.		
2	Other conditions relating to resignation of the Statutory Auditors		
	<p>i. Reporting of concerns by the Auditor with respect to the Company/its material subsidiary to the Audit Committee:</p> <p>a. In case of any concern with the management of the Company/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 Company and the Audit Committee shall receive such concern directly and immediately without specifically waiting for the quarterly Audit Committee meetings.</p> <p>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.</p> <p>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.</p>	<p>N.A.</p> <p>N.A.</p> <p>N.A.</p>	<p>Company got the active status on 22.01.2024 from ROC and in operation from 01.04.2024</p> <p>During the period under review there were no incidence of resignation by the Statutory Auditors of the Company.</p>



	<p>ii. Disclaimer in case of non-receipt of information:</p> <p>The Auditor has provided an appropriate disclaimer in its audit report, which is in accordance with the Standards of Auditing as specified by the ICAI/ NFRA, in case where the Company/ its material subsidiary has not provided information as required by the Auditor.</p>		
3	The Company / 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 18 th October, 2019.	N.A.	During the period under review there were no incidences of resignation by the Statutory Auditors of the Company.

The Company has complied with the points 6(A) & 6(B) as mentioned in the SEBI Circular No. CIR/CFD/CMD1/114/2019 dated October 18, 2019 and it has incorporated all the terms & conditions in the respective appointment letter/ supplemental letter issued to the Statutory Auditors.

(a) The Company 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 Actions	Details of Violation	Fine Amount	Observations/Remarks of PCS	Management Response	Remarks
Not Applicable										

(b) The Company 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 Actions	Details of Violation	Fine Amount	Observations/Remarks of PCS	Management Response	Remarks
Not Applicable										

Note: It is apposite to note that the Company had filed requisite application before the Hon'ble NCLT for seeking exemption from certain provision of SEBI regulations for listing of new shares and extinguishment of existing shares. However, the Hon'ble NCLT directed us to make BSE, NSE and



SEBI party to the matter. Therefore, company withdrew such application and now, the company is under process to file fresh application, wherein the company shall make party to BSE, NSE and SEBI. Further, we had also filed in the same application for seeking waiver of fees/interest of CIRP/Liquidation period i.e. on or before 31.12.2021 from CDSL, NSDL and RTA. Due to which, the said authorities i.e. RTA and Depositories are not providing the data for filing the required Disclosures/Report to make necessary compliances. Therefore, it is hereby submitted that the company is in complete willing to comply the necessary compliances subject to the availability of data/information and submitting as much as documents/information could provide to the exchanges to maintain transparency and integrity withing stakeholders.

**For Vinod Kumar & Associates
Company Secretaries,
Peer Review Certificate No. 3221/2023**

**Date: 30.05.2024
Place: Delhi**

**VINOD
KUMAR** Digitally signed
by VINOD
KUMAR
Date: 2024.05.30
11:11:57 +05'30'


CS VINOD KUMAR
Proprietor
ACS: 56999 CP: 21530
UDIN: A056999F000493314